

PRETREATMENT PROGRAM

# ANNUAL REPORT

JANUARY 1, 2025 - DECEMBER 31, 2025



ATTACHMENT VOLUME I

NBC AND PRETREATMENT PROGRAM  
SPECIFIC INFORMATION

***ATTACHMENT VOLUME I***

***NARRAGANSETT BAY COMMISSION***

***AND***

***PRETREATMENT PROGRAM***

***SPECIFIC INFORMATION***

**LISTING OF ATTACHMENT SECTIONS  
ATTACHMENT VOLUME I**

**NBC AND PRETREATMENT PROGRAM  
SPECIFIC INFORMATION**

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

***ATTACHMENT VOLUME I***

***SECTION 1***

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

***INFORMATIONAL LETTERS TO  
USERS***



February 10, 2025

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

Dear «Title» «Last\_Name»:

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

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

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

<https://www.narrabay.com/2025/01/28/apply-for-a-nbc-2024-environmental-merit-award-today/>

Please download the application and return it by March 8, 2025 to:

John Motta, Engineering Technical Specialist  
The Narragansett Bay Commission  
Seven Service Road  
Providence, RI 02905  
Email: [jmotta@narrabay.com](mailto:jmotta@narrabay.com)

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

Sincerely,

Kerry M. Britt  
Pretreatment Manager

cc: John Motta



March 10, 2025

## 2025 OPEN HOUSE LETTER

Dear «Title» «Last\_Name»:

In celebration of Rhode Island Clean Water Week, the Narragansett Bay Commission (NBC) will offer free public tours of its award-winning Field's Point Wastewater Treatment Facility in Providence on Saturday, April 12, 2025, from 10:00 AM to 1:00 PM.

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

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

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

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

Members of the public can book a tour on the half hours between 10:00 AM and 1:00 PM by emailing [nbcpr@narrabay.com](mailto:nbcpr@narrabay.com). Spaces are limited. The tour will take approximately 90 minutes.

The NBC joins seven other clean water agencies in Rhode Island offering free public tours during Rhode Island Clean Water Week. Information on other tours is available at [ricwa.org](http://ricwa.org)

Sincerely,

Kerry M. Britt  
Pretreatment Manager



March 12, 2025

**PERFECT COMPLIANCE  
MASS MAILING  
ALL SIUs – Both Districts  
List Attached**

Dear «Title» «Last\_Name»:

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

Armbrust International, Ltd.	Hindley Manufacturing Company
HP Services, Inc.	Manchester Street, LLC
John H. Collins & Sons Company	Materion Technical Materials, Inc.
Metallurgical Solutions, Inc.	Narragansett Jewelry Co., Inc. dba C & J Jewelry Co.
Providence Metallizing Company, Inc.	Rhode Island Heat Treating & Black Oxide Company, LLC
Rhode Island Resource Recovery Corporation	Stackbin Corporation
Tanury Industries PVD, Inc.	Technodic, Inc.
Tedor Pharma, Inc.	The Okonite Company
Truex, Inc.	Univar Solutions USA, Inc.

An advertisement recognizing the achievements of these companies was published in the Providence Journal on February 28, 2025. Aligned herewith is a copy of the advertisement for your reference.

Sincerely,

Kerry M. Britt  
Pretreatment Manager

KMB:sm



March 20, 2025



**MASS MAILING ALL SIU's  
Fields Point and Bucklin Point  
List Attached**

Dear «Title» «Last\_Name»:

The R. I. DEM requires the Narragansett Bay Commission (NBC), to notify all significant industrial users annually if their firm was classified as a Significant Industrial User (SIU) during that report year. Therefore, this letter is to notify you that your firm was classified as a SIU during 2024, since one or more of the following criteria applied to your firm:

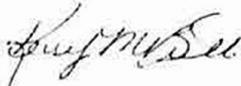
1. Firm is subject to Federal EPA categorical standards;
2. Firm discharges an average process waste stream of 5,000 gallons per day (0.005 MGD) or more;
3. Firm contributes a process waste stream which is 5% or more of the average dry weather hydraulic or organic capacity of the NBC treatment facility to which the firm discharges;
4. Firm has reasonable potential to adversely affect the POTW's operation, or has the potential for violating any pretreatment standard or requirement.

In accordance with EPA and NBC regulations and the terms of NBC Wastewater Discharge Permits, SIUs must comply with various site specific requirements and must also comply with the EPA reporting requirements outlined in 40§CFR403.12. These requirements may include (1) development, implementation, and maintenance of Toxic Organic Solvent Management and Spill & Slug Prevention Control Plans, (2) monitoring of process effluent, and (3) maintenance of logbooks, manifests, and associated paperwork. Reporting requirements may include (1) immediate notification of any spill or slug discharge, (2) twenty-four hour notification of any effluent violation, (3) submission of properly completed and signed Self-Monitoring Compliance Reports with each wastewater analysis, (4) notification of any changes in operation, and (5) submission of any other document by specified dates.

Please refer to your permit to ensure that you are in full compliance with the requirements that apply to your facility. I recommend that you have regular meetings with all levels of employees to discuss the environmental regulations and your permit requirements. Avoiding non-compliance is a hard job requiring the participation of every employee at your facility.

If you have any questions regarding this letter or the NBC Pretreatment Program, please contact the engineer or technician responsible for regulating your firm at 461-8848, ext. 490.

Sincerely,



Kerry M. Britt  
Pretreatment Manager

KMB:sm

March 20, 2025



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

Dear «Title» «Last\_Name»:

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

**SIGNIFICANT NON-COMPLIANCE CRITERIA**

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

The EPA requires that the NBC review each industrial user file every three (3) months for SNC criteria A and B, referenced above, evaluating the user's previous six (6) month compliance status. **If an industrial user exceeds the compliance percentages specified in the SNC criteria A or B, even for just one quarterly evaluation period, the user is in SNC and must be listed in the newspaper.** The NBC still reviews each user file annually to determine the user's compliance status with EPA criteria C through H. This EPA data evaluation method clearly shows how important it is for an industrial user to sample early and often during each quarterly data review period, especially for any parameters which your firm may periodically experience excursions above the discharge limits.

Submit all reports by the due date specified by the NBC. The name of your firm will automatically be published in the newspaper as being in SNC for criteria F if any NBC requirement is not satisfied within thirty (30) days of the due date. Notify the NBC within twenty-four (24) hours of becoming aware of any sampling violation and immediately begin to resample for any parameters in violation. This is required by your discharge permit and is clearly stated on the Self-Monitoring Compliance Report form that must accompany each analyses. Please do not hesitate to contact NBC Pollution Prevention staff if your firm is experiencing compliance issues and would like assistance with pollution prevention measures.

Please note that the NBC does not want to publish the name of any firm, but we may have no choice. On February 28, 2025, the names of eighteen firms from both districts were published in an advertisement in the Providence Journal due to their SNC status. These firms were billed by the NBC for the cost for this public notice. A copy of the public notice is enclosed for your information. Only you can ensure that the name of your firm is not published for being in SNC with NBC and EPA regulations. Good luck maintaining full compliance during 2025.

If you should have questions regarding this letter or your permit requirements, please contact the Pretreatment office at 461-8848, ext. 490.

Sincerely,



Kerry M. Britt  
Pretreatment Manager

KMB:sm

Enclosure

April 8, 2025



**ELECTRONIC PERMIT APPLICATION LETTER  
ALL USERS  
LIST ATTACHED**

User Id#: PT-«User\_Id»

Dear «Title» «Last\_Name»:

I am happy to announce that you can now complete and submit Wastewater Discharge Permit applications electronically as well as pay application fees online. When you are required to reapply for a new/revised permit, you can access the applications at the following link:

<https://www.narrabay.com/programs-and-initiatives/pretreatment/pretreatment-applications/>

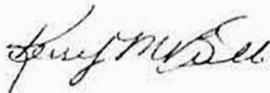
If you are required to submit supporting documentation, you will be able to upload the documents to the application. When the application is completed, and it is ready to be submitted you will be directed to pay the associated application fee. If you elect to pay the fee online, you will use your User ID # referenced above as the invoice number. The link to pay the application fee online is:

<https://ipn4.paymentus.com/rotp/nbcc>

Submitting the Wastewater Discharge Permit Application and associated fee online will satisfy the requirements to submit this information and you will not be required to submit a hard copy with a "wet signature".

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

Sincerely,



Kerry M. Britt  
Pretreatment Manager

April 30, 2025

**2025 SNC PUBLIC NOTICE  
LIST ATTACHED**



User Id#: PT-«User\_Id»

Dear «Title» «Last\_Name»:

The Narragansett Bay Commission (NBC) is required by the EPA to publish annually the names of all firms in Significant Non-Compliance (SNC). As you may know, the name of your firm was published in the Providence Journal on February 28, 2025, as being in SNC with NBC or EPA regulations for the reporting period of October 1, 2023 through December 31, 2024. A copy of the Public Notice is enclosed for your information. The publication of your company name should have come as no surprise to you since a form letter dated March 20, 2025, was sent to all users explaining the NBC regulations, the SNC review criteria, and the consequences for non-compliance. In addition, your firm was notified by Notice of Violation citing each non-compliance event at the time the violation occurred, notifying you of the fact the name of your firm may be published for being in SNC.

Enclosed please find an invoice in the amount of \$75.00 for your share of the cost of the public notice which must be paid by May 30, 2025. This may be paid online at the link below using your User ID#.

<https://ipn4.paymentus.com/rotp/nbcc>

You may also pay by remitting a check. If you chose to pay by check, it must be made payable to the **Narragansett Bay Commission and mailed to the Pretreatment Section, 2 Ernest Street, Providence, RI 02905. (Please do not send the check to customer service with your pretreatment fee or consumption payment as this will result in billing errors.)**

Thank you for your anticipated prompt payment, and I urge you to comply with all your permit requirements and NBC/EPA regulations so that the NBC will not have to publish the name of your firm in the future. The NBC Pollution Prevention Staff is available to provide free technical assistance to your firm. To take advantage of the free NBC Pollution Prevention program, contact John Motta at 461-8848 ext. 471.

Sincerely,

Kerry M. Britt  
Pretreatment Manager

KMB:sm

Enclosures

cc: Leah Foster  
Holly lalongo, Esq.



# INVOICE

**Customer:**

CUSTOMER NAME:  
CUSTOMER ADDRESS:

**User ID Number:** PT-**Invoice Date:****Terms:** NET 30**Due Date:****Customer Number:****Remit Payment To:**

NARRAGANSETT BAY COMMISSION  
PRETREATMENT OFFICE  
2 ERNEST STREET  
PROVIDENCE, RI 02905

**Pay Online at:**

<https://ipn4.paymentus.com/rotp/nbcc>

Description	Amount
SNC PUBLIC NOTICE	\$00.00
<b>Total Amount Due to NBC: \$00.00</b>	

(NBC Office Use Only)	Amount
Reviewed By:	

If you have any questions regarding this invoice, contact the Pretreatment office at 401-461-8848, ext. 490



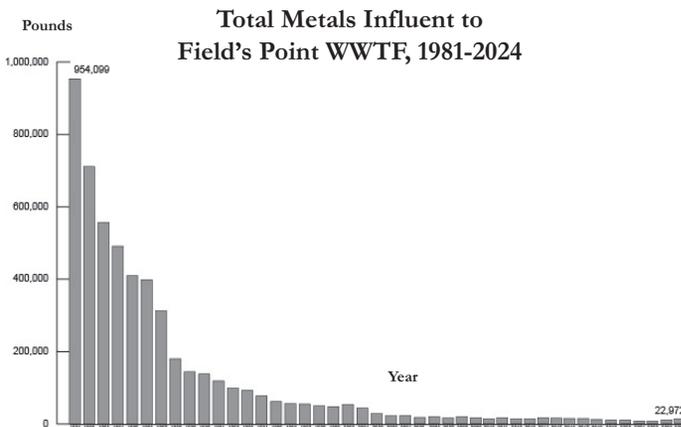
# PUBLIC NOTICE

## Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Section 1.10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2023 through December 31, 2024. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

### Significant Non-Compliance Criteria:

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



THE NARRAGANSETT BAY COMMISSION IS COMMITTED TO PROTECTING THE STATE'S TWO LARGEST WASTEWATER TREATMENT FACILITIES AND NARRAGANSETT BAY FROM TOXIC DISCHARGES. This is accomplished by the issuance of discharge permits to commercial and industrial sewer users. These discharge permits specify the level of pollutants that can be discharged in a facility's wastestream and may require a firm to conduct wastewater monitoring to verify compliance with discharge limits, to implement a Spill Control Plan and/or Toxic Organic/Solvent Management Plan, and to install pretreatment equipment. Various reporting and record keeping requirements may also be written into discharge permits. The firms listed in this public notice violated one or more of the significant non-compliance criteria specified above. The Commission is required by the RI DEM and the US EPA to annually publish the names of all firms violating any of these criteria. Therefore, firms must be sure to comply with all the terms specified in their discharge permit to ensure that the name of their firm is not listed in this annual public notice. The NBC offers FREE technical assistance to firms located in the NBC service area through its non-regulatory Pollution Prevention assistance program. For information on how the NBC can help your firm achieve and maintain compliance, contact the NBC Technical Analysis and Compliance Section at 461-8848/TDD 461-6549 to schedule a free Pollution Prevention audit.

Most businesses located in the NBC district are to be commended for the fine job they have done treating their process discharges to remove toxic pollutants. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel and zinc and 80,440 pounds of cyanide to the Field's Point Wastewater Treatment Facility. Since 1981, the total metals and cyanide loadings to the Field's Point facility have been reduced by 97.6% and 98.4% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility.

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

### Bucklin Point Service Area

Pawtucket		
Company Name	Violations Cited	Present Status
Kitchen & Countertop Center of New England	Failure to submit report on time (6)	Report has not been received
New England Paper Tube Co.	Failure to submit report on time (6)	Report has been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received
Lincoln		
Bento Nouveau	Failure to submit report on time (6)	Report has been received
Chemart Company	Failure to submit report on time (6)	Report has been received
Denison Pharmaceuticals, LLC	BOD (1,2) TTO (1,2)	Firm is still experiencing compliance issues
Palate Pack	Failure to submit report on time (6) Failure to submit report on time (6)	Report has been received Report has been received
Cumberland		
Cintas Corporation	TTO (1,2)	Firm is still experiencing compliance issues
East Providence		
Aspen Aerogels Rhode Island, LLC	TSS (1,2) Failure to submit report on time (6)	Firm is now in compliance Report has been received

### Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
AS220 (Print Shop)	Failure to submit reports on time (6)	Reports have been received
Ira Green, Inc.	EPA - CN (2)	Firm is now in compliance
Luluna Health, LLC	Failure to submit reports on time (6)	Reports have not been received
Mahr, Inc.	Cr (2)	Firm is now in compliance
Providence Brewing Company, LLC	BOD (1,2)	Firm is now in compliance
Providence Specialty Products, LLC	Failure to submit reports on time (6) BOD (1, 2)	Reports have been received Firm is still experiencing compliance issues
Quality Spraying Technologies	Failure to submit report on time (6) Failure to submit report on time (6)	Report has been received Report has been received
Johnston		
Granitec Marble and Granite LLC	Failure to submit report on time (6)	Report has been received
R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received

June 9, 2025



**2025 SUMMER SHUTDOWN LETTER  
LIST ATTACHED**

Dear «Title» «Last\_Name»:

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

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

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

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

Sincerely

Kerry M. Britt  
Pretreatment Manager

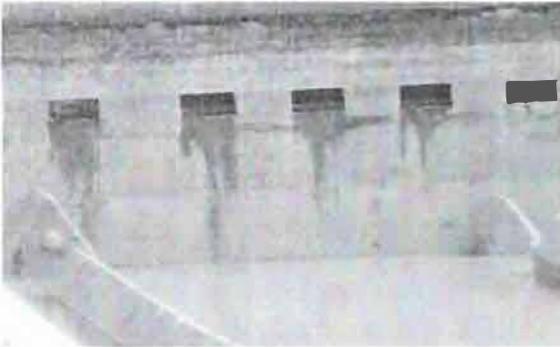
October 15, 2025



**2025 MASS MAILING  
FUEL OILS USERS  
LIST ATTACHED**

Dear «Title» «LastName»:

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



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

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

Sincerely,

Kerry M. Britt  
Pretreatment Manager

cc: Pretreatment Staff

November 26, 2025



**MASS MAILING  
HOLIDAY SHUTDOWN LETTER  
ALL IU AND SIU  
CATEGORIES 11 THRU 59  
LIST ATTACHED**

Dear «Title» «Last\_Name»:

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

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

Sincerely,

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

Kerry M. Britt  
Pretreatment Manager

KMB:sm

Enclosure

December 30, 2025

**2026 FEE PAID LETTER STICKER  
WITH DATA BASE  
SEPTAGE HAULER**

Permit Number: «PERMIT\_NUMBER»

Dear «TITLE» «LASTNAME»:

Enclosed please find «NUMBER» 2026 Narragansett Bay Commission (NBC) permitted Septage Hauler Identification Sticker(s). Effective January 1, 2026, a sticker must be affixed to the inside windshield of each NBC permitted truck for identification purposes. Vehicles without a sticker will not be permitted to dump at the NBC Septage Receiving Facility.

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

Sincerely,



Sulema Martinez  
Pretreatment Clerk

Enclosure(s)

***NEWSPAPER AND MAGAZINE  
ARTICLES***

PROVIDENCE PORT DAY IS SATURDAY, MAY 17 – REGISTER HERE AND NOW!



ENVIRONMENT

# Much Adoo About Sludge: Why Providence Residents Should Care About Sewage Management

MARCH 19, 2025  
BY EMILY SMITH

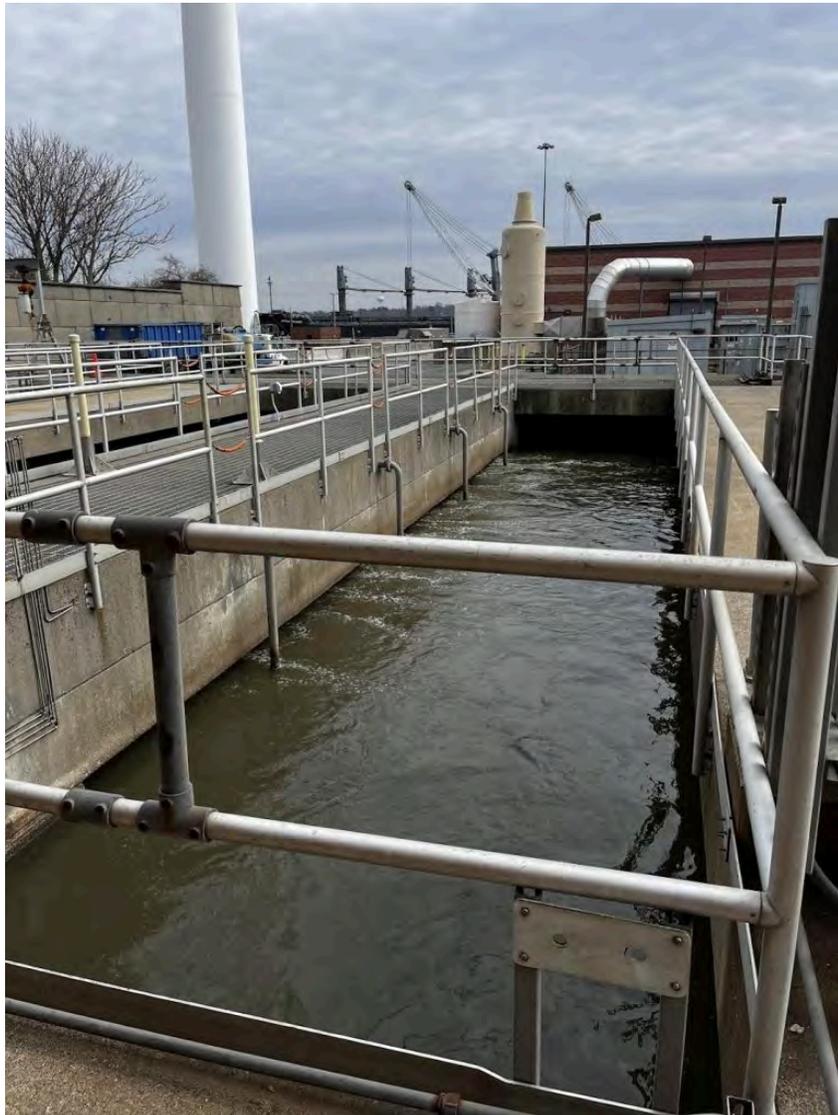


Photo: Unsplash/Giorgio Travato

### What is sewage sludge and how do we dispose of it?

Sewage sludge is a disgusting but essential part of the Narragansett Bay Commission's (NBC) work to manage wastewater and keep Narragansett Bay and Providence clean. After wastewater is cleaned at NBC's Fields Point Facility in Providence, sewage sludge is left, and it's getting increasingly tough to figure out what to do with it.

Wastewater, which includes human waste, food residue, environmental waste, rainwater, and even garbage, is first filtered through screens at the NBC, which block large items like sticks and bottles from moving through the water treatment process. Those larger items are removed and landfilled. In the next phase of treatment, dense matter (like human waste), sinks to the bottom of a tank at the treatment facility, while lighter waste and fats float to the top. The water, now separated from most of the solid, dense, waste, moves on for further treatment and is eventually sent back, clean, into Narragansett Bay. The waste that sank to the bottom is thickened using a chemical polymer, and the resulting sewage sludge must be dewatered and discarded.



*Wastewater enters the Narragansett Bay Commission's treatment facility at Fields Point. Large debris is filtered through screens, with the remaining wastewater moving on for further treatment. Photo:Emily Smith.*



*Dense solids are separated from wastewater during the treatment process at Fields Point. Photo: Emily Smith.*

Sewage sludge could be **dumped** into the ocean but the Ocean Dumping Ban Act of 1988 prohibited that. Today, there are three primary outlets for the disposal of sewage sludge: landfilling, incineration, and land application. Landfilling, uncommon in this region, is not a sustainable option because of the greenhouse gases released once the sewage sludge enters the landfill. Plus, there simply isn't enough room at Rhode Island's only landfill. Land application is a more sustainable way to recycle sewage sludge and benefit the soil, at the same time, but it's not commonly used here, simply because there is not enough land to apply significant quantities of sludge, (referred to more delicately, after treatment, as 'biosolids'). The land application of biosolids has come under recent scrutiny for the potential human health impacts—but more on that later. The other primary outlet, on which the NBC relies, is incineration.

### **Managing Providence's sewage**

The NBC is unique in New England as it's one of only a few wastewater treatment facilities that manages its own dewatering, creating sludge that can be transported to the incineration facility and burned. Other wastewater treatment facilities create liquid sludge, and rely on outside vendors to dewater the sludge so that it can be incinerated. Rhode Island has two incinerators—one in Woonsocket operated by **Synagro**, and another in Cranston, operated by **Veolia**. 25-30 municipalities in the region send their solid and liquid sludge to Woonsocket.





*The Woonsocket Incinerator, operated by Synagro. Photo courtesy of synagro.com.*

The Wastewater Treatment Facility in Woonsocket is owned by the City, and maintained by **Jacobs**, a Texas-based consulting and engineering firm, with incineration managed by **Synagro**, a biosolid recycler based in Baltimore (**RI DEM**). The incinerator can accept about 105 tons of dewatered sludge per day, based on their current air permit, and collects about 22 dry tons of biosolids from the NBC alone. Working with Synagro since 2006, the NBC pays the company about \$5.8 million annually to transport and incinerate its sewage sludge.

While incineration is relatively cost-effective, according to Janine Burke-Wells, the Executive Director at the North East Biosolids & Residuals Association (**NEBRA**), it's an option with serious problems. Outages are common due to the age of many incinerators, and vendors must keep up with changing environmental regulations. According to a recent Massachusetts Department of Environmental Protection **Study** conducted by consulting firm Tighe & Bond that analyzed sewage sludge management solutions, the Woonsocket incinerator needs about 2 weeks of downtime annually for maintenance. An outage or delay in the incineration process can have compounding effects on wastewater treatment facilities throughout the region that have to treat and move sludge out of their facilities on a daily basis.

While generally, sewage sludge management strategies must diversify, there is one immediate threat to incineration in Rhode Island. Synagro faces a class action lawsuit filed by Woonsocket residents due to the odors emitted from the facility. This comes after the treatment facility was **sued** in 2023 for releasing partially untreated sewage into the Blackstone River. Amidst these challenges, Woonsocket's City Council decided in May of last year that Synagro must phase out its acceptance of liquid sludge. There has been no timeline communicated for this phase-out, but once they do, there will be a huge impact on wastewater treatment facilities throughout the state and region that rely on Synagro to manage their liquid sludge. The study by Tighe & Bond revealed, through a market risk analysis, that Rhode Island's incineration is at high risk of disruption in the next five years. We have increasing quantities of sludge, but do not have enough management capacity for it.

As the largest wastewater treatment facility in Rhode Island and one of the largest in New England, the Narragansett Bay Commission will need to step up as a leader in exploring alternative sludge management solutions. Jim McCaughey, Deputy Director of the NBC, says that the exploration of alternative solutions is an ongoing exercise. The NBC's contract with Synagro ends in May 2026, and although the looming shift to stop liquid sludge acceptance won't have direct implications for the NBC, because they de-water their own, they're worried about how the shutdown may impact treatment facilities throughout the region. One potential solution McCaughey noted was the development of a centralized dewatering facility at Fields Point. This would allow the NBC to accept liquid sludge from other facilities, dewater it, and send it along to an incinerator.

Beyond incineration, the NBC is considering another long-term disposal solution: pyrolysis. This involves a high-heat process, devoid of oxygen, that would turn sludge into biochar, a carbon-rich solid, which could eventually be used as a soil amendment. While this technology has been used on a small scale for decades, wastewater treatment facilities are still years away from adopting this as a widespread solution for sludge management. Janine Burke-Wells from NEBRA thinks we need to turn our attention back to land application as a primary outlet.

### **The struggles with land application**

The Environmental Protection Agency (EPA) released a **risk assessment** in January, acknowledging what many experts already knew—sewage sludge contains at least two types of per- and poly-fluoroalkyl substances (PFAs), known as 'forever chemicals' that pose risks to human health. Maine, recognizing the potential health risks of applying sewage sludge to land, **banned** the practice in 2022. Connecticut has followed suit, with **other states considering similar bans on the land application of biosolids**. The EPA has not implemented any significant measures to stop the land application of sewage sludge in the United States.

PFAs are indeed a concerning component of sludge, among many other harmful materials, as anything that's flushed down the toilet can end up in our sewage sludge. The key action needed to reduce the concentration of PFAs in sewage sludge is source reduction, limiting the forever chemicals in products we use on a day-to-day basis. "The frustrating thing with PFAs is that we're finding them in our sludge in the parts per billion, but if you go to McDonald's and buy a sandwich, the packaging has it in the parts per million (1000x more). That's a lot," said Jim McCaughey.

Janine Burke-Wells clarified that the known human health implications of PFAs are limited to farm families, not the general public. She argues that the benefits of land application should outweigh the drawbacks if sludge is being tested and monitored regularly to gauge the level of harmful chemicals. "The land application end use for biosolids is not always the cheapest or the easiest but it is the most sustainable. The benefits are many and include enhancing soil health, recycling nutrients, reducing fertilizer/pesticide use, strengthening farm economies, and providing micronutrients like zinc, iron, manganese, and copper that healthy soils need and that you will not find in other products, and it has been shown to increase soil carbon content." On the flip side, "the concerns about recycling [biosolids] are also real and include odors, over-applying of nutrients, and trace contaminants like PFAS, pharmaceuticals, etc." So, while the existence of forever chemicals in PFAs is concerning, it's nothing new, and they're not going anywhere until the sources of the PFAs are more strictly regulated.

Until recently, there was some hope that steps would be taken to address PFAs in wastewater. The EPA proposed enacting surface water quality standards under the Clean Water Act, but this proposal was **withdrawn** following President Trump's **Executive Order** for a Regulatory Freeze Pending Review.





*Courtesy of momsleanairforce.com*

### A murky path forward

Wastewater treatment facilities around the region and organizations like NEBRA are working together to brainstorm solutions. One effort has been led by NEIWPC (formerly called the New England Interstate Water Pollution Control Commission), which created a BioHub to match wastewater treatment facilities with vendors working to find innovative sludge management solutions. Burke-

Wells refers to the hub as a 'dating app', allowing service vendors and representatives from treatment facilities to collaborate and share solutions on an ongoing basis.

The source reduction of PFAs is key, but in the meantime, finding alternatives to incineration, landfilling, and land application is critical. For Providence residents who would rather not think about their sewage once it leaves their toilet, think again. Limited solutions to sewage sludge management will eventually lead to a higher demand for management services and a higher price tag. Those higher prices will be passed along to the NBC's ratepayers.

Janine Burke-Wells has one clear call to action: "Pooping and flushing is something we all *do*. We all play a part in the 'quality' of the wastewater and resulting sludges. If people knew the benefits of recycling these valuable organic materials, maybe they would be a little more careful with what they flush. Only the three Ps (pee, poop, (toilet) paper, please!)" The next time you flush, think about the journey those *solids* take to arrive at the Wastewater Treatment Facility, and what would happen if we had nowhere to put that sludge.

#### **TAKE ACTION:**

If you're interested in learning more, join the Providence Eye at its upcoming Port Day on Saturday, May 17. One of the tours that day will feature a tour of the Fields Point wastewater treatment facility. There will be workshop sessions on all different aspects of the Port of Providence, as well. Mark your calendar: registration begins in April.

Also, the RI Clean Water Association will have free tours of waste water treatment plants as part of this year's Clean Water Week. There will be a free tour of the Narragansett Bay Commission's water treatment facility coming up. The tour takes about 45 minutes and tour participants need to wear closed, toed shoes:

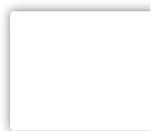
#### **April 12**

#### **Free Tour of Water Treatment Facility as part of Clean Water Week**

2 Ernest Street

Providence/Narragansett Bay Commission

10 AM – 2 PM



# Cleaning Up Narragansett Bay

*Rhode Island commission's CSO abatement program delivers impressive water-quality improvements in Narragansett Bay*

JANUARY 27, 2025 | BY KEN WYSOCKY | TAGS (4)

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Crew members Edwardo Sonsa and Mario Almonte jet grouting for new clarifiers using a C&D drill rig. Photography by Jeff Turner



After 23 years of painstaking work, the third and final phase of an expansive, approximately \$1.5 billion sewer infrastructure project in Rhode Island — the largest public works endeavor in state history — is about halfway to the finish line.

The project, managed by the Providence-based Narragansett Bay Commission, a quasi-public and nonprofit utility agency, is expected to be completed in February 2028. The first two phases have already significantly reduced the number of combined sewer overflows into Narragansett Bay. The bay is a roughly 150-square-mile estuary off the state's coast that's a vital but vulnerable economic and recreational asset that harbors thousands of species of plants, fish and other wildlife.

“It's the biggest construction project in Rhode Island that nobody ever sees,” says Vincent Mesolella, the commission's chairman. “And it's already working very, very well.”

The main feature of the project's third phase is a 2.2-mile-long, 30-foot-diameter tunnel lined with 2.3-foot-thick concrete rings. It can store about 160 million gallons of wastewater from 22 CSOs until there's enough capacity to treat it at the commission's Bucklin Point Wastewater Treatment Facility, one of two owned by the NBC, says Kathryn Kelly, the commission's CSO program manager.

Most of the tunnel passes under Pawtucket, a city directly north of Providence. The tunnel generally follows the east bank of the Seekonk River, one of several local waterways that empty into Narragansett Bay, and its depth ranges from 120 to 150 feet underground.

Started in late 2022, the tunnel boring was completed in February 2024. That was a significant milestone in the project's third phase, which is divided into four smaller phases, Kelly says.

The remaining primary components awaiting completion include four dropshafts that will channel sewer overflows into the tunnel, plus the construction of a pump station that will move those overflows to the Bucklin Point plant, located in East Providence. The facility provides advanced secondary treatment for wastewater flow up to 46 million gallons per day and primary treatment and disinfection for an additional 70 mgd during wet-weather events, with an average flow of about 23 mgd.

When completed, the project is expected to reduce CSOs by 93%, Kelly says. It also will ensure that the water quality in Narragansett Bay complies with mandates outlined in a consent decree filed in 2014 by the Rhode Island Department of Environmental Management in conjunction with the U.S. Environmental Protection Agency.

## Underground Solution

The main component of the first phase of the project, which started in June 2001 and went online in 2008, is a 3.1-mile-long, 26-foot-diameter tunnel lined with 2-foot-thick concrete rings. Its depth ranges from 260 to 280 feet deep and it can hold about 65 million gallons of CSOs.

“It already has captured 16 billion gallons of combined sewer overflows,” Kelly notes.

The first phase also included building seven drop shafts that channel wastewater from 12 CSOs to the tunnel, where they’re stored until there’s enough capacity for treatment at the NBC’s other wastewater plant, the Field’s Point Wastewater Treatment Facility.

The Field’s Point facility is located on the south side of Providence, adjacent to the Providence River. Built in 1901 and upgraded in the 1980s, it’s the largest such facility in the state as well as the oldest; it provides enhanced secondary treatment of 77 million mgd and primary treatment and disinfection for an additional 123 mgd during wet-weather events. The average flow treated is about 50 mgd, she says.

The project’s second phase, completed in 2015, centered on installing two long CSO interceptor sewer lines that connect to the tunnel. One interceptor follows the Woonasquatucket River and consists of around 2.4 miles of 40- to 66-inch-diameter reinforced concrete pipes; the second one is about 1.4 miles long and travels along the Seekonk River, with reinforced concrete pipes ranging from 48 to 60 inches in diameter.

## CSO Ripple Effects

Like so many large and older cities in the United States, Providence’s system of combined sewers — which include some of the oldest sewer lines in the country —

weren't built to handle modern-day wastewater demands, Kelly explains.

"When built, they were designed to keep water from backing up into city streets from manholes and storm drains," she says. "They built overflow points that emptied into the Providence, Seekonk, Moshassuck and Woonasquatucket rivers, which all flow into the bay.

"It was pretty awesome technology in the 1800s, but now it's illegal under the federal Clean Water Act."

At the peak of the problem, about 2 billion gallons of untreated sewage overflows, combined with rainfall runoff, were discharged into the bay annually. As a result, beach closings were common and shellfish harvesting was "conditionally" restricted after heavy rains because of the bacteria carried into the bay.

The latter is particularly important because the shellfish-harvesting industry — think scallops, quahogs (hard-shell crabs), soft-shell crabs, mussels and the like — injects about \$12 million into the local economy and employs thousands of people. Recreational shellfish harvesting also is an extremely popular tourist activity.

When plans for fixing the CSO problems began percolating in the 1990s, 17 different options eventually were developed. The deep tunnels made the most sense because separating the combined sewers would require ripping up miles and miles of city streets and be extremely disruptive as well as inordinately expensive, she notes.

## Good Return on Investment

The project has proved to be a worthwhile investment. The new infrastructure installed in the first two phases — which is designed to catch about 60% of the stormwater that flows through the city's sewer system — is delivering results, Mesolella says.

"We do know that water-quality improvements so far have been pretty impressive," he reports. "In 2017, almost 4,000 acres of shell-fishing area that once was open only conditionally (if water-quality standards were met) has been reclassified as approved, meaning there no longer are conditional limits after rainfalls.

“So the shellfish industry gained about 40 days of work a year.”

Furthermore, beach closings are down by 80% and in 2020, RIDEM opened up the upper part of Narragansett Bay to shell fishing grounds that had been closed for more than 70 years.

Moreover, news reports say that bacteria levels in the bay have been reduced by half. And research performed at the University of Rhode Island revealed that levels of unhealthy nutrients had decreased to half of what they were in the 1990s.

“NBC’s CSO control facilities are designed to reduce the frequency of CSOs to four or less during a typical year of precipitation,” Kelly says.

In addition, before the first tunnel was bored, excess wet-weather flow greater than 77 mgd and up to 123 mgd at the Field’s Point plant was directed to its wet-weather facility. There the wastewater would receive wet-weather treatment, which consisted of some solids settling and full disinfection before being discharged into the Providence River, according to an online NBC report from 2012.

But during the first three years after the tunnel went online in 2008, wet-weather discharges into the river dropped to an average of seven per year, down from an average of 38 per year – an average decrease of 81%. And the average wet-weather flow into the Field’s Point facility dropped 71%, which prevented billions of gallons of contaminated stormwater from entering local rivers and the bay, the report noted.

## Building a Sterling Legacy

The deep-tunnel projects represent a crowning achievement for the NBC, which was created by the state’s general assembly in 1980 to reduce pollution in Narragansett Bay. The agency subsequently took over operation of the Field’s Point plant in 1982; at the time, the facility was one of the largest municipal polluters in the United States.

“Many generations of Rhode Islanders only knew Narragansett Bay as a polluted and shameful place,” Mesolella says. “The Field’s Point facility was the second-worst municipal polluter in New England, with 60 million gallons of sewage discharged into the Providence River every day.”

But by 1995, Field's Point was named the best large wastewater-treatment plant in the nation — a remarkable turnaround, he says.

“We now can hang our hat on the fact that Narragansett Bay is a clean and vibrant place to have fun, go fishing and make a living,” Mesolella says. “With this project, we’re giving Rhode Islanders back their rivers and their bay — things they haven’t been able to use for decades.”



# EPA Meets with Water Systems During Water Week

April 11, 2025

## Contact Information

EPA Press Office

**WASHINGTON** – Earlier this week, as part of annual Water Week, when water professionals gather to discuss priority issues impacting the industry, U.S. Environmental Protection Agency (EPA) Senior Advisor for Water Jessica Kramer joined a roundtable to discuss the Water Infrastructure Financing and Innovation Act (WIFIA). The WIFIA program provides borrowers with flexible, affordable financing options to support water updates in communities. It funds planning, design, and construction of water infrastructure projects and can finance a combination of projects in a single loan.



Roundtable participants discuss WIFIA funding for critical water infrastructure in communities. From left to right: Tony Parrott, Louisville & Jefferson County Metropolitan Sewer District; Karen Jassoy, Padre Dam Municipal Water Department; Andrew Sawyers, EPA; Jessica Kramer, EPA; Todd Swingle, Toho Water Authority; Laurie Horridge, Narragansett Bay Commission; Joshua Schimmel, Springfield Water and Sewer Commission; Susan Pekarek, Johnson County Wastewater; and Paul Matthews, Tualatin Valley Water District.

“Water is essential to Powering the Great American Comeback. Through this low-cost loan program, EPA is accelerating investments in water infrastructure that support healthy Americans while creating jobs and reducing the cost of living,” **said Kramer**. “It is inspiring to hear from practitioners around the country about the incredible work they are doing to benefit the American public. I want to congratulate each of these water executives for delivering multiple benefits to their communities, and I look forward to more progress in the coming years.”

By streamlining the funding process, water systems can accelerate infrastructure projects to benefit communities. The WIFIA program offers interest rate resets, sculpted repayments, and fast disbursements, benefits not traditionally offered with other financing sources. For example, borrowers may defer repayment for up to five years after construction is complete and then customize their repayment schedule through the 35-year loan term. This flexibility provides borrowers with immediate funding to implement projects, while helping to keep rates more affordable.

At this week’s roundtable, EPA included seven existing WIFIA borrowers.

The Narragansett Bay Commission [☑](#) in Narragansett, Rhode Island, and the Toho Water Authority [☑](#) in Kissimmee, Florida, have used multiple WIFIA loans for relatively large-scale projects in their communities. With WIFIA loans, the Narragansett Bay Commission is upgrading its wastewater infrastructure to address combined sewer overflows, protect water quality, and increase system reliability. The Toho Water Authority received WIFIA loans to rehabilitate and replace sewer mains and manholes, as well as incorporate new potable and non-potable water supply sources to offset groundwater demand.

Other roundtable participants included East County Advanced Water Purification Joint Powers Authority [☑](#) in California, which is using a WIFIA loan to help fund a water reuse project that will meet up to 30% of East San Diego County’s drinking water demand.

The Tualatin Valley Water District and the City of Hillsboro [↗](#) in Oregon are working together to increase drinking water capacity and enhance water system reliability in case of an earthquake. The Metropolitan Sewer District [↗](#) in Jefferson County, Kentucky, is upgrading its water quality treatment center to process wastewater and generate Class A biosolids for productive reuse. In Johnson County [↗](#), Kansas, they are using a WIFIA loan to rebuild aging infrastructure to meet future water quality requirements. And in Springfield [↗](#), Massachusetts, a WIFIA loan is helping to accelerate dozens of water infrastructure projects and ensure reliable drinking water and wastewater to customers.

## Background

Established by the Water Infrastructure Finance and Innovation Act of 2014, the WIFIA program [↗](#) is a federal loan program administered by EPA. The WIFIA program aims to accelerate investment in the nation's water infrastructure by providing long-term, low-cost supplemental credit assistance for regionally and nationally significant projects. The WIFIA program has an active pipeline of pending applications for projects that will result in billions of dollars in water infrastructure investment and thousands of jobs. EPA accepts requests for WIFIA financing on an ongoing basis. Learn more about submitting a letter of interest for a WIFIA loan [↗](#).

Last updated on April 11, 2025

# Report: Newport Beach Takes Top Spot for Bacteria Contamination in 2024

By Rob Smith / ecoRI News staff

July 21, 2025

*Polluted beaches are a nationwide problem. (istock)*

WARWICK, R.I. — It's been more than 50 summers since the United States passed the Clean Water Act into law and many of Rhode Island's coastal waters still struggle to meet the "fishable, swimmable" standard for beach season.

[New data \(https://environmentamerica.org/center/resources/safe-for-swimming/\)](https://environmentamerica.org/center/resources/safe-for-swimming/) from Environment America shows that dozens of beaches in Rhode Island tested positive for enterococci bacteria, an indicator of fecal contamination, making them unsafe for both beachgoers and wildlife.

Of the 66 beaches tracked by Environment America in 2024, 39 in the Ocean State, or 59%, tested positive at least one day for indicator bacteria in the water. Another 25 beaches tested positive for potentially unsafe levels of fecal coliform on 25% of all testing days.

In a state where the beaches are considered a public treasure and a draw for tourism, it's a big problem with little awareness. Rex Wilmouth, director of Environment Rhode Island, the local chapter of Environment America, said the report aimed to show how much pollution was in the state's prized coastal waterways.



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

“Our whole philosophy as residents is to go to the beach,” Wilmouth said. “If you have a rash, or an ear infection, diarrhea, or vomiting after going to the beach, you were probably swimming in contaminated water. We encourage people to visit the state Department of Health [website \(https://health.ri.gov/data/beach-closure-data\)](https://health.ri.gov/data/beach-closure-data) before you head to the beach and see if there’s a bacteria or closure recommendation for that beach.”

Nationally, the Environmental Protection Agency [estimates \(https://www.epa.gov/sites/default/files/2014-07/documents/beach-guidance-final-2014.pdf\)](https://www.epa.gov/sites/default/files/2014-07/documents/beach-guidance-final-2014.pdf) an illness rate from contaminated beach water of around 32 out of every 1,000 swimmers.

What beaches were most at risk last year? Easton’s Beach in Newport took the top spot, testing for unsafe levels of enterococci bacteria 10 out of 24 testing days. Scarborough State Beach in Narragansett took second, testing for unsafe levels of bacteria nine out of 24 total testing days in 2024.

Tied for third: Mackerel Cove in Jamestown, Spouting Rock Beach in Newport, and Goddard Memorial State Park in Warwick all tested positive for unsafe levels eight days last year, although Mackerel Cove and Spouting Rock Beach were tested only on 13 days.

Wilmouth noted contaminated water at beaches is one of the few universal environmental issues facing all residents. Narragansett Town Beach by the private Dunes Club, said Wilmouth, tested positive for bacteria contamination exceeding thresholds at least half of the days the water was tested.

“Pollution in the water goes everywhere,” he said. “It doesn’t matter if it’s in a low-income area, or a high-income area, this is happening all over the state.”

Rhode Island isn’t the only coastal state at risk. Environment America’s report detailed the contamination rate of 3,187 beaches nationwide. Rhode Island sits just below the national average: the report found 61% of all beaches tested nationwide were positive at least one day for fecal contamination indicators, and 453 beaches tested positive for unsafe fecal contamination levels on 25% or more of all testing days.

So what’s the source of the contamination? The primary culprit for elevated levels of enterococci for the last 20 Rhode Island summers has been annual summer showers. Stormwater runoff and control is the name of the game.

When rain falls on impervious surfaces — basically any surface that stops rainwater from being absorbed into the ground — it has to go somewhere. When the state builds roads, parking lots, highways, and sidewalks, it also must install storm drains, catch basins and any and all other infrastructure that will safely, and hopefully cleanly, carry that stormwater into Narragansett Bay.

But as stormwater travels from rooftop to parking lot to catch basin, it carries with it whatever chemicals and debris happen to be on the surface it’s traveling on. Lawn fertilizers and animal waste in particular can be big sources of runoff contamination.

Rhode Island’s existing stormwater infrastructure, according to Wilmouth, was built decades prior and is hardly up to the job of cleaning the kinds of runoff the state sees today.



*Beachgoers enjoy a sunny day at Second Beach in Middletown. (Joanna Detz/ecoRI News)*

“We haven’t put that money back into fixing our water systems,” Wilmouth said. “Now is the time to start. We need to continue repairing and upgrading our storm infrastructure for the next 100 years.”

Despite the dire picture painted by Environment America’s report, Rhode Island has made big strides in curbing contaminated water. The Department of Health, which tracks [enterococcal bacteria in beach water \(https://health.ri.gov/data/beach-closure-data\)](https://health.ri.gov/data/beach-closure-data) samples in conjunction with the Department of Environmental Management, keeps a running tally of beaches with “no water contact” advisories imposed, commonly known as beach closures, and an accompanying trendline of rainfall data.

[Last year \(https://ecori.org/beach-closures-declined-sharply/\)](https://ecori.org/beach-closures-declined-sharply/) beaches around the state were closed for a combined 71 days, a sharp decrease compared to 2023, when beaches were closed for 246 days, the largest number of closures since 2006.

The state's beaches appear on track to be closed a similar number of days again this year. By July 18, about halfway through the summer beach season, nine different beaches in Rhode Island had been closed for a combined 54 days.

A big factor in cleaner water quality has been the completion of the Narragansett Bay Commission's three-part combined sewer overflow abatement program (<https://www.narrabay.com/programs-and-initiatives/combined-sewer-overflow-cso/>), so an increase in rainfall one year no longer means an increase in the number of beach closures. The state began cracking down on wastewater treatment plants (<https://ecori.org/expensive-upgrades-pay-off-when-it-comes-to-narragansett-bay/>) discharging effluent into the Narragansett Bay watershed, making sure they were reducing nitrogen and other nutrient loads after the 2003 fishkill in Greenwich Bay killed a million menhaden.

An increase in sewer projects in coastal neighborhoods in Warwick, Newport, and other municipalities, as well as DEM programs to remove cesspools and sump pump discharges, has also contributed to cleaner waters overall for Narragansett Bay and its watershed.

"I love the lakes, I love the ocean, we're not trying to scare people from going to the beach," Wilmouth said. "Be smart, especially after a big rainstorm; we want to make sure that people check and see if the beach they want to go to this weekend is safe for swimming."

Elsewhere in southern New England, Massachusetts had 47 beaches (8% of 563) exceed the EPA's safety threshold on at least a quarter of the days tested. Beaches with potentially unsafe levels of fecal indicator bacteria on at least one testing day in 2024 was 326 (58%).

In Connecticut, 17 beaches (24% of 72) exceeded the safety threshold on at least a quarter of the days tested. Beaches with potentially unsafe levels of fecal indicator bacteria on at least one testing day in 2024 was 64 (89%).

[https://www.valleybreeze.com/news/new-litter-trap-installed-near-sycamore-landing/article\\_4e4f8a7b-b226-409c-b368-a5bd34ae893c.html](https://www.valleybreeze.com/news/new-litter-trap-installed-near-sycamore-landing/article_4e4f8a7b-b226-409c-b368-a5bd34ae893c.html)

FEATURED

## New litter trap installed near Sycamore Landing

By SOFIA BARR Valley Breeze Staff Writer [sofia@valleybreeze.com](mailto:sofia@valleybreeze.com)  
Sep 11, 2025



**John Marsland** of Blackstone Valley Watershed Council and **Stephanie Santos** of the Lincoln Conservation Commission stand in front of Sycamore Landing’s new WaterGoat Litter Boom system.

Breeze photo by SOFIA BARR

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LINCOLN – Local conservationists say they’re hopeful that a new litter boom system will significantly reduce the amount of trash flowing into Pratt Dam.

Over the years, Stephanie Santos, chairperson of the Lincoln Conservation Commission, has done many clean-ups, and has collected hundreds of bags of litter.

She said there are a handful of clean-ups that stick out in her mind as being the worst of the worst, but for her, the 2023 Pratt Dam one takes the cake.

“It was one of the most challenging and eye-opening litter clean-ups ... the trash flowing downstream was relentless, and most importantly, much of it was not originating from Lincoln or Cumberland,” said Santos. “That experience made it clear that we needed a more sustainable, long-term solution.”

Because Pratt Dam is on the Lincoln/Cumberland line, Santos brought the concern to the attention of Lincoln Town Administrator Phil Gould and Cumberland Mayor Jeffrey Mutter. She said she gained the support of both town leaders, and from there, she and the commission began researching ways to cut down on the tremendous amount of litter to better maintain the area.

The commission identified the WaterGoat Litter Boom as the best fit for this stretch of river. This device uses floating buoys or flotation structures with suspended curtains to catch buoyant materials, such as plastic bottles, Styrofoam, and other debris, before it can enter larger waterways, or in this case, travel down to Pratt Dam, and eventually, the ocean.

The WaterGoat website states that since 2006, more than 191 Watergoats have been deployed in public and private waterways. Based on data collected by the company, “the mighty Watergoat fleet has prevented well over 322 tons of debris from ever getting close to the ocean.”

It seemed like the perfect solution, said Santos, and the only issue was the price tag.

“Then, fate somehow worked its magic, and Julia Kaplin, director of Keep Blackstone Valley Beautiful, approached me with an offer of financial support through a donation her organization had received. It was perfect timing, and aligned perfectly with the project’s cost needs,” she told *The Breeze*.

The commission and Keep Blackstone Valley Beautiful looped in The Blackstone River Watershed Council/Friends of the Blackstone and Save the Bay, and everything began to fall into place.

Last September, a representative from WaterGoat conducted a site visit to ensure the system would work for the Pratt Dam location. Once it was given the OK, Kate McPherson of Save the Bay helped file a permit for Rhode Island Department of Environmental Management approval.

Last month, the RIDEM officially approved the permit, and by the end of the month, the WaterGoat was installed near Sycamore Landing. Sycamore Landing is a more manageable landscape that will allow for easy cleaning, trapping trash before it can reach Pratt Dam.

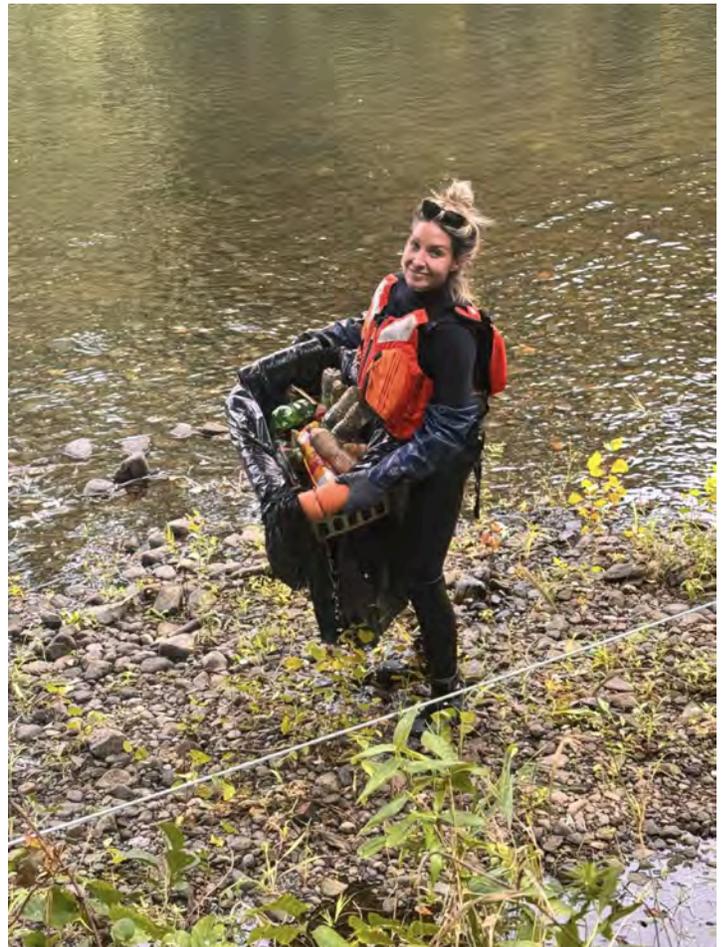
“It was really exciting to see everything come together and to see this become a reality,” said Kaplin. “It’s collecting trash on our behalf 24/7... it really makes a difference, because the way to keep our oceans clean is to collect the litter before it ever gets there.”

Santos noted that the system will be maintained and cleaned out by the commission, as well as Friends of the Blackstone, adding that grant funding from the Narragansett Bay Commission covered the supplies necessary for maintenance.

Due to safety concerns, the boom will be temporarily removed in December, as volunteers must be on the water in a canoe to clean out the mechanism, and winter means choppy waters on the Blackstone.

Aside from making for a cleaner and safer Pratt Dam, Santos said she hopes the WaterGoat makes life easier for John Marsland and Keith Hainley of Friends of the Blackstone.

“They have spent countless hours removing unimaginable amounts of litter from this area, waste one would never expect to accumulate in a town like Lincoln,” she stated. “They were the reason I pursued a boom. I couldn’t stand to see how much effort they put into this, knowing it would soon re-accumulate.”



**Stephanie Santos** cleans Sycamore Landing’s WaterGoat Litter Boom for the first time.

Santos and Marsland agreed that they are eager to begin monitoring the results and maintaining detailed records of collected waste by weight. They said their hope is that this project serves as a model for future installations across other bodies of water or areas in Rhode Island.

“The work is far from over, but this is certainly a step in the right direction... it’s only been up for a few weeks, and we’re already seeing this thing do its job, which is a great sign,” said Marsland.

Santos reiterated that acquiring and getting approvals for the WaterGoat was “a true collaborative process,” and that none of this would have been possible without the efforts from The Blackstone River Watershed Council/Friends of the Blackstone, Keep Blackstone Valley Beautiful, Save the Bay, the Narragansett Bay Commission, and the Lincoln Conservation Commission.

# McDonald Joins NBC as CFO



By **PBN Connect** - 10/01/2025

Kevin McDonald has joined the Narragansett Bay Commission as Chief Financial Officer, where he will oversee the agency's \$302 M annual budget, which includes significant infrastructure investments such as the final phase of the agency's Combined Sewer Overflow project. McDonald previously served as Director of Loan Operations for the US Army Corps of Engineers Water Infrastructure Financing Program and as a Senior Underwriter for the USEPA's Water Infrastructure Finance and Innovation Act Program. He has a undergraduate degree from Brown University and a graduate degree from Harvard University.

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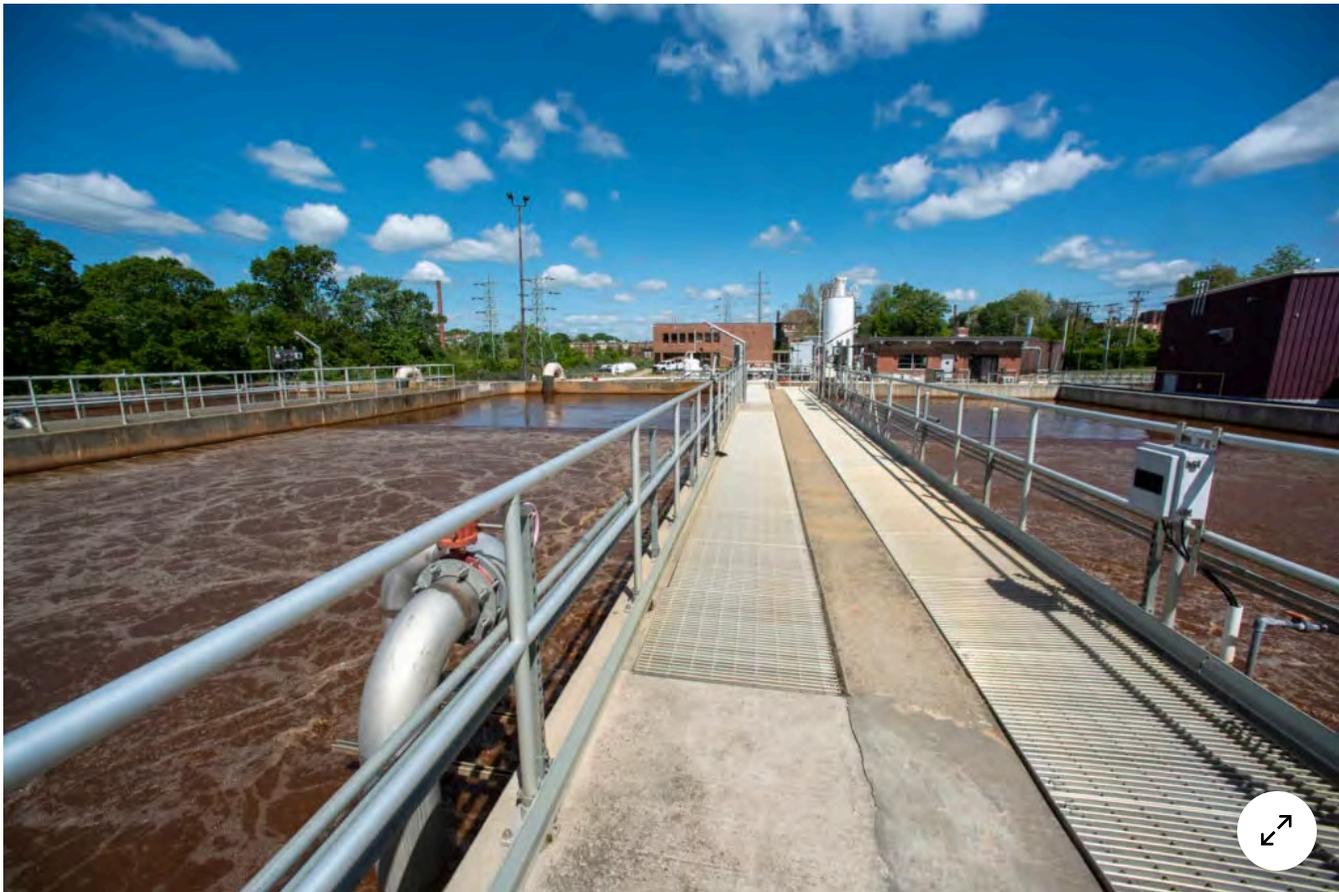
Rhode Island **Current** 

# Woonsocket officials look to burn contracts and sell off regional wastewater treatment plant

Nancy Lavin

Mon, September 8, 2025 at 5:55 AM EDT · 10 min read

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## Key takeaways

- The Woonsocket City Council has approved a resolution to negotiate with the Narragansett Bay Commission to acquire the city-owned Woonsocket Wastewater Treatr [See more](#)

The Woonsocket City Council recently approved a resolution authorizing the city to negotiate with the Narragansett Bay Commission to acquire the city-owned Woonsocket Wastewater Treatment Facility. (Photo by Michael Salerno/Rhode Island Current)

Woonsocket has had enough.

Enough of the stink that stretches for miles and lingers for days. Enough of the sewage-laden trucks rumbling down local roads. Enough of the environmental fines, the lawsuits, the contract disputes and costly equipment repairs.

“The quality of life in this city has suffered long enough,” Woonsocket Mayor Christopher Beauchamp said in a recent interview. “We don’t want to be the disposal of everyone else’s waste.”

After more than a century under city ownership, Beauchamp and the Woonsocket City Council are looking to wash their hands of the Woonsocket Wastewater Treatment Facility: They want to shut down the incineration arm that burns dried waste, and sell off the sewage treatment segment. [An Aug. 25 resolution](#) unanimously approved by the City Council authorizes negotiations to transfer the plant title and permits to the Narragansett Bay Commission, a quasi-public agency that already runs the largest wastewater operations in the state.

The resolution is preliminary and nonbinding, dependent on the agreement of the Narragansett Bay Commission and of the two private companies under contract to manage Woonsocket’s wastewater treatment plan into the next decade. Also a key consideration: the financial implications for a cash-strapped city that brings in money from treating waste throughout the region, while getting free access for its own sewage.

“It’s like playing 20 games of chess at the same time,” City Solicitor Michael Lepizzera said. “It’s going to take a long time. There are a lot of parts and people involved.”

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But Lepizzera thinks the payoff could be worth the challenge.

"This could be a generational change," Lepizzera said.



Woonsocket City Hall on Main Street. (Photo by Nancy Lavin/Rhode Island Current)

### A 'generational change'

Once heralded as a pinnacle of engineering ingenuity and government self-sufficiency, the sprawling, riverfront sewage plant has soured [with time](#). Aging equipment demands costly fixes, or even costlier environmental and legal fees when malfunctions lead to water and air pollution.

Look no further than the series of complaints about untreated sewage pouring into the Blackstone River beginning in 2021, culminating in a [March 2023 lawsuit](#) by the Rhode Island Department of Environmental Management and the Rhode Island Attorney General's Office against the city and the companies contracted

to run the plant. Four months later, a second lawsuit: this time, a [federal class-action case](#) from local residents alleging the smells emanating from the plant have hurt their property values and quality of life. Both cases remain pending, according to court records.

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The City Council's resolution, sponsored by Council President Dan Gendron, points to the drain on financial and legal resources from the protracted legal battles.

The quality of life in this city has suffered long enough. We don't want to be the disposal of everyone else's waste.

#### **- Woonsocket Mayor Christopher Beauchamp**

And while the immediate pollution concerns appear resolved thanks to emergency equipment purchases — for which the city is still repaying the debt — the bill keeps growing.

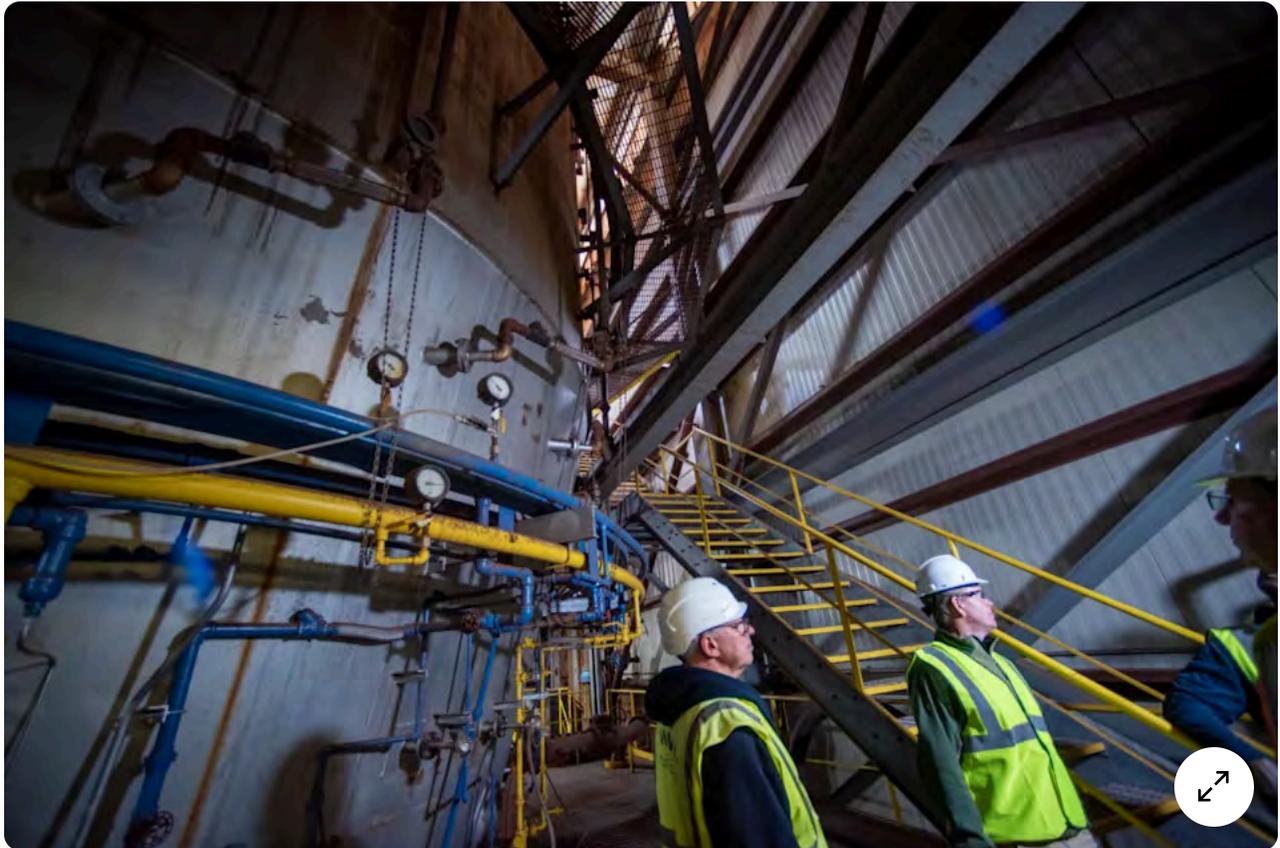
The incineration arm still requires "substantial upgrades and infrastructure improvements," to the tune of \$40 to \$50 million, the City Council resolution states. Neighbors are still filing complaints over the smell.

However, wriggling out of the contracts with the companies hired to run the operations might not be costly or hard. Synagro Woonsocket LLC, the company hired to oversee the incinerator, has indicated it would be open to cutting the 20-year contract off, according to multiple city officials.

"They're spending a lot of money on legal fees," Lepizzera said of the two private contractors. "Eliminating these contracts might be beneficial to them."

Jennifer Cervenka, an attorney for Synagro, did not return multiple inquiries for comment. Jacobs Engineering Group, which oversees the wastewater treatment side of the plant, also did not respond to requests for comment.

Both vendors signed 20-year contracts with the city in 2012, guaranteeing their work and income from services provided through 2032, according to [contracts](#) previously obtained by Rhode Island Current through a public records request.



The incinerator within the Woonsocket Wastewater Treatment Facility burns solidified sludge to produce an ash that is taken to the state Central Landfill. Pictured from left, Karl von Lindenberg [...More](#)

### Looking for an exit

However, the agreements also offer all parties legal exit routes, including for potential negligence — something Beauchamp sees as a firm rationale given the sewage spills that led to the state lawsuit.

“Synagro has not kept up their end of the bargain in fixing that plant,” Beauchamp said.

Lepizzera was reluctant to “disregard” the legally binding agreements with Synagro and Jacobs. He looks to find a mutually beneficial resolution that would

allow the city to shut down the incinerator and sell the treatment plant for the right price.

Much hinges on the terms of a potential sale to the Narragansett Bay Commission, or another owner. Lepizzera declined to name a dollar figure, but wanted a price that covers the city's \$29 million debt on the money it borrowed to pay for plant upgrades last year, and to offset the lost revenue it gets from treating sewage for more than dozen other cities, companies and wastewater plants across the region.

The city brings in \$3 million in annual host fees from the two contractors plus a share of [royalties from incineration](#) up to \$600,000 a year under its contracts with Synagro and Jacobs. And, Woonsocket has its waste treated for free.

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"All of that is going to be part of the equation," Lepizzera said. "If NBC doesn't give us the best deal and bang for our buck, and protect our community, we could go in another direction."

Jamie Samons, a Narragansett Bay Commission spokesperson, declined to comment on specific terms of an agreement, noting that negotiations are just beginning.

"Should NBC and Woonsocket reach a mutually beneficial agreement, these communities — and all who enjoy the Blackstone River — will benefit from NBC's nationally recognized excellence in clean water operations, financial stewardship and community engagement," Samons said in an emailed response. "In the coming months, NBC staff and Board of Commissioners will work closely with key stakeholders to conduct thorough due diligence. If a transfer is approved, NBC is committed to making the transition as seamless and transparent as possible."



The Narragansett Bay Commission's Bucklin Point Wastewater Treatment Facility in East Providence. (Photo by Nancy Lavin/Rhode Island Current)

## A proven track record

Narragansett Bay Commission has proven its skill in transforming struggling municipal wastewater treatment facilities into nationally acclaimed success stories, first with the Field's Point Wastewater Treatment Facility in Providence in 1982, and a decade later, East Providence's Bucklin Point Wastewater Treatment Facility. The [award-winning](#) clean water agency now provides wastewater treatment services to more than 400,000 state residents, while investing in [large-scale capital projects](#) to protect Narragansett Bay from sewage during heavy rainfalls.

"They're one of the best, if not the best, operated wastewater treatment facilities in the state," said Joseph Habarek, administrator of surface water

protection for the Rhode Island Department of Environmental Management. "Overall, they have an excellent compliance record."

They're one of the best, if not the best, operated wastewater treatment facilities in the state.

### **– Joseph Haberek of the Rhode Island Department of Environmental Management regarding Narragansett Bay Commission**

At the time Synagro took over the Woonsocket incinerator in 1988, [it too received](#) acclaim from the U.S. Environmental Protection Agency for transforming a hearth furnace combustion system into one that uses electricity and a wet flushing system to treat solid waste. Subsequent upgrades turned the local incineration facility into a regional powerhouse, able to burn up to 105 tons of dried waste a day, 90% of which comes from government and commercial customers across Rhode Island, Massachusetts and Connecticut. The remaining 10% is Woonsocket's own waste.

But as its customer base grew, so did the fines and penalties. Synagro Woonsocket was fined [\\$175,000](#) by the Department of Environmental Management in 2018 for excess pollutants and chemicals found in the water, including cyanide, dating back to 2014. [In 2021](#), a different subsidiary of the Baltimore-based company reached a \$373,660 settlement with the EPA for violating federal air pollution protections at its Woonsocket plant. [In July 2022](#), nine months before the state lawsuit, Synagro entered into another settlement with state environmental watchdogs for pollution problems with the incinerator, agreeing to pay \$20,000 for water treatment improvements in the Blackstone River, along with investing in infrastructure upgrades to its incinerator.

Since the state lawsuit in March 2023, the plant has remained under close monitoring by environmental regulators, with monthly inspections of operations and bacteria and pollutant discharge levels.

In 2024, the plant exceeded maximum state discharge allowances for phosphorus in the water [for six consecutive months](#), leading to several

warnings, but no fines, because the issues were considered “minor,” Haberek said.

“Overall, they’re doing better,” Haberek said. “Broad-brush, they’ve been meeting their permit limits.”

Odor complaints have persisted, though fewer than at the peak in 2023. Jacobs received 25 complaints about smells from the wastewater plant through July of this year — less than 25% of 107 documented in 2024, and under one-fifth of the 132 complaints made in 2023, according to an [Aug. 12](#) report to the City Council.

Transferring ownership of the sewage treatment service might reduce these occurrences, but it’s unlikely to scrub them entirely. Even the best-run wastewater treatment plants have occasional smells and discharge levels that exceed state permit caps, Haberek said.

### **Regional consequences**

What is guaranteed if the city shuts its incinerator: Dozens of local governments, manufacturers and other wastewater treatment facilities — including the Narragansett Bay Commission — will be forced to find an alternative place to send their sewage byproducts.

“We all rely on the Woonsocket incinerator as a disposal option,” Haberek said. “That would be problematic if they were to stop accepting biosolids.”

The [Cranston Wastewater Treatment Facility](#) is the only other wastewater treatment plant in Rhode Island with an incinerator, but it does not have capacity to handle Woonsocket’s load, Haberek said.

Beauchamp was unconcerned.

“Let everybody else figure it out,” he said. “It’s about time we put Woonsocket first.”

The city has not yet notified its municipal and commercial customers about the tentative plan to shut down the incinerator. However, last year, the City Council approved a separate, non-binding resolution to stop accepting liquid sludge from other cities and towns and companies, instead limiting its services to the already dried “cakes.” The switch, if made, would have affected about half of the existing incinerator customers. But it never advanced beyond the [May 22, 2024, council vote](#).

Lepizzera stressed that any changes, including closure of the incinerator and transfer of the wastewater treatment plant to a new owner, would not take effect immediately.

Gendron, the City Council president, does not share the same timeline.

“I would hope it would be done by Friday of this week,” Gendron said. “I am worried first about the health and wellbeing of the residents of Woonsocket. That’s where my real priority lies.”

Also factored into the calendar calculations: the July 1, 2027, deadline by which the city is contractually required to assume maintenance of the incinerator from Synagro, although the latter would continue to provide daily operating service through 2032 under the existing contract.

Beauchamp wants the transfer deal done before then.

“We know this incinerator is not going to get any better unless you put money into it,” he said. “We certainly don’t have that money. We don’t want to spend that money.”

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## Sewage-contaminated water made 60% of R.I. beaches unsafe for swimming in 2024

ENVIRONMENT, GOV & POLITICS | Jul 11, 2025 | 5:14 pm ET | By Nancy Lavin

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Beachgoers are shown at Narragansett Town Beach on June 22, 2025, during the recent period of very hot weather. (Photo by Laura Paton/Rhode Island Current)

Steven Spielberg never made a cult-favorite thriller about the dangers of sewage-infested waters.

But the amount of fecal matter lurking in the water surpassed federal safety recommendations at least one time in 2024 at nearly six in 10 of the 66 Rhode Island beaches tested, new data shows.

Even more alarming: 25 state and local beaches exceeded federal water quality safety thresholds on 25% or more of the testing days, according to a report published on July 7 by Environment America's Research & Policy Center.

"It's absurd in today's society we need to be worried about crap in the water, literally," said Rex Wilmoth, state director for the Rhode Island chapter of the nonprofit research and advocacy firm. "Even one day is one day too many."

Wilmouth unveiled the disturbing findings at a press conference at Oakland Beach in Warwick Friday morning. The Rhode Island Department of Health closed the city-run saltwater beach on June 24 due to high bacteria counts, though it was reopened two days later. On Thursday, two other Warwick swimming areas, at City Park and Conimicut Point beaches, were closed due to high bacteria accounts detected by the Rhode Island Department of Health.

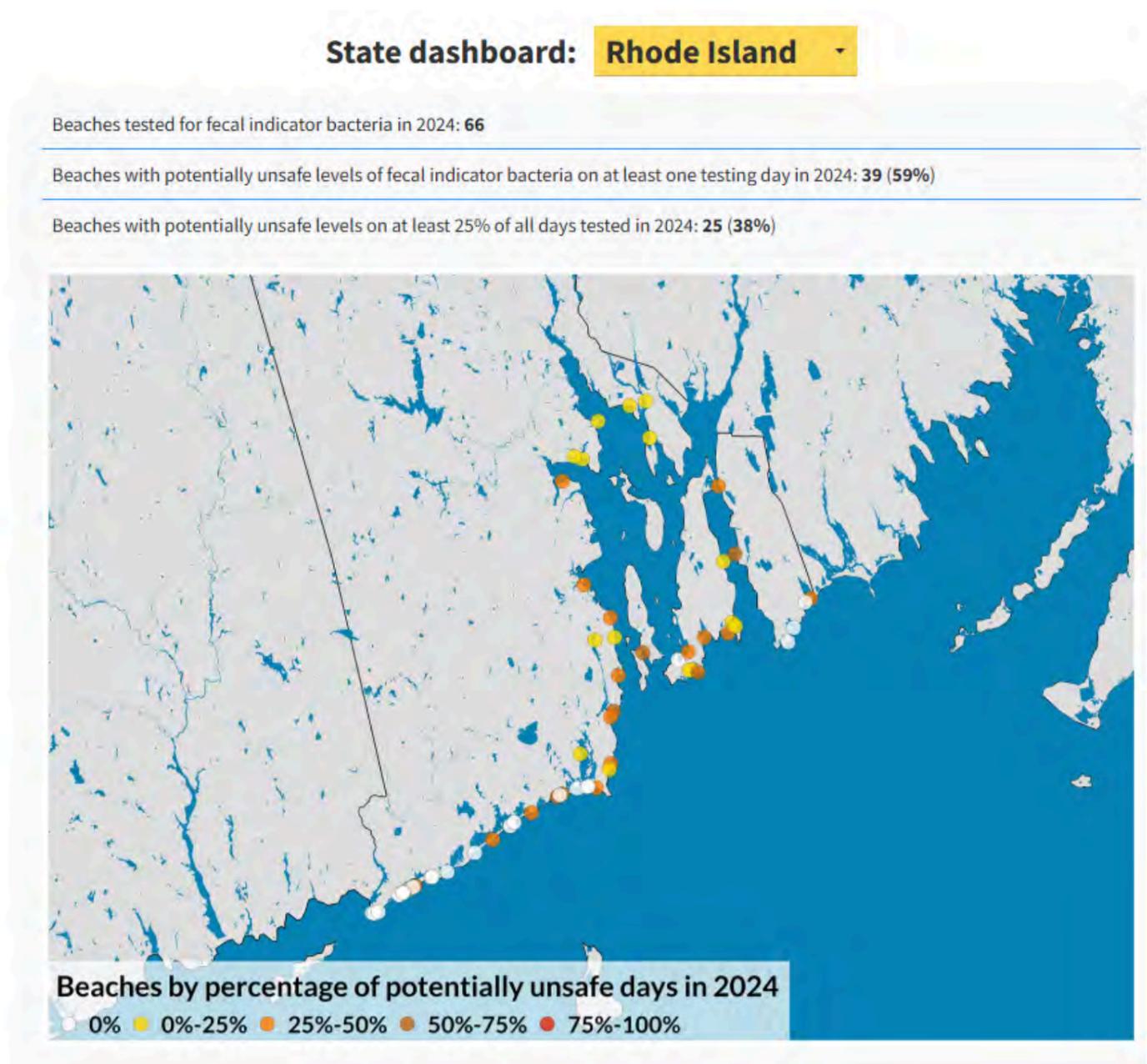
The state health department samples and tests water at state and local saltwater beaches during the summer season each year and notifies the public if unsafe bacteria levels are detected. Swimming in contaminated water can cause gastrointestinal illnesses, respiratory disease, eye and ear infections and skin rashes, with an estimated 57 million cases of illness nationwide each year. However, a majority of the illnesses go unreported.

Environment America's report compares state and federally reported levels of fecal contamination against the U.S. Environmental Protection Agency's health safety threshold, or Beach Action Value, to determine which beaches may pose health risks to swimmers, and how often.

Of the 3,187 beaches tested nationwide in 2024, 61% showed unsafe levels of contamination on at least one testing day. And one in seven of those tested were marked by dangerous levels of bacteria at least 25% of testing days.



Rex Wilmouth, state director for the Rhode Island chapter of Environment America, is shown at the press conference at Oakland Beach in Warwick Friday, July 11, 2025. (Contributed photo)



Nearly six in 10 of the 66 Rhode Island beaches analyzed by Environment America were marked by one or more days of potentially unsafe bacteria levels in 2024. (Courtesy Environment America)

And that's just on days when waters were sampled – suggesting infected waterways were contaminated even more often than data suggests, Wilmouth said. Take Tiverton's Fogland Beach, for example, which surpassed the federally recommended bacteria cap on five of seven days it was tested in 2024.

“There were a lot more days it was probably unsafe as well,” Wilmouth said.

Other repeat offenders in 2024 included Matunuck Town Beach in South Kingstown and Jamestown’s Mackerel Cove Beach, which both exceeded recommended bacteria levels on roughly two-thirds of testing days, along with Narragansett’s members-only Dune’s Club. State-run beaches were not immune either: Scarborough State Beach North showed unsafe levels of bacteria on 38% of the 24 testing days, according to the data.

“The ocean doesn’t care if it’s a wealthy area or not,” he said. “People can get really sick.”

The ocean doesn’t care if it’s a wealthy area or not,” he said. “People can get really sick.

– Rex Wilmouth, state director for the Rhode Island chapter of Environment America

Water pollution has become an increasing problem nationwide as a result of development that increases the risk of stormwater runoff flowing into coastal waters, and aging sewer infrastructure prone to overflows and spills.

In 2024, Rhode Island saw 171 days of one or more beach closures over a beach season marked by nearly 15 inches of rain, according to state health department data. The year 2023 was marked by 246 days of one or more beach closures – the highest since 2006, when there were 351 closure days.

So far this year, five local beaches have been closed for a combined 22 days – not including this week’s closures at swimming areas that have not yet reopened in the wake of recent, heavy rainfall.



There were 171 days in which one or more Rhode Island beaches closed in 2024 due to elevated bacteria levels. Years marked by more rainfall generally corresponded with more frequent or prolonged beach closures. (Courtesy of the Rhode Island Department of Health)

Temporary beach closures are more than just an inconvenience to swimmers; they also jeopardize a key part of the state’s tourism-dependent economy, and that of shellfishermen, whose livelihoods depend on access to key fishing grounds free from contamination.

“We’re the Ocean State,” Wilmouth said. “We need to make sure we are not polluting our waterways.”

The solution relies largely on federal and state funding, both for regular water quality monitoring, and even more importantly, sewage and stormwater infrastructure upgrades that can minimize overflows and prevent polluted runoff from seeping into public waterways. The 2021 Infrastructure Investments and Jobs Act provided \$27.4 billion in direct funding and future appropriations for sewage and stormwater projects nationwide. But some of that funding is now at risk under actions taken by the Trump administration. Meanwhile, the EPA pegs the total cost for necessary wastewater infrastructure at \$630 billion.

Environment America's annual data release on unsafe bacteria levels in swimming waters comes with a new call to action this year: asking residents in each state to sign a petition urging their governors to set firm deadlines for ensuring state waters are safe for swimming, fulfilling a goal set by the Clean Water Act in 1983.

The number of people who signed the petition in Rhode Island Friday was not immediately available.

Wilmouth acknowledged the progress that Rhode Island, and its municipalities, have made toward wastewater infrastructure upgrades, such as the Narragansett Bay Commission's Combined Sewer Overflow project. Now in its third and final phase, the decades-old, \$1.7 billion project relies on a network of underground tunnels that will run over 5 miles once completed to capture sewage and stormwater runoff during heavy rainfall and prevent it from being released untreated into the bay. The project is expected to be finished in 2026.

"We need to continue doing things like that," Wilmouth said of the federally mandated project. "The biggest thing is having the funding. These are not small, or inexpensive projects."

But, he added, the health risks to swimmers from frolicking in fecal waters are preventable.

"I shouldn't be releasing a report like this in today's world," he said.



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# Warren council approves sludge-management contract with Veolia amid PFAS testing concerns

5073587 · June 24, 2025

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June 25, 2025-Special Town Council Meeting



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At a June 25 special meeting, the Warren Town Council approved a contract with Veolia Water North America Northeast LLC to accept the town's sewage sludge. Council members and the town solicitor discussed limits on Veolia's liability, PFAS testing requirements and the lack of alternative disposal options in Rhode Island.

The Warren Town Council voted to approve a sludge-management contract with Veolia Water North America Northeast LLC at a special meeting June 25.

Council members discussed why the contract was urgent, the town's limited disposal options and provisions that require testing for PFAS, the group of persistent chemicals often called "forever chemicals." Solicitor Desisto said the contract contains indemnification provisions that favor Veolia and warned that if Veolia's facility cannot accept sludge the town would need to secure alternative disposal arrangements at its own expense.

The contract was described as time-sensitive because Veolia's Cranston facility has limited capacity. "They favor Veolia, but they're providing the service," Solicitor Desisto said, adding that the town would have to make other arrangements if the facility were shut down. He also noted the agreement includes provisions for PFAS testing and that the town may need to perform pretesting before Veolia begins accepting sludge.

Council members pressed staff on monitoring and costs. According to staff member Eric, the town has already submitted an initial PFAS test required before the contract begins; comprehensive PFAS testing currently costs about \$650 per test through Broadon Analytical. "As of right now, it's \$650 for one test or comprehensive PFAS," Eric said. Solicitor Desisto said he believes state legislation on PFAS will take effect July 1, 2029, and that future regulation could make testing more frequent and costly.

Councilors noted that, at present, Veolia is effectively the only company in Rhode Island taking municipal sludge. "Veolia is the only one right now," a council member said. The council discussed longer-term alternatives: the Narragansett Bay Commission is exploring a dewatering facility that could become a secondary disposal option in the future, and out-of-state options exist but were described as expensive because of transportation and regulatory hurdles.

Council members also discussed operational details of the contract. Eric said typical truckloads are about 9,000 gallons and cost about \$460 per load to transport to the processor; the town averages roughly two to five truck drops per week depending on flow. Dewatering and incineration are handled by the processor (named in the discussion as Synabro/Synagro), and sludge must be kept below roughly 6% solids for transport. Staff estimated a 9,000-gallon load converts to roughly 1 to 3 dry tons depending on solids content.

During discussion, a council member encouraged staff to continue exploring alternatives with neighboring authorities such as the Bristol County Water Authority and the Narragansett Bay Commission, but no formal agreement to pursue a specific alternative was recorded. The council then moved to approve the contract; a motion was made, seconded and carried by voice vote.

Action: A motion to approve the sludge-management contract with Veolia passed by voice vote; the minutes record the motion, a second and the chair's call for the ayes but do not record roll-call tallies.

The meeting ended after the vote. Councilors asked staff to maintain monitoring and to continue evaluating longer-term disposal options as those opportunities develop.

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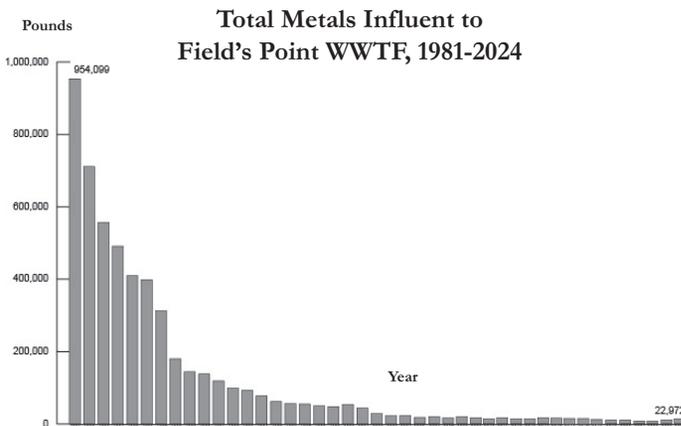
# PUBLIC NOTICE

## Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Section 1.10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2023 through December 31, 2024. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

### Significant Non-Compliance Criteria:

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



THE NARRAGANSETT BAY COMMISSION IS COMMITTED TO PROTECTING THE STATE'S TWO LARGEST WASTEWATER TREATMENT FACILITIES AND NARRAGANSETT BAY FROM TOXIC DISCHARGES. This is accomplished by the issuance of discharge permits to commercial and industrial sewer users. These discharge permits specify the level of pollutants that can be discharged in a facility's wastestream and may require a firm to conduct wastewater monitoring to verify compliance with discharge limits, to implement a Spill Control Plan and/or Toxic Organic/Solvent Management Plan, and to install pretreatment equipment. Various reporting and record keeping requirements may also be written into discharge permits. The firms listed in this public notice violated one or more of the significant non-compliance criteria specified above. The Commission is required by the RI DEM and the US EPA to annually publish the names of all firms violating any of these criteria. Therefore, firms must be sure to comply with all the terms specified in their discharge permit to ensure that the name of their firm is not listed in this annual public notice. The NBC offers FREE technical assistance to firms located in the NBC service area through its non-regulatory Pollution Prevention assistance program. For information on how the NBC can help your firm achieve and maintain compliance, contact the NBC Technical Analysis and Compliance Section at 461-8848/TDD 461-6549 to schedule a free Pollution Prevention audit.

Most businesses located in the NBC district are to be commended for the fine job they have done treating their process discharges to remove toxic pollutants. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel and zinc and 80,440 pounds of cyanide to the Field's Point Wastewater Treatment Facility. Since 1981, the total metals and cyanide loadings to the Field's Point facility have been reduced by 97.6% and 98.4% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility.

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

### Bucklin Point Service Area

Pawtucket		
Company Name	Violations Cited	Present Status
Kitchen & Countertop Center of New England	Failure to submit report on time (6)	Report has not been received
New England Paper Tube Co.	Failure to submit report on time (6)	Report has been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received
Lincoln		
Bento Nouveau	Failure to submit report on time (6)	Report has been received
Chemart Company	Failure to submit report on time (6)	Report has been received
Denison Pharmaceuticals, LLC	BOD (1,2) TTO (1,2)	Firm is still experiencing compliance issues
Palate Pack	Failure to submit report on time (6) Failure to submit report on time (6)	Report has been received Report has been received
Cumberland		
Cintas Corporation	TTO (1,2)	Firm is still experiencing compliance issues
East Providence		
Aspen Aerogels Rhode Island, LLC	TSS (1,2) Failure to submit report on time (6)	Firm is now in compliance Report has been received

### Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
AS220 (Print Shop)	Failure to submit reports on time (6)	Reports have been received
Ira Green, Inc.	EPA - CN (2)	Firm is now in compliance
Luluna Health, LLC	Failure to submit reports on time (6)	Reports have not been received
Mahr, Inc.	Cr (2)	Firm is now in compliance
Providence Brewing Company, LLC	BOD (1,2)	Firm is now in compliance
Providence Specialty Products, LLC	Failure to submit reports on time (6) BOD (1, 2)	Reports have been received Firm is still experiencing compliance issues
Quality Spraying Technologies	Failure to submit report on time (6) Failure to submit report on time (6)	Report has been received Report has been received
Johnston		
Granitec Marble and Granite LLC	Failure to submit report on time (6)	Report has been received
R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received

NARRAGANSETT BAY COMMISSION

# Perfect Compliance

*in recognition of Significant Industrial User Perfect Compliance in 2024*

**The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2024:**



Armbrust International, Ltd.	Hindley Manufacturing Company
HP Services, Inc.	Manchester Street, LLC
John H. Collins & Sons Company	Materion Technical Materials, Inc.
Metallurgical Solutions, Inc.	Narragansett Jewelry Co., Inc. dba C & J Jewelry Co.
Providence Metallizing Company, Inc.	Rhode Island Heat Treating & Black Oxide Company, LLC
Rhode Island Resource Recovery Corporation	Stackbin Corporation
Tanury Industries PVD, Inc.	Technodic, Inc.
Tedor Pharma, Inc.	The Okonite Company
Truex, Inc.	Univar Solutions USA, Inc.

---

**Has your company demonstrated extraordinary environmental efforts this year?**

If so, apply for an NBC Environmental Merit Award! Download an application form at [www.narrabay.com](http://www.narrabay.com).

**Vincent J. Mesolella**, *Chairman* • **Laurie A. Horridge**, *Executive Director*  
**One Service Road, Providence, RI 02905**  
**401-461-8848 • [www.narrabay.com](http://www.narrabay.com)**

# ***NBC NEWSLETTERS***



# NBC Pipeline

## January 2025

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

### Calendar of Events *for January*

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

### Oil Fire in Port of Providence

On Thursday, December 26, an explosion and subsequent fire in a corn oil tank just north of the NBC Field's Point campus brought firefighters from Providence, Cranston, Johnston, Cumberland, East Providence and North Smithfield to the scene.

Fortunately, no one was hurt and the property damage was limited to the oil tank. NBC's safety team is currently reviewing and updating NBC's Emergency Action Plans. Any revisions will be announced, but you can view the current plans in SharePoint [here](#).



# News Briefs...

## NBC Plays Santa for Children's Friend

NBC staff once again showed their generosity with contributions to the Children's Friend Spirit of Giving Holiday Drive.

We collected enough winter coats, gloves, hats scarves, boots, warm socks and toys, games, and books to fill Santa's sleigh (or at least a red MINI Cooper).

In addition, a \$500 donation was made from the NBC's Casual Day Charitable Giving Fund.



## Welcome

**Bryan Blackmore**  
Mechanic 1 - FOP

Bryan is from Scituate, RI and has three dogs.



**Rebecca Songolo**  
Pretreatment Inspector

Bekki originally hails from East Providence but has spent the last three years in Zambia with her family (welcome back, Bekki!!!). She served in the Peace Corps and loves to travel.



Congratulations to Safety Compliance Coordinator **Dave Aucoin** on his election as President of the Safety Association of Rhode Island! SARI brings its members national viewpoints and local expertise in the fields of safety, occupational health, and environmental management.

## RIBRIDGES System Data Breach

On December 30, RI Governor Dan McKee confirmed that at least some of the data breached from the RIBRIDGES system had been released to the dark web.

In the wake of the breach, Attorney General Peter Neronha released his own advisory for anyone worried about identity theft, whether from this cyberattack or just in general.

His recommendations:

- Check your bank and credit card statements regularly for any unusual charges.
- Report any unauthorized charges, no matter how small, to your bank or financial institution.
- Shred all credit card offers, bank and credit card statements, household bills, and all other mail or paperwork that includes personal identifying information before you toss it in the trash.
- Check your credit report once a year for any changes. You can get a free copy of your credit report every 12 months from the three main credit reporting agencies: Equifax (800-525-6285), Experian, (888-397-3742), and TransUnion, (800-680-7289).

If you suspect you are the victim of fraud, in addition to the regular monitoring above, Neronha's office recommends:

- Contact the fraud department of any one of the aforementioned credit bureaus and place a 90-day fraud alert on your credit file that requests creditors contact you before opening new accounts or making changes to existing accounts.
- Close the accounts that you know or believe have been tampered with.
- File a police report.
- File a complaint with the Federal Trade Commission at 877-382-4357.



**Happy  
Holidays**



**We enjoyed good  
food and reindeer  
games!  
Look for more  
photos next month!**



## **Safety Corner: Cold Weather Protection**

Anyone working in a cold environment may be at risk of cold stress. What constitutes extreme cold and its effects can vary across different areas of the country. In regions that are not used to winter weather, near freezing temperatures are considered “extreme cold.” A cold environment forces the body to work harder to maintain its temperature. Whenever temperatures drop below normal and wind speed increases, heat can leave the body more rapidly.

Wind chill is the temperature the body feels when air temperature and wind speed are combined. For example, when the air temperature is 40°F, and the wind speed is 35 mph, the effect on the exposed skin is as if the air temperature was 28°F.

Cold stress occurs by driving down the skin temperature and eventually the internal body temperature (core temperature). This may lead to serious health problems, and may cause tissue damage, and possibly death.

Proper planning can reduce susceptibility to cold dress:

- Select proper clothing for cold, wet, and windy conditions. Pack extra clothes as moisture can increase heat loss from the body.
- Know the symptoms of cold stress: Changes in skin color, tingling, pain, swelling, leg cramps, numbness, blisters, confusion, shivering, and memory loss, among others.
- Take frequent short breaks in warm dry shelters to allow the body to warm up.
- Perform work during the warmest part of the day.
- Avoid exhaustion or fatigue because energy is needed to keep muscles warm.
- Drink warm beverages and avoid caffeine or alcohol.



For more information on safely preparing for the cold, check out OSHA’s site on Winter Weather Preparedness and its Cold Stress Guide.

—submitted by Kelsie Breyer



# NBC Pipeline

February 2025

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## Calendar of Events *for February*

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

# News Briefs...

Welcome...

## Meet Paul Bechard!



Paul Bechard is NBC's new Mechanic I at Field's Point. Paul is from Pawtucket, RI, the birthplace of the Industrial Revolution. He and his wife have four children. Paul enjoys playing the guitar daily

to de-stress.

## Meet Daniel Heu!



Dan started as an NBC Pretreatment inspector in January. Dan is from Providence but was born in Modesto, California but most of his family currently resides in the Midwest now. Dan is a big fan of sports, outdoor activities and fried green tea ice cream.

## Meet Elijah Lavoie!



Elijah started in January as a BP Operator I. He comes from a big family and has 4 brothers and 2 sisters. Elijah is from Pawtucket, RI and enjoys playing video games in his free time. He hopes to visit

the island of Cape Verde one day.

## Meet Viviana Montoya!



Viviana started as a fiscal clerk in January. She loves Spanish food and salsa dancing. A bucket list item of hers is to hopefully one day visit Peru. Some of the best advice shes ever receivd is to

*"treat people how you want to be treated"*.

## Meet Leitson Barbosa!



Leitson aka Leo started in January as a FP Operator I. He is from Boston, MA and enjoys playing soccer and going to the gym.

## Game Day Recipe

### Easy Buffalo Chicken Dip



#### Ingredients:

- (8-oz.) pkg. cream cheese, softened
- 4 oz. sharp Cheddar cheese, shredded (about 1 cup)
- 4 oz. pepper Jack cheese, shredded (about 1 cup)
- 1/2 cup refrigerated bottled ranch dressing
- 1/2 cup hot sauce (such as Frank's RedHot)
- 3/4 tsp. black pepper
- 1/2 tsp. garlic powder
- 4 cups chopped cooked chicken (from 2 rotisserie chickens)
- 1/2 cup thinly sliced scallions (from 4 scallions), divided
- Cooking spray
- 3 oz. blue cheese, crumbled (about 3/4 cup)
- Carrot sticks, celery sticks, pretzel chips, for serving

#### Directions:

Mix dip ingredients.

Preheat oven to 350°F. Stir together cream cheese, Cheddar cheese, pepper Jack cheese, ranch dressing, hot sauce, pepper, and garlic powder in a large bowl until well blended. Gently fold in chicken and half of the scallions.

Add dip to baking dish.

Transfer to a lightly greased (with cooking spray) 13- x 9-inch baking dish. Smooth top, and sprinkle evenly with blue cheese.

Bake in preheated oven until center is hot and edges are bubbly, 20 to 25 minutes. Remove from oven, and top with remaining scallions. Serve with carrots, celery, and pretzel chips.

— Recipe & Photo by [Southernliving.com](http://Southernliving.com)

## Wishing Richard Mello and George Dolan, Long Time FP Employees, a Happy Retirement!



*From left to right: Jack Fascitelli, Nathan Boiros, Ricky Mello, George Dolan, Eric Bogosian, Esther Levia.*

On January 21st, NBC celebrated two long-time NBC employees on their upcoming retirements. Field's Point Process Monitors Ricky Mello and George Dolan retired on January 31st, Ricky worked for NBC for over 35 years and George, over 34 years. Their dedication, expertise and knowledge in plant operations and process monitoring will sorely be missed.

NBC staff and some past retirees, celebrated with pizza and cake in their honor. Thank you Ricky and George for your many years of service at NBC, wishing you all the best in your retirement!



*From left to right: Ricky Mello & George Dolan*

## Sunken Crane Removed from the Providence River

IM Manager **Tony DiIorio** captured this awesome shot of the sunken crane barge starting to be removed from the Providence River. The sunken crane has been sitting in the Providence river for eight years.



DEM removed the crane cab over the weekend of February 1st and will continue to work on removing the sunken barge over the next few weeks.

Parts of the crane will be sent to a Providence steel yard where some of the parts will be used for artwork.

## Assistant Construction & Engineering Director Kathryn Kelly Receives Alfred E. Peloquin Award from NEWEA

Congratulations to Assistant Director of Construction and Engineering, **Kathryn Kelly** on receiving the Alfred E. Peloquin award from the New England Water Environment Association (NEWEA) at the Annual Conference in January.

The Alfred E. Peloquin award recognizes an individual whose personal service has contributed to excellence in plant operations either directly at a treatment plant, or indirectly through assistance to plant operations personnel.

Kathryn has been a leading force for NBC's CSO project, leading to improvements in the Providence and Seekonk Rivers, as well as further down the Bay.



*From left to right: Scott Goodinson & Kathryn Kelly.*

## Bucklin Point WWTF Biogas Combined Heat & Power (CHP) Startup

Wastewater treatment operations are very energy intensive and as energy costs continue to rise, particularly in the Northeastern U.S. where electricity prices are often over 50% higher than the national average, energy management is an increasingly critical operational issue. NBC's Field's Point WWTF, the largest in the State of Rhode Island and the second largest in New England, has a peak electrical power demand of 2.0 Megawatts. NBC's Bucklin Point WWTF, the second largest WWTF in Rhode Island, has a peak electrical power demand of 1.5 Megawatts. As such, NBC is one of the top 20 users of electricity in the State of Rhode Island.

In 2005, NBC began to study the potential use of available renewable energy resources at both the FP WWTF and BP WWTF. As a result of these studies, NBC successfully erected three 1.5-Megawatt wind turbines at the FPWWTF in 2012 and completed construction on the biogas Combined Heat and Power (CHP) at BPWWTF in 2018. In 2016, NBC purchased three additional 1.5-Megawatt wind turbines in Coventry, Rhode Island, and has since entered into several Power Purchase Agreements (PPAs) to purchase additional power from renewable sources. It is the NBC's long-term goal and desire to achieve 100% of the energy required for NBC operations from renewable sources. Upcoming projects to help reach this ambitious goal include a solar carport and transitioning the NBC fleet to electric vehicles.

A combined heat and power (CHP) system, also known as cogeneration, is a technology that simultaneously produces electricity and useful heat from a single fuel source, in NBC's case from methane gas produced in the sludge digestion process. The waste heat generated during electricity production is captured

to provide thermal energy for heating the sludge digester tanks, resulting in significantly higher energy efficiency compared to separate electricity and heat generation methods.

For various reasons, the CHP engine-generator has not operated for a prolonged period since it was constructed. This has been a notable concern, and NBC has investigated ways to make the unit operational over the past few years, but with limited success. While the CHP was originally designed to utilize digester gas, or a combination of natural gas and methane, as a fuel source, with the normal primary fuel being digester gas, the unit has only operated for very brief periods with digester gas only. The digester upgrade construction project, which is underway and scheduled to be completed in late 2025, also means that digester gas is temporarily unavailable for the CHP until the necessary construction improvements are completed and the rehabilitated digester complex is commissioned. To minimize continued downtime of the CHP, which makes it vulnerable to premature aging, NBC has teamed up with a consultant, Black & Veatch, and a specialized mechanical service provider, Martin Energy Group, to operate the CHP unit on natural gas only until such time as digester gas is available again.



Beginning in August 2023, NBC and its consultant began looking at the feasibility and economics of running the CHP solely on natural gas. The consultant's analysis indicated the cost to produce electricity utilizing natural gas was more cost effective than purchasing electricity. In response to this assessment,

— Continued on the next page

# Bucklin Point WWTF Biogas Combined Heat & Power (CHP) Startup Continued...

a mechanical service company was hired in May 2024 to properly tune the engine for continuous reliable operations on natural gas. The machine was run intermittently until September 2024 when the air emissions recertification was performed. In December 2024, NBC received notification from RI DEM that it passed the emissions test, and that NBC can operate the engine. On January 16th, 2025, the CHP began operating continuously on natural gas. The machine will now run on natural gas to produce electricity until the needed digester complex improvements are constructed. Once construction is complete, the machine will run on its intended fuel, digester gas (methane). To date the CHP has been running nearly flawlessly.

NBC Operations, Engineering, TAC, IT, Executive and Finance staff all played critical roles in accomplishing this task, and all were instrumental in working with NBC's consultant and service provider, either directly or indirectly, to get the CHP running continuously after all these years.

*-Submitted by the Engineering Team*

**SAFETY ALERT!**  
**WINTER FIRE SAFETY FACT SHEET**  
Narragansett Bay Commission

**MAIN CAUSES OF WINTER FIRES AND HOW TO PREVENT THEM**

**Space Heaters:**  
Keep space heaters at least three feet from anything flammable, such as furniture, bedding, and curtains. Always turn them off when you leave the room or go to sleep.

**Fireplaces and Wood Stoves:**  
Have your chimney inspected and cleaned annually. Use a fireplace screen to prevent sparks from escaping.

**Furnaces:**  
Have your furnace inspected and serviced by a qualified professional each year.

**Smoke Alarms:**  
Install smoke alarms on every level of your home, inside bedrooms, and outside sleeping areas. Test them monthly and replace batteries at least once a year.

**Escape Plan:**  
Develop and practice a home fire escape plan with all members of your household.  
[Make A Plan Ready.gov](http://MakeAPlanReady.gov)

**Fire Extinguishers:**  
Keep a multipurpose fire extinguisher in an accessible location. Know how to use it. [PASS](http://PASS)

**DO YOU REMEMBER HOW TO OPERATE A FIRE EXTINGUISHER?**

PULL!  
AIM!  
SQUEEZE!  
SWEEP!

**FOR MORE INFORMATION:** [Winter Fire Safety Tips](#) | [Winter Fire Prevention Tips](#)



To IM Operator III **Pete Jarest** on the birth of his first grandchild!

Pete's daughter Gracie and her husband Chris welcomed baby boy Noah Joseph Moniz on December 7, 2024 weighing 8lbs 3oz.

The new family of three are doing well and Noah will call Grandpa Pete, Pepere!



To IM Manager **Tony DiIorio's** son Joseph DiIorio on receiving the 2025 First-Class Commendation award from the Warwick Police Department. This award is a recognition for exceptional service and dedication

Joe is police officer for Warwick, RI. On January 5, 2024 Officer DiIorio attempted to initiate a traffic stop which then lead to a high speed chase, ending in a crash, where Officer DiIorio was able to make the arrest. All taking place after the culprit robbed the TD Bank on West Shore Road in Warwick.



Great job Officer DiIorio and congratulations!



# NBC Pipeline

March 2025

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## Calendar of Events *for March*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
 Daylight Savings Time Begins					Full Moon  Payday	
16	17	18	19	20	21	22
	 St. Patrick's Day	BOC Meeting 11 AM COB	First Day of Spring ..... St. Joseph's Day	Employee Appreciation Event FP: 1 - 3 PM BP: 11 AM		 World Water Day
23	24	25	26	27	28	29
	Blood Drive COB 9 AM - 12 PM				Payday	
30	31					

# News Briefs...

Welcome...

## Meet Hans Glaudin!



Hans Started in February as an IM Operator II. He is from Providence and enjoys being active; exercising, playing basketball, and traveling. One of the most adventurous things he has ever done is mountain climb.

## Meet Julie Burns!



Julie started in February as a Lab Technician. She's from Warwick. She's a lover of coffee ice cream, swimming, playing video games and reading mystery novels. One of her bucket list items is to hopefully travel to New Zealand.

## Meet Jacqueline DiLibero!



Jackie is NBC's Deputy CFO. She resides in West Greenwich with her husband and daughter. They enjoy spending time outdoors and visiting the local beaches together. Chocolate

ice cream is her favorite. Some of the best advice shes ever received; *Never stop learning, growing and always be kind to everyone.*

## Mark your Calendars: RI Clean Water Week April 6th - 12th.

NBC will be celebrating RI's Clean Water Week with an Open House on **Saturday, April 12th 10 AM - 2 PM**, offering public tours and other clean water activities, more details to come!



**Rhode Island Blood Center**

# Blood Drive

**Narragansett Bay Commission**  
**Monday, March 24**  
**9:00am-12:00pm**

COB Main Conference Room  
1 Service Road, Providence

800.283.8385 • [ribc.org](http://ribc.org)

**Prepare to donate**

- Eat well and hydrate
- Bring a photo ID
- Feel good and symptom free
- Must be 17+ or 16 with parental consent form
- Meet minimum weight requirements

For full eligibility requirements and COVID-19 information, visit [ribc.org/eligibility](http://ribc.org/eligibility).

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

Facebook, Instagram, Twitter, YouTube icons

## NBC's Beloved Lucy has Passed

Lucy sadly passed away on Monday, February 24th. Lucy was a Parrot Fish. She lived well beyond the 10-15 year life expectancy for this type of fish. She was estimated to be around 18 years old and had been living in NBC's fish tank at the COB for all those years.

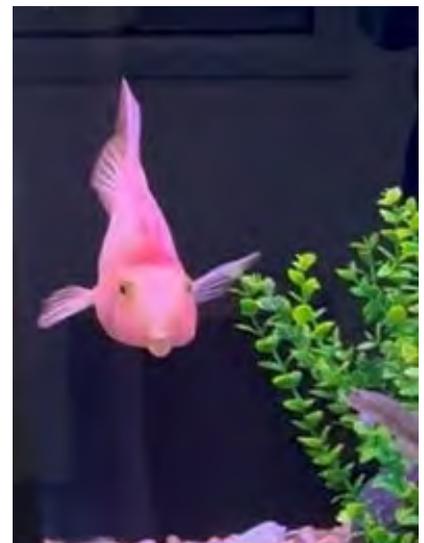


Photo Credit: Andrea DiCicco

Lucy was a "people fish", she'd follow you and swim right up to the glass to greet you. She loved being fed. She was always welcoming and caught everyone's attention when entering reception. You will be missed, Lucy!



A big shout out and thank you to NBC's snow operations team, **Pete Jarest, Dave Weisman, Norm Rodolewicz, Juan Andujar, Mike Smith and Ryan Porter**, for all their hard work so far this winter clearing all the snow on the NBC's Providence campus and other NBC facilities off campus.



— Submitted by Brian Blais

## Thank you to all our Supportive Board of Commissioners

Nine of NBC's Board of Commissioners were up for reappointment and were unanimously approved during the senate hearing on February 26th. (Yay!)

NBC could not be more grateful for the support we receive from our fellow Commissioners. These Commissioners said wonderful things about NBC and all of our staff and we are so grateful.



To watch the footage from the hearing visit: [Capitol TV](#)

## Congratulations to NBC's Field's Point & Bucklin Point



NBC's Field's Point and Bucklin Point received the NACWA Peak Performance Silver Award for 2023.

The Peak Performance Awards recognizes NACWA member agency facilities for excellence in permit compliance. The

Silver Awards are presented to facilities with no more than five violations per calendar year.

Fifty percent of all NACWA Public Utility Members had facilities that earned Peak Performance Recognition for the 2023



*Field's Point*

calendar year. Out of 353 NACWA Public Utility Members, 196 Members had 510 facilities or plants that achieved Peak Performance across the country.

Operations managers and staff from both facilities were recognized at the February board meeting for their excellent work, congratulations to all!



*Photo Credit: Peter Goldberg, Bucklin Point*

## ES&C Holds First Employee Recognition Program Ceremony

NBC's ES&C held its first Employee Recognition Program Ceremony on February 13th. The Program started January 1, 2024 and employees had all of 2024 to submit their nominations for *Employee of the Year* and *Team of the Year*. The winners were nominated by peers within the ES&C division and nominations were based on employees who display professionalism, teamwork and who go above and beyond their everyday job duties.

**Gerard Hamel** received the Employee of the Year award for 2024. Gerard embodies everything you would value in a colleague; reliability, positivity, and an unwavering willingness to help coworkers. No matter the challenge, he is always there, ready to lend a hand, share his expertise, and support his team. His positive outlook is contagious, making even the busiest days a little brighter for those around him. Beyond simply getting the job done, Gerard goes above and beyond, ensuring that his coworkers feel supported in tasks. His dedication to teamwork and excellence has made a lasting impact on the Environmental Team.



**Mike Golenia, Amanda Kezirian, Tyler Bissonnette & Jeff Tortorella** received the Team of the Year award for 2024. While sampling on Narraganset Bay, the EM sampling team saw youths in peril by the hurricane barrier. Their motor wasn't working, their oar had broken, there were no cell phones on their boat, and they were in distress. The sampling team towed them into the Pawtucket boat ramp. These instances underscore the dedication and quick thinking of EM personnel who went above and beyond to save youths having trouble on the water. Their training, skills, and courage turned what could have been a tragedy into a story of hope and resilience.



*From left to right: Amanda Kezirian, Tyler Bissonnette, Jeff Tortorella, & Mike Golenia.*

Congratulations to all!

## NBC Receives NACWA Environmental Achievement Award for Community Leadership.

NBC was presented the NACWA Environmental Achievement Award for Community Leadership at the annual winter conference. This award was specifically given for the work NBC has done on green infrastructure projects in Central Falls.

Two new recreational facilities were completed in part of the CSO Phase III project for Central Falls. Improvements to the sewer and drainage system under both fields were made to redirect stormwater runoff and ensure better water quality in the Blackstone River. Once underground work was completed, both fields received a total makeover, giving central fall two beautiful new recreational facilities for their community to enjoy.



*Deputy Director Jim McCaughey accepted the award on behalf of NBC, pictured with Susan Pekarek, NACWA Board Member & Chair of NACWA's Awards Committee*



Mark your calendars for NBC's next employee appreciation event.

**Thursday, March 20th,  
Bucklin Point: 11 AM**

**Thursday, March 20th, Field's Point: 1-3 PM**

Please coordinate with your supervisor to attend.



## Safety Corner

No one will protect you better than **YOU!**

When you're at work, don't be a fool,  
Stay safe from harm and follow the rules!

Wear your gloves and sturdy shoes,  
Take care of YOU, please don't refuse!

Lift with care, don't strain your back,  
Take those breaks and stay on track!

Whether tasks are big or small,  
Follow safety protocol!

Stay aware and it's guaranteed,  
That YOU will avoid complacency!




By: Kelsie Bryer 2005

## Check Out Cleaning up Narragansett Bay

An article NBC has been waiting for: Municipal Sewer & Water Magazine featured NBC's CSO Abatement Project as their cover story in the February issue.



*From left to right: Dave Bowen, Kathryn Kelly, Laurie Horridge, Vin Mesolella & Jim McCaughey*

The article talks about the remarkable turnaround of Narragansett Bay thanks to the work of NBC. Field's Point in the early 1980's was one of the worst municipal polluters in the New England area, now we can proudly say the Bay is the cleanest its been in over 150 years. The shell-fishing industry sees an extra 40 days of work per year, beach closures are down 80%, fishing grounds in the upper Bay that have been closed for more than 70 years are now open and bacteria levels are down significantly.

In 2001 NBC began Phase I of the CSO project, constructing its first deep-rock tunnel in Providence to divert stormwater to the Field's Point facility reach-



ing completion in 2008. Phase II was completed in 2015 which consisted of installing two CSO interceptors that connect to the tunnel in Providence and Phase III which consisted of constructing another deep-rock tunnel to divert stormwater to Bucklin Point is on schedule to be on-line in 2028. Construction of four drop shafts and a pump station is still in the process of being completed.

To read the full article visit: [Cleaning Up Narragansett Bay](#)  
Photo Credits: Municipal Sewer & Water Magazine



# NBC Pipeline

April 2025

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## Calendar of Events *for April*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	
		1	2	3	4	5	
		April Fool's Day					
6	7	8	9	10	11	12	
		RI Clean Water Week April 6th - April 12th					FP Open House 10 AM - 2 PM
						Full Moon	
					Payday	Passover Begins	
13	14	15	16	17	18	19	
		Clean Water Student Activities 10 AM - 2 PM					
Palm Sunday		Tax Day			Good Friday		
20	21	22	23	24	25	26	
 Easter		 Earth Day					
Passover Ends					Payday		
27	28	29	30				
		BOC Meeting 11 AM COB					

# News Briefs...

Welcome...

Meet Brandon Leclair!



Brandon started as the new Field's Point Mechanic in March. He is from Killingly, CT. Chocolate ice cream is his favorite. Brandon hopes to visit Germany one day, something he's had on his bucket list.

Meet Mark Archambault!



Mark likes to go by Arch and will be Bucklin Point's E&I Technician II starting on April 6th.

# Congratulations...

To Assistant Customer Care Research Supervisor **Gary Gannon's** son Brendan on graduating from Bryant University's PA Program.



Congratulations & best of luck!

# Celebrate RI Clean Water Week with NBC

Join us for an Open House at Field's Point in celebration of RI's Clean Water Week on Saturday, April 12th from 10 AM - 1 PM.



The NBC will be offering free public tours starting at 10 AM every half hour with the last tour at 1 PM. Tours will include the Field's Point waste water treatment process, a look at the region's most sophisticated water quality science building, "touch-a-truck" and "touch-a-boat" with the NBC's maintenance and research vehicles, pipe walk through and more. In addition, the NBC will issue certificates of completion to all students who take the tour that may be redeemed for extra credit at school (but students are advised check with their teacher first).

Staff are encouraged to bring family and friends. To book your tour please email [nbcpr@narrabay.com](mailto:nbcpr@narrabay.com). Space is limited



The NBC joins four other clean water agencies in Rhode Island offering free public tours during Rhode Island Clean Water Week. Information on other tours is available at [ricwa.org](http://ricwa.org)

**RHODE ISLAND CLEAN WATER ASSOCIATION**  
RICWA EST. 1982

**EARTH DAY CLEANUP**  
**KETTLE POINT PARK**  
**EAST PROVIDENCE**

**Join Us!**  
**Saturday April 26, 2025**  
**9-12pm**

Volunteer for Earth Day!  
Bring a reusable water bottle!  
Join us for refreshments!

RSVP : [ricwa@ricwa.org](mailto:ricwa@ricwa.org) by April 12th  
Rain Date: Sunday, April 27th  
All must sign a waiver to participate

**The Narragansett Bay Commission**  
**United Rentals**  
All supplies will be provided

Overflow Parking  
University Orthopedics  
1 Kettle Point Avenue  
East Providence, RI

## 2025 Earth Day River Clean-up Grant Recipients

The NBC is looking forward to celebrating Earth Day this April with all of the 2025 Earth Day River Restoration grant recipients.

Each year hundreds of volunteers from local organizations gather in April to remove thousands of pounds of tires and debris from the beds and banks

of the rivers, ponds and shorelines, as well as creating restoration and/or beautification projects for RI during these annual Earth Day clean ups. The goal is to help these organizations improve our local communities.

Grantees for 2025 include: Neutaconkanut Hill Conservancy, Inc., The Squantum Association, City of Central Falls, Save the Bay, Waterman Street Dog Park Association, Lincoln Conservation Commission, Edgewood Waterfront Preservation Association, City of East Providence, Woonasquatucket River Watershed Council, Town of Smithfield, Rhode Island Clean Water Association, Partnership for Providence Parks, Blackstone River Watershed Council, Friends of the Moshassuck, and The Empowerment Factory.



*Edgewood Waterfront Preservation Association Clean-up 2024.*

## March Employee Appreciation Recap

NBC celebrated March holidays, St. Patrick's Day and St. Joseph's Day with some employee appreciation fun. Staff gathered at both Field's Point and Bucklin Point on Thursday, March 20th to celebrate with zeppole's, cupcakes, trivia and games.

Congratulations to NBC's trivia and survey says winners **Andre Dixon, Robin Valenti, Janet Luu and Krystine De Leon Severino** and thank you everyone for coming!



## Need Help Upgrading or Obtaining your Wastewater Operators License? Tyler Can help!

Environmental Monitoring Staff are always ready to use their expertise to assist other Sections of the NBC above and beyond EM's normal re-



sponsibilities of satisfying permit sampling requirements of the treatment plants, industry, rivers, and the upper Narragansett Bay. Most recently, **Tyler Bissonette**, who has both his Massachusetts's and Rhode Island's Grade IV Operator's Licenses, offered his assistance and is helping NBC Staff looking to obtain and/or upgrade their License.

Tyler is ready willing and able to help anyone who needs it and is a great resource for tutoring if anyone needs assistance passing the operations licensing exam. All you need to do is reach out! [tbissonette@narrabay.com](mailto:tbissonette@narrabay.com)

### Blood Drive Results

#### Narragansett Bay Commission

 <b>8</b> donations	 <b>24</b> potential lives saved
---	--

**Thank you, Lifesavers.**

**Next Blood Drive:**  
Monday, June 16<sup>th</sup>  
9:00am – 12:00pm

[Click Here to Make an Appointment](#)

800.283.8385 • ribc.org



## Donations Needed: Spare a Pair Underwear and Sock Drive

The NBC will be participating in the Buy Nothing Day Coat Exchange Spare a Pair sock and underwear drive now through April 25th. In addition to the sock and underwear drive, they will be supporting RED.Lined again this year by collecting menstrual products. Products should be individually wrapped but can be purchased in bulk. Products needed include tampons, panty liners, pads, menstrual cups and cosmetic bags and pouches.

### *Why these items?*

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

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



Donation bins will be set up at the COB, FP, BP and the LAB for any staff who would like to donate items. **Donated items will be collected on Friday, April 25th at all NBC locations.**

## Grease Consolidation at Field's Point

In the waste oil storage area at Field's Point there were seventeen 55 gallon grease drums that had small amounts of leftover grease in each of them. The grease is the left-over residue from gear oil that FP used in the past.

O & M Coordinator Tiziano Roncone ordered a heating pad and FP Mechanic Norman Rodolowicz brought the 55 gallon drums to the maintenance shop with the forklift. They were then able to heat the grease drums to melt the grease over a 5 gallon bucket, creating seventeen drums grease free and consolidated into two drums.

Tiziano is working on trying to get a vendor to pick up our empty drums and a grease truck to get rid of the grease in the two consolidated drums.

Great work Tiziano and Norman!



— Submitted by Sean O'Keefe

## NBC Hosts its 4th Annual Career Day with Central Falls High School

Students and teachers from Central Falls High School visited the Field's Point Wastewater Treatment Facility and the Water Quality Science Building on March 20th and 21st. Students toured both facilities introducing them to various career paths within operating a WWTF and participated in some water testing at Collier Park in Providence.

NBC's Process Monitor **Jaiden Alvarado**, a Central Falls High School alum and a recruit from our first Career day event gave the WWTF tours along with Senior Process Monitor **Sean O'keefe**.

Students and teachers were very impressed and students showed interest in many of the career fields discussed. THANK YOU to all the NBC staff who volunteered to participate, assist with planning, and showed off your career here at NBC. You were all great ambassadors for the NBC!



Sean O'Keefe with students at the aeration tanks.



# NBC Pipeline

May 2025

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

## Calendar of Events *for May*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
<p>MAY IS <b>MENTAL HEALTH AWARENESS MONTH</b></p>						
4	5	6	7	8	9	10
	<p>Cinco De Mayo</p>				National Receptionists Day	
					Payday	
	12	13	14	15	16	17
<p>HAPPY Mother's Day</p>	Full Moon			Watershed Explorers Conf. at Governor Notte Park		
18	19	20	21	22	23	24
		<p>World Bee Day</p>				
					Payday	
25	26	27	28	29	30	
	<p>Memorial Day</p>	BOC Meeting 11 AM BP				

# News Briefs...

Welcome...

Meet Nathan King!



Nathan starts with NBC in May as an IM Operator II. Nathan is from Kansas City, Missouri. He enjoys working out, going for a run and spending time with his daughter. Nathan loves any ice cream that has peanut butter and chocolate in it. Fun Fact: he was a former professional mascot.

Meet Casey Scanlon!



Casey started in April as NBC's newest Customer Care Representative.

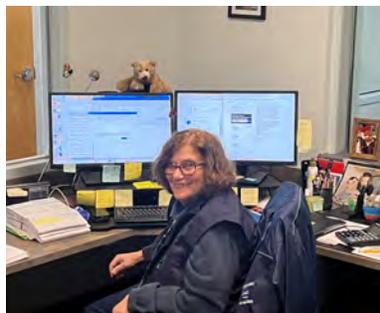
Meet Kevin McDonald!



Kevin starts in May as NBC's new CFO. Kevin is originally from Long Island, NY. Kevin and his husband are expecting their first child in September 2025. He enjoys knitting, cooking, skiing and gardening

in his free time. Fun Fact: Kevin studied the Chinese language in China during the summer of 2006.

Specials  
Thanks to Our  
Wonderful  
Receptionist,  
Elaine Del-  
Rossi, Thank  
You for All  
you Do!



National Receptionists Day is Friday, May 9th.

Congratulations...

To Operations Supervisor **Robert Capron** and family on their newest addition!

**Tatum David Capron**  
**Born April 10th**  
**6lbs. 15oz. and 20 inches.**



Mom and baby are doing well and big sister, Jaelyn is so excited for her new role as big sister.

.....  
To NBC Commissioner, **Michelle DeRoche** on receiving the Providence Business News C-Suite Award.



*From left to right: Commissioner Mario Carlino, Laurie Horridge, Karen Musumeci, Jim McCaughey, Commissioner Michelle DeRoche, Commissioner Richard DeFino, Chairman Vin Mesoella, Commissioner Michele Brais & Madlin Severino.*

The C-Suite Award recognizes top C-level executives for public, private and nonprofit companies who are innovators, trailblazers, role models and leaders in the community. Michelle is the Chief Operating Officer at

University Orthopedics. NBC staff and Commissioners joined Michelle at the awards ceremony on April 16th to celebrate.



## RICWA Announces Awards for 2024



The Rhode Island Clean Water Association has announced their awards for 2024. NBC is happy to announce three prestigious awards were received within the organization.

**Field's Point** received the Gold Award which recognizes a treatment facility with no violations for the calendar year. **Bucklin Point** received the Silver Award which recognizes a treatment facility with only one violation during the calendar year. IM Manager **Tony DiIorio** received the Bill Wilber Collections System Award which recognizes an individual for outstanding contributions in advancing collection systems knowledge.

Awards will be given during the annual awards banquet held on Friday May 9th at the Cranston Country Club.

Congratulations FP, BP & Tony DiIorio!

## Wellness Incentive Credits

If you have not already taken advantage of the \$500 offered to you through NBC's wellness incentives, click the link below for a list of programs that you may still have time to complete. All wellness appointments must be complete by June 30, 2025.



Click Here: [Wellness Incentive Credits](#)

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

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

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## NBC Honors Eighteen Companies in Perfect Compliance

On Wednesday, April 9th the NBC honored eighteen companies in the NBC service area for perfect compliance with special guest speaker RI Secretary of State Gregg Amore, marking NBC's 30th year issuing Environmental Merit Awards. NBC recognizes those companies among its 1500 permitted users who have achieved perfect regulatory compliance and outstanding pollution prevention in the previous year.

The companies in perfect compliance include: Armbrust International, Ltd., Hindley Manufacturing Company, HP Services, Inc., John H. Collins & Sons Company, Manchester Street, LLC, Materion Technical Materials, Inc., Metallurgical Solutions, Inc., Narragansett Jewelry Co., Inc. dba C & J Jewelry Co., Providence Metallizing Company, Inc., Rhode Island Heat Treating & Black Oxide Company, Rhode Island Resource Recovery Corporation, Stackbin Corporation, Tanury Industries PVD, Inc., Technodic, Inc., Tedor Pharma, Inc., The Okonite Company, Truex, Inc. and Univar Solutions USA, Inc.

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



*From left to right: RI Secretary of State Gregg Amore, Peter Connell from RIRRC and Chairman Vin Mesoletta.*



To Jason Trenholm, Sean O’Keefe, Liam Walsh, Kerry Britt, Elizabeth Kohr, Aaron Amaral, Peter Gnocchi, Tyler Bissonnette, Michael Golenia, Nora Lough, and Kim Sandbach for another successful Open House during RI’s Clean Water Week.

NBC had 55 visitors during the event even with the dreary weather that day. Visitors left impressed and thankful for all of NBC’s hard work and dedication to clean water and without all of our staff that wouldn’t be possible. Thank you for being exceptional clean water heroes!



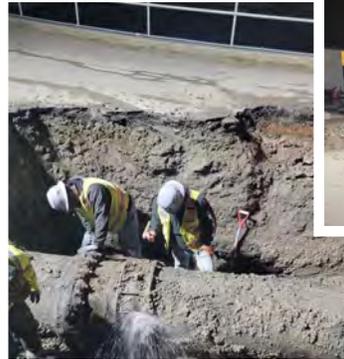
.....  
A HUGE thank you to all involved on the Returned Activated Sludge (RAS) leak situation on Monday, April 28th.

It was all hands on deck during the early morning hours. At about 12:15 AM a leak was reported by Supervisor Gene Medieros at Bucklin Point between the final clarifiers and the bisulfite building. After some investigation, staff discovered the leak was coming from the RAS line so the RAS pumps were immediately shut off which helped slow the leak. Marc Pariseault, Nigel Yattaw and Kerry Britt were called in to take over the situation and Tony DiIorio was able to get NBC’s IM operators in to assist with the clean-up and bring in the vacor truck. Operations made sure to cover the drain to the outfall pipe and DEM was notified of the spill and luckily there was no pollutant discharge.



While NBC staff assisted with containing the situation and the clean-up, Greg Waugh reached out to Barletta and they responded immediately to the site and by 6:30 AM BP was back in operation. They were able to patch the leak but future repair will be needed for the RAS line. This will need to be done during low flows later in the summer, weather permitting.

This was not the most ideal way to start off a Monday. The staff involved showed excellent teamwork and communication skills and worked tirelessly to get this repaired as quickly as possible to avoid any violations.



## NBC Receives GFOA Excellence Award

NBC received the GFOA Excellence Award in financial reporting for FY 2024. This award is the highest form of recognition in the area of governmental accounting and financial reporting and represents significant accomplishment. It encourages and assists state and local government agencies to go beyond the minimum requirements of generally accepted accounting principles to prepare annual comprehensive financial reports that evidence the spirit of transparency and full disclosure and then to recognize individual governments that succeed in achieving that goal.



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



# NBC Pipeline

June 2025

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## Calendar of Events *for June*

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

### Pack of Coyote Pups Spotted at Bucklin Point

These adorable pups were spotted on the access road to BP. Be on the look out and be careful



*Photo Credit: Kathryn Kelly*



## Environmental Monitoring Welcomes New Buoy for Water Quality Monitoring

NBC's Environmental Monitoring department purchased a new buoy for their fixed site water quality monitoring program. The new buoy will be deployed in the Seekonk River just south of Bucklin Point. This will be the second buoy and the third fixed site that EM will be maintaining for the upcoming season. The other two locations are a dock at Phillipsdale Landing and a buoy deployed at Bullock's Reach. For those unfamiliar with the fixed site network, it is a series of locations that are managed by NBC, URI, RIDEM, and others. Each location provides live water data and shares that data with other members of the network. The goal of adding the new buoy to the network is to eventually replace the Phillipsdale site. Hopefully, the new location will provide our team with more data showing the gradual improvements to the river's water quality. For more information about NBC's Fixed Site Network please check out our blog at: [www.narrabay.com/snapshot-of-the-bay](http://www.narrabay.com/snapshot-of-the-bay).



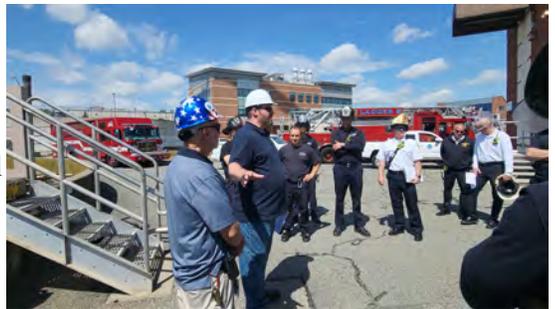
— Submitted by Tyler Bissonnette

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## NBC Hosts Annual Confined Space Emergency Rescue Drill at Field's Point

On May 8th, the NBC and the Providence Fire Department conducted a highly effective 90-minute Confined Space Emergency Rescue Drill, reinforcing their commitment to safety and inter-agency collaboration. The annually required exercise simulated a real-world scenario, allowing both teams to practice critical rescue techniques and improve coordination in high-risk environments. Following the drill, the Providence Fire Department proudly shared a post on social media, highlighting the professionalism and teamwork displayed throughout the session. The department also expressed enthusiasm for future collaboration, formally requesting more frequent training sessions that incorporate a variety of setups and tactical approaches to ensure comprehensive preparedness. This joint effort marks a significant step forward in ensuring the safety of both NBC personnel and the local first responders in confined space emergencies.

A big thanks to NBC's Field's Point Operations team for setting up a safe training environment, and special thanks to Operations Support Supervisor Jack Fascitelli for making a professional, calm phone call to 911.



— Submitted by Kelsie Bryer

## NBC Hosts End-of-year Celebration for Watershed Explorers

The NBC Watershed Explorers gathered at Governor John Notte Park in North Providence on May 15th to celebrate the completion of the year-long award winning program. Throughout the 2024-2025 school year Environmental Education Coordinator Cynthia Morissette worked with 13 schools in the NBC service area totaling over 800 students.



The program encourages students and teachers to become stewards of the environment focusing on their local watershed and other surrounding water bodies. It also helps students understand the connection between



the health of their local watersheds and Narragansett Bay, encouraging students to help keep these precious resources healthy for future generations.

The conference kicked-off with student presentations. A group of students from each school were chosen to present their song, rap or poem from their macroinvertebrate projects. Following presentations students participated in educational activities presented by NBC staff, RI Audubon Society, Save the Bay, Mass Audubon, Norman Bird Sanctuary, Resource Recovery, 15minute Field Trips and Mystic Aquarium.

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



Linda Giorgianni & Pam Ciolfi.

## Shellfishermen Collect 76,200 lbs to Transplant

NBC's Technical Analysis and Compliance team had a very successful shellfish transplant on Thursday, May 1st. Sixty fishermen participated and collected 1,524 (50 lb) bags of shellfish, totaling 76,200 lbs to transplant into designated shellfish management areas.



From left to right: Lydia Clifford, Amanda Kezarian, Walter Palm, Liz Kobr, Natban Dean, Junel Grande, Evan Matz, Dee Bigotti, Mike Golenia, Jeff Tortorella.

# Blood Drive

## We all bleed the same.

**Narragansett Bay Commission**  
**Monday, June 16**  
**9:00am - 12:00pm**

COB Main Conference Room  
 1 Service Road, Providence

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

All presenting donors will be entered to win one of two \$200 gift cards to the Rhode Island Red Food Tours!

**Prepare to donate**

- Eat well and hydrate
- Bring a photo ID
- Feel good and symptom free
- Must be 17+ or 16 with parental consent form
- Meet minimum weight requirements

For full eligibility requirements and COVID-19 information, visit [ribc.org/eligibility](https://ribc.org/eligibility).

# Congratulations!

To Environmental Monitoring Manager **Nathan Dean's son Carson Dean** on setting the state record for Pole Vault. Carson is a senior at Bishop Hendricken and closed out the Hawks' 47th consecutive team title by setting a new state record of 15 feet, 9 inches at the Class A Championships the weekend of May 24th.

On Saturday May 31st he broke his own record and the state record again reaching 16 feet at the Hendricken Invitational. Carson has been unbeaten this spring and this has been a huge goal of his.

On top of setting the state record, The Warwick Beacon featured him as Athlete of the Week.



From left to right: Carson Dean and Coach Deming. Photo from the Warwick Beacon

Congratulations, Carson and the Dean family!

## Executive Director Laurie Horridge Attends NEWEA to Speak on WIFIA

The annual spring meeting was held in May in Portland, Maine. Laurie and NBC staff attended the 3 day event, attending technical sessions and watching the Operations Challenge Training Event.



Laurie spoke at one of the technical sessions on Leveraging WIFIA Financing for Utility Resilience, a critical source of funding for NBC's Capital Projects.

## RICWA Awards Recap

As mentioned last month, The Rhode Island Clean Water Association (RICWA) announced their awards for 2024 and awards were presented at their annual awards banquet on Friday, May 9th. Pictured below are photos from the special event.



FP: Gold Award

BP: Silver Award

Tony DiIorio: Bill Wilber Collections System Award

Kathryn Kelly: Alfred E. Peloquin Award (received from NEWEA in January)



Congratulations again to all!

Photo Credit: Mike Spring



# NBC Pipeline

July 2025

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## Calendar of Events *for July*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2	3		5
				Payday		NBC Group Outing: RI FC vs. Birmingham Legion FC @ 7 PM
6	7	8	9	10	11	12
				Full moon		
13	14	15	16	17	18	19
		Ice Cream Social COB, FP, IM, WQSB, PT 2 PM - 4 PM			Payday	National Ice Cream Day
20	21	22	23	24	25	26
				Ice Cream Social BP 12 PM - 1 PM		
27	28	29	30	31		



# News Briefs...

Welcome...

Meet Armande Aywas!



Armande is NBC's new O & M Technician at Field's Point. She is from Pawtucket, RI and has 3 children and 2 grandchildren. She loves to swim or take a nap after a long day. Her favorite ice cream flavor is mint chip and she enjoys listening to local bands and working in the garden in her free time. One of her bucket list items is to hopefully one day visit the Grand Canyon and go white water rafting.

Armande is NBC's new O & M Technician at Field's Point. She is from Pawtucket, RI and has 3 children and 2 grandchildren. She loves to swim or take a nap after a long day. Her favorite ice cream flavor is mint chip and she enjoys listening to local bands and working in the garden in her free time. One of her bucket list items is to hopefully one day visit the Grand Canyon and go white water rafting.

## NBC Receives PBN Best Places to Work Award for the Fifteenth Consecutive Year

The NBC was selected as one of the Best Places to Work in RI for 2025 by Providence Business News for the fifteenth consecutive year!

The PBN has been running this program for twenty years. Companies are chosen based on HR policies and confidential employee surveys. Sixty-four companies were honored at the Crowne Plaza in Warwick on June 12th. NBC was one of fifteen companies chosen in the large company (150-499 employees) category.

Thank you to all the NBC staff for completing surveys and making this award possible!



Left to right, top to bottom: David Aucoin, Chris Dracoules, Cheryl Pescarino, Aimee Bilodeau, Michelle Grossi, Anne Marie Higgins, Nikolas Carroccio, CJ Spellman, Kelsie Bryer, Joe Moniz



## Congratulations...

Love is in the air in the NBC TAC department!

On June 12th, TAC Manager **Eliza Moore** eloped with her partner David on the 15th anniversary of their first date. Later that weekend, TAC summer intern **Evan Thompson** proposed to his girlfriend in beautiful Baxter State Park in Maine, and she said YES!



David & Eliza. Photo credit: Janet Moscarello.

Congratulations to all!

## Thank you from the RIBC

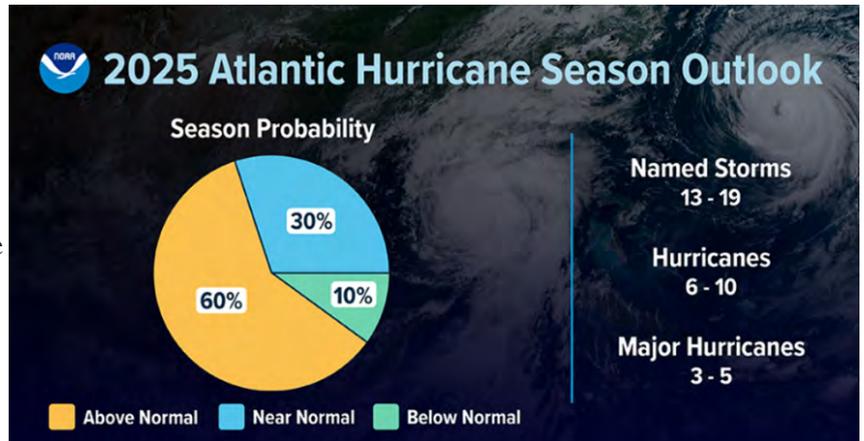
To all those who participated in June's NBC Blood Drive! NBC had 8 donations which will help save up to 24 lives!



NBC's next blood drive: TBD - stay tuned.

# 2025 Hurricane Season Forecast

The National Oceanic and Atmospheric Administration (NOAA) has released its forecast for the 2025 Atlantic Hurricane Season, which runs from June 1st through November 30th each year. Forecasters predict an above-normal hurricane season with an estimated total of 13-19 named storms, 3-5 of which are predicated to develop into major hurricanes (Category 3, 4 or 5.) Although this season is not expected to be as severe as the record-breaking series of storms that slammed the U.S. in 2020, NBC employees and their families are still encouraged to begin planning now for potential storm impacts. Click [HERE](#) for a list of helpful hurricane preparedness resources.



## Hurricane Categories Defined:

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

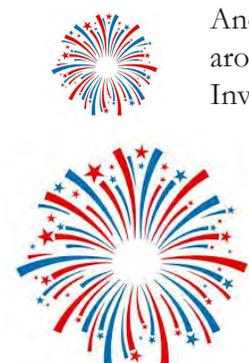
## Key Terms to Remember:

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

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

— Submitted by Dave Aucoin

## NBC Wildlife Spotlight



Another Turtle alert at BP. This big guy aka Bucky was wandering around the the road near the bisulfite building. Our turtle whisperer, Inventory Control Clerk Guy Beaudette quickly went into action and rescued him. This 20 pounder would have not made it too much longer with all the construction vehicles moving around the area. Bucky has been safely released back to his pond!

Great job!

— Submitted by Marc Pariseault



## NBC Hosts Poster Contest Gallery Night for the 2025 Poster Contest Winners

On Wednesday, June 4th, NBC awarded fourteen talented young artists at NBC's 32nd annual Poster Contest Awards Ceremony. This year's poster theme was, *The Best Day I Had With Water*. Students were asked to artistically showcase a day they remember having a great time with water.



NBC staff voted for each grade back in May, resulting in NBC's fourteen winners, seven first place and seven honorable mentions for grades K-6. Students were invited with their families to receive their awards, view their beautiful artwork and of course, CELEBRATE.

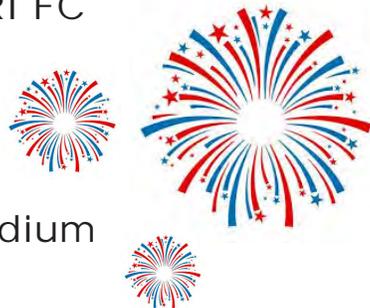
The artwork selected will be featured in NBC's annual Poster Contest Calendar coming out in December, stay tuned.

## Spotted!

NBC's Director of Environmental Science and Compliance **Walter Palm** was spotted in Hey Rhody Providence's July issue. Walter is currently on the path to receiving his Doctorate in Business Administration with URI and was featured in their ad for their degree programs.

An advertisement for The University of Rhode Island College of Business. It features a photo of three people (two men and one woman) in business attire. The text reads: "Your Success Is Our Business", "MBA, PROFESSIONAL MASTER'S &amp; DOCTORATE PROGRAMS", "In-person in Kingston and Providence Daytime and Evening Classes Hybrid and Fully-Online Programs", "EDBAC AACSB ACCREDITED", and "Apply today URI.EDU/BUSINESS".

## NBC Outing: RI FC vs. Birmingham Legion FC at the New Centreville Bank Stadium



The RI FC soccer club at Centreville Bank Stadium in Pawtucket will be offering group rates for NBC employees.

NBC's first group offer is for Saturday, July 5th at 7PM vs. Birmingham Legion FC, including a Fireworks show in honor of Independence Day.

Tickets are \$24 each for seating in the north endline, section 131.

Use this link to purchase tickets:

<https://rffc.spinzo.com/?group=the-narragansett-bay-commission-2729>

For questions, contact Talia Cheshier x394.



## Lets play a game of: What is This?



Can you identify this? It's a picture of something you can find at NBC.

Send over your answer to [tcheshier@narrabay.com](mailto:tcheshier@narrabay.com), first person to get it right will receive a prize.

Good luck!

Last month's answer: The layer of sludge that develops on the surface in the FP Aeration Tanks.  
Winner: Bob Baglini

# RIasing Sludge Takes Home First Place in the Wastewater Olympics

The New England Water Environment Association (NEWEA) held their Spring Conference on May 11th-14th in Portland, Maine. One of the key highlights during the conference is the Operations Challenge competition. The Operations Challenge, dubbed the “Wastewater Olympics”, consists of five events: Process, Laboratory, Safety, Maintenance, and Collections. Five New England teams competed for the coveted first place trophy with the top three teams advancing to the national competition at WEFTEC in October. Rhode Island’s RIasing Sludge team, pictured below, consists of Coach Dave Bruno (Quonset), Courtney Iava-Savage (East Providence), Kevin Gardner (RCAP), **Shaun Collum** (Narragansett Bay Commission), and Eric Lemoi (Wright-Pierce). They placed first in Process, third in Laboratory, second in Safety, first in Maintenance, third in Collections and took home the Overall First Place trophy.



*From left to right: Dave Bruno, Courtney Iava-Savage, Kevin Gardner, Shaun Collum & Eric Lemoi.*

NEWEA Operations Challenge Chair Nora Lough (Narragansett Bay Commission) did an amazing job coordinating and overseeing the whole competition at the conference. The competition was a major success thanks to her time and dedication.

NEWEA Lab Event Coordinator Kim Sandbach (Narragansett Bay Commission) helped the teams navigate through a new lab event at the competition. This is all possible with the support of the Narragansett Bay Commission and Executive Director Laurie Horridge.



*From left to right: Kim Sandbach, Laurie Horridge, Nora Lough*

*— Submitted by Kim Sandbach*

## Upcoming Local Fireworks

- Providence:** 7/2, 9 PM - India Point Park
- Attleboro:** 7/3, 9 PM - Hayward Field
- Bristol:** 7/3, 9:30 PM - Downtown Bristol
- Cumberland:** 7/3, 9 PM - Tucker Field
- East Providence:** 7/3, 9:30 PM - Pierce Memorial Field
- Narragansett:** 7/3, 9 PM - Narragansett Town Beach
- North Providence:** 7/3, 9 PM - Governor Nott Park
- Warwick:** 7/3, 9PM - Oakland Beach
- Woonsocket:** 7/3, 9 PM - WWII Veterans Memorial
- Newport:** 7/4, 9:15 PM - Newport Harbor
- South Kingstown:** 7/4, 9 PM - Old Mountain Field
- Pawtucket:** 7/5, 7:30 PM - Centreville Bank Stadium



Join us!

# NBC ICE CREAM Social

Ice cream sundae bar with loads of toppings!

**Tuesday, July 15th, 2 PM - 4 PM**  
COB, FP, IM, PT & WQSB  
FP Lunchroom

**Thursday, July 24th**  
BP 12 PM - 1 PM  
BP Lunchroom



# NBC Pipeline

August 2025

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

## Calendar of Events *for August*

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

# News Briefs...

Welcome...

## Meet Olivia Cimerol!



You may recognize Olivia, she was an NBC intern in the past. Olivia is the new Quality Assurance Coordinator in the WQSB. She is from Smithfield, RI where she lives with her 3 dogs and

2 cats. Olivia was a cheerleader for 10 years and now coaches in her spare time. Something on her bucket list is to one day go sky diving. She hopes to check that off her list this summer, stay tuned!

## Meet Matthew See!



Matthew started in July as a BP Mechanic I. Matt is from Pawtucket, RI. He loves chocolate ice cream and watching TV after a long day. No children or pets for Matt but family is very im-

portant to him.

## Meet Daniel Strong!



Dan became a FP Mechanic I in July. He is from North Providence where he lives with his wife and their dog Moses. He enjoys anything outdoors, especially fishing and hunting. The most ad-

venturous thing he's ever done is have dinner at his mother-in-laws.

## Meet Samantha Nasson!



Sam starts in August as an Environmental Engineer. She is from Wrentham, MA, home of the largest outdoor outlet in New England. She

has two dogs, a three-legged golden retriever named Naya and Dua, whom she rescued off the streets of Albania. Sam believes in doing everything now while you have the chance, She moved to Vienna, Austria for a year to complete her master's degree.

## Meet Mark Simms!



Mark is NBC's new Sustainability Technical Coordinator. He is from Towson, MD. His favorite ice cream flavor is strawberry and he enjoys reading and bike riding in his free time. One of

his bucket list items is to hopefully walk Hadrian's Wall one day.

---

## Congratulations...

To General Counsel Assistant, **Lindsey Hazard** on receiving the RICWA academic scholarship. Lindsey is pursuing her Bachelor's Degree in social work, graduating in May 2026. She is currently studying for the LSAT's and plans on starting law school the following Fall.



Congratulations, Lindsey!

---

## Mark Your Calendars

NBC's next blood drive with the RIBC will be on **Thursday, August 28th** from 9 AM - 12 PM in the COB Main Conference Room.



[Click here to make an appointment.](#)

## July was Sweet, The WQSB Celebrates PI(e) in July and NBC Hosts Annual Ice Cream Social

The Environmental Science & Compliance division hosted their 3rd annual PI(e) Day Celebration! It was celebrated on PI Approximation Day – July 22nd, because  $22/7 = 3.14$ . Many participated and brought a variety delicious pies, both sweet and savory.

Thank you to all who joined us for this fun team-building event!



*Walter's famous Strawberry Rhubarb Pie*

On Tuesday, July 15th and Thursday, July 24th NBC hosted its 2nd annual Ice Cream Social at Field's Point and Bucklin Point. This year we created an ice cream bar with six flavors to choose from and over fifteen different kinds of toppings. It's safe to say everyone got their summer ice cream fix this past month!



## Bond Buyer Features NBC, Celebrates the Closing of \$100 million Bond with RIIB

On July 22nd, Bond Buyer featured NBC's closing on the latest \$100 million financing bond with the Rhode Island Infrastructure Bank (RIIB). Bond Buyer is a subscription service that provides important information and resources to the municipal finance community.

NBC and RIIB closed on a \$100 million financing bond at the end of June for NBC's combined sewer overflow (CSO) project. RIIB has been a part of the financing process for the CSO project for over 30 years, totaling financing close to a billion dollars to help complete these projects while saving money with lower interest rates.



## Show Off Your Gardens!

There are some very devoted gardeners throughout the NBC and we'd love to share your work. Send over your pictures to [tcheshier@narrabay.com](mailto:tcheshier@narrabay.com) to be featured in NBC's garden showcase in September.



*Photo credit: Old World Garden Farms*

# EPA Administrator Lee Zeldin Visits Bucklin Point

NBC welcomed special guest, EPA Administrator Lee Zeldin for a visit on July 31st. Zeldin was making his way through the New England states, making a stop at Bucklin Point in East Providence to check out the wastewater treatment facility and the biggest project you'll never see, the CSO Phase III tunnel.

The new, beautifully constructed meeting room at the BP Administration Building gives an almost panoramic view of the facility, a perfect spot to walk Zeldin through the amazing work NBC does on a daily basis. Not only can you see the entire facility but you can view the river where the effluent is discharged. Zeldin and his team were in awe of the facility.



Ed Demerest from Stantec as well as some of the NBC staff escorted Zeldin down the main drop shaft at the CSO Construction site to view the tunnel progress. To the left Zeldin and his staff can be seen in the cage being lowered down into the drop shaft. Pictured to the right is Construction Manager Greg Waugh and Zeldin at the site.

Thank you to all the NBC staff involved in this day and making sure everything went off without a hitch!



## Spotted!

IM Inspector **Megan Rodrigue** was spotted in the Providence Journal last month. Megan along with DEM Marine Biologist Katie Rodrigue, were featured surveying horseshoe crab numbers under the full moon at Conanicut Point in Warwick. Unfortunately, the horseshoe crab population is declining due to habitat loss, its use for biomedical purposes and for bait. Katie visits the site about six times a month during spawning season to record data and tag any new crabs found with a tracking tag.



*Photo Credit: The Providence Journal. From left to right: Katie and Megan.*

## Lets play a game of: What is This?



Can you identify this? It's a picture of something you can find at NBC. Send over your answer to [tcheshier@narrabay.com](mailto:tcheshier@narrabay.com), first person to get it right will receive a prize.

Good luck!

**Last month's answer: BOD bottle tops from the Lab.**

**Winner: CJ Spellman**



# NBC Pipeline

September 2025

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## Calendar of Events *for September*

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

Congratulations to last month's winner **Nicole Skyleson** on the game: *"What is this?"*

Answer: Tiled NBC logo in the entry way of the FP Admin Building



# News Briefs...

Welcome...

## Meet Kiley Marandola!



You have probably seen Kiley around throughout the last few years at NBC working for IM during her college breaks. Kiley is now here full time as an IM Clerk. She is from Johnston and recently graduated from Millersville Uni-

versity with a B.S. in Sports Administration. She has two kittens named Jim and Spaz and enjoys running and playing soccer in her free time.

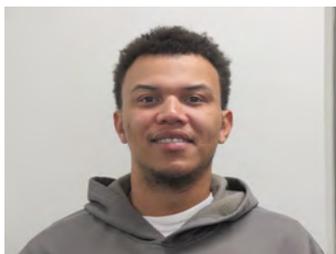
## Meet Nicole Flecchia!



Nicole will start as NBC's Environmental Scientist II in September. Nicole is from Burlington, MA. Her favorite ice cream flavor is cookies and cream and her favorite way to de-stress is to make a cup of tea and read a book. She

hopes to one day visit every US national park and at least one national park on every continent.

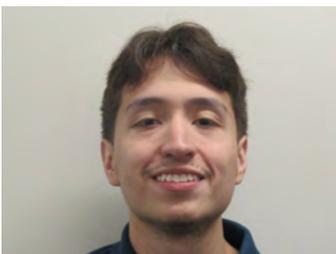
## Meet Jeremiah DeSousa!



Nickname Jay. Jay will start as a Mechanic I at Field's Point. He is from Pawtucket, RI where he lives with his dog named Kobe. He enjoys reading and researching topics in his free time. One of his bucket list items is to one day travel to

Japan.

## Meet Felipe Pareja!



Felipe will be an Operator I at Field's Point. He is from Pawtucket, RI. One of his bucket list items is to one day travel to Machu Pichu.

## Annual NBC Golf Tournament

The annual NBC Golf Tournament is scheduled for...

**Thursday,  
October 2, 2025  
Swansea Country  
Club.**

**Start time: 10:00 AM**



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

This year's event will include lunch; two hot dogs, chips, and soda. The cost will be \$75.00 per person and \$300 for a foursome.

Payment and team roster must be submitted to **Eric Bogosian** by Friday, September 26th. If payment is not received on time, your team will not be scheduled to play, as we are responsible for no-shows. Please check with your supervisor on scheduling vacation or personal time for this.

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

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## Thank You from the RIBC

The August blood drive had 4 donations helping to save up to 12 lives!



**Next Blood Drive: Monday, November 10, 2025, 9:00am – 12:00pm**

## Progress Update on Bucklin Point

The Bucklin Point Final Clarifier and UV Building project continues. In the foreground the two new circular clarifiers are approximately 50% complete as of the end of July. To the right of these tanks is the new UV Building which will house state-of-the-art disinfection equipment. Masonry work has just finished, and the equipment installation has begun. The project is currently scheduled to be complete in July of 2026.



— Submitted by Greg Waugh

## Fall Tuition Reimbursement

Applications for tuition reimbursement for Local 1033, Council 94 and Non-Union Employees must be submitted to Karen Musumeci by Monday, September 22, 2025. Each application must be accompanied by a short course description taken from the college catalog along with documentation of the cost.

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

If you have any questions about the program, you may contact **Karen Musumeci**, at x322.



## EM to the Rescue

On August 20th while performing bay nutrient sampling the Environmental Monitoring team was driving inland towards Collier Point Park when they spotted two boaters waving their hands up in the air while holding flashlights. The EM team made their way over to the boaters in distress who were both relieved and happy to see them. The two gentlemen explained that the cables on their boat fried out and they were stuck and asked for a tow. The EM team connected a line they threw onto one of their back cleats and slowly and successfully towed them to Bold Point Park. They were so grateful and thanked the team several times before parting ways. The boat team consisted of Jeff O'Keefe, Daryll Sirleaf, Fern Johnson and intern Tim Sharpe.

Great job!

— Submitted by Nathan Dean



## Third Annual Watershed Explorers Camp in the Books

Cynthia Morissette, Environmental Education Coordinator, hosted her third annual Watershed Explorers Summer Camp in August.



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

Students spent the week learning about NBC's wastewater treatment process and visiting NBC's state-of-the-art Water Quality Science Building to meet with Biologist Nora Lough to learn about how she uses the sea urchins for water quality research at NBC (pictured below). They worked on many hands on activities, creating elephant toothpaste, slime, rock painting, sea urchin paintings, decorating their hard hats, creating lanterns while learning about Bioluminescence and so much more. Campers also enjoyed a field trip to Save the Bay for a Bay Experience, and a trip to Frosty Hollow Pond in Exeter to search for critters.



*Elephant Toothpaste Activity*



*Garden Showcase*



Jae Pezzullo



Kathryn Kelly



Eliza Moore



Kevin McDonald



Talia Cheshier

NBC would like to put together a community garden starting next spring of 2026.

NBC is in the beginning stages of brainstorming and putting thoughts and ideas together on how we could make this work. If you have any interest in being a volunteer and being a part of the NBC Garden Club shoot **Talia Cheshier** an email at **tcheshier@narrabay.com**.



# September is National Preparedness Month

The Federal Emergency Management Agency (FEMA) annually designates the month of September as National Preparedness Month. With public outreach support from the National Safety Council (NSC) and Ready.gov, this annual observance is held to raise awareness about the importance of preparing for disasters and emergencies that could happen at any time. The theme for 2025 is *“Preparedness Starts at Home.”* Click the link below to view a list of planning tools that NBC employees and their families can explore and implement.

Make A Plan | Ready.gov

NBC employees are encouraged to always take an “All Hazards” approach to emergency planning. The following precautions apply to virtually all emergency situations:

- Download a reputable mass-notification software, such as CodeRed
- Download the FEMA app for resources, weather alerts and safety tips
- Develop and review a family communication plan
- Keep and maintain a hard copy of family and utility phone numbers
- Have an emergency kit in your vehicle and at least three days of food and water at home
- Know how to safely shut off utilities
- Store all important documents, such as birth certificates and insurance policies in a fire- proof safe or a safety deposit box
- Ensure that at least one family member is trained in first aid and CPR
- All NBC employees should also take the time to review the Emergency Action Plan applicable to their work area, as posted on SharePoint.

**PREPARING MAKES SENSE**  
How well you and your family prepare for a disaster before it happens impacts how quickly you recover.

- KNOW YOUR RISK**  
Prepare for the risks where you live.  
Visit [FEMA.gov](https://www.fema.gov) where you can input your location to get information about disasters in your area.  
Visit [Ready.gov](https://www.ready.gov) to know how to prepare for disasters and what to do during an emergency.  
Download the [FEMA mobile App](https://www.fema.gov) to receive real-time weather and emergency alerts, locate shelters, send notifications to loved ones and more.
- MAKE A PLAN**  
Prepare yourself and your family before disaster strikes.  
Consider the **specific needs of your household** like medical needs or items for your pets.  
**Practice your family's plan.**  
Visit [Ready.gov](https://www.ready.gov) and use our template to create a Family Emergency Plan you can email to yourself.
- TAKE ACTION**  
Be ready to respond to and recover from a disaster.  
Gather supplies that fit your family's needs.  
**Secure important documents.**  
Understand your **insurance coverage.**  
**Participate in community disaster preparedness events.**

Ready. [Go to Ready.gov for more information to help you be prepared!](https://www.ready.gov)

**Everyone Has a Role**  
As you prepare, adjust your plans and emergency supply kits to your own daily living needs and concerns.

Your basic kit should include enough items to last for several days:

- Water
- Non-perishable food
- Cash
- Battery-powered or hand crank radio
- Flashlight and extra batteries
- Non-electric can opener
- First aid kit
- Whistle
- Prescription medications
- Personal hygiene items
- Dust mask to help filter contaminated air
- Moist wipes, garbage bags and plastic ties
- Wrench or pliers to turn off utilities

**LEARN MORE AND GET INVOLVED**

- Learn how to take action in emergency situations and provide lifesaving care before professional assistance arrives through **You Are the Help Until Help Arrives.**
- Visit [FEMA.gov/cert](https://www.fema.gov/cert) to find a Community Emergency Response Team program, and train to help your community respond and prepare for disasters.
- Take a CPR and first aid class offered by a local community organization, so that you know what to do if a family member, neighbor, or coworker is hurt.

Ready. [Go to Ready.gov for more information to help you be prepared!](https://www.ready.gov)

## Safety Corner

The following safety trainings are scheduled for September:

- CPR/AED & First Aid Training @ Field's Point WWTF 9/9
- Confined Space Field Training @ Tunnel Pump Station Property 9/17
- Confined Space Field Training @ Bucklin Point WWTF 9/18
- Confined Space Field Training @ Field's Point WWTF 9/30

— Submitted by Kelsie Bryer



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October 2025

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## Calendar of Events *for October*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1  National Pumpkin Spice Day	2 Flu Shot Clinic 6:30 - 11:30 AM NBC Golf Tournament	3	4
5	6 Full moon	7	8	9	10 Payday	11
12	13  Columbus Day Observed	14	15	16	17	18
19	20  SPIRIT WEEK OCT. 20th - 24th	21	22	23 Pumpkin Decorating Contest 1 PM - 3 PM	24 Payday	25
26	27	28	29	30	31 	



# News Briefs...

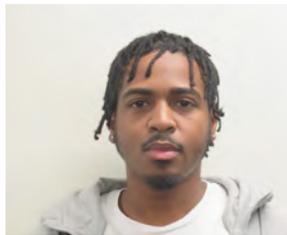
Welcome...

Meet Mario Martinez!



Mario is NBC's newest Mechanic at Field's Point. He resides in Providence with his black lab Pakko. His favorite ice cream is blueberry cheesecake and he enjoys going fishing after a long day.

Meet Michael Ducally!



Mike started in September as an Operator I at Field's Point. He is from Providence and enjoys fishing in his free time. The most adventurous thing he has ever done is complete a 5-mile hike in Hawaii.

Meet James Dixon!



James started in September as a Field's Point Operator I.

## Congratulations to NBC's 2025 Cornhole Champs!

To the 2025 NBC Cornhole Champs, **Jen Harrington** and **Bryan Blackmore!**

NBC had 32 teams compete with Jen and Bryan taking the win in the final round against Melissa Boccanfuso and Eric Bogosian.

Thank you to HR staff, Cas Bennett and Jess Toporoski for organizing this fun event and thank you to all those who participated, everyone played a great game!



— Continued on page 3



NBC's annual Pumpkin Decorating Contest will be on Thursday, October 23rd in the Field's Point Education Center. This year's theme is "Welcome to the Carnival".



Set up: 12:30 PM

Voting: 1-3 PM for pumpkins and costumes.

Apple cider donuts and apple cider will be available, be sure to grab one!





*The final round: Eric Bogosian and Melissa Boccanfuso vs. Jen Harrington and Bryan Blackmore.*

## Casual Fund Update

The NBC Casual Day Fund will be contributing to the Gloria Gemma Breast Cancer Research Foundation and the Juvenile Diabetes Research Foundation for October.



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



## Congratulations...

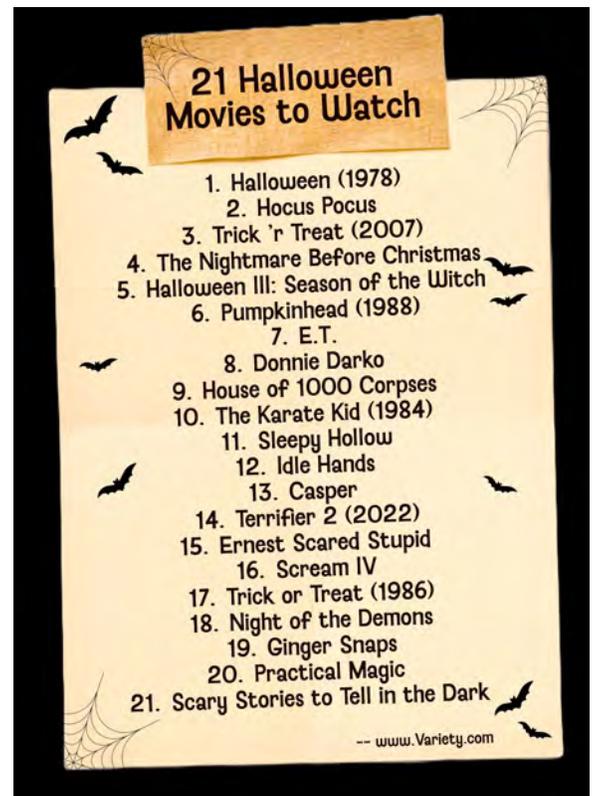
To Controller **Leah Foster** on the birth of her first grandchild, Benjamin Steven Foster!

Born on September 25th, weighing 6 lbs 3 oz.



To **CFO Kevin McDonald** and his husband Derek on the birth of their son Callum James.

Callum arrived on September 23rd, weighing 7 lbs 3oz.



- On September 20th at Field's Point a 300 horsepower motor that moves screwlift pump #2 caught fire. These screwlift pumps and the building they are housed in are critical to the treatment process, moving all the waste that comes through the plant from primary to secondary treatment.



Staff responded immediately and tried to help extinguish the 3-foot blaze coming from the motor before the fire department arrived on scene. During this time the process monitor shut down the screw that was on fire and turned on another pump.

Staff did an outstanding job handling this dangerous situation and keeping everyone's safety in mind.

- On September 25th the Providence and surrounding areas received over 3 inches of rain throughout the day. Both plants and staff handled the weather well with no major issues. The pump station was routinely checked throughout the day and the tunnel was pumped down prior to the storm. The tunnel did fill within a couple hours of the heavy rain. Field's Point encountered one minor hiccup, Bar Rack #1 failed to work due to the amount of debris that was coming through the system from the heavy rains. Operations cleaned it out the best they could and IM assisted with vactoring out any remaining debris and they were able to have it back up and running in no time.



*Operator 1 Dylan Barlow Monitoring flows in the wet weather tanks.*

Great team effort from everyone involved in these two events!



Bar Rack #1  
Before



Bar Rack #1  
After

## Rising Sludge Takes the Win at the Rhody Rumble

The Rhode Island Clean Water Association (RICWA) hosted its first Rhody Rumble, their very own regional Operations Challenge Competition during their annual Trade Show in September. Teams battled it out in the five events - operations, maintenance, laboratory, safety, and collection systems to win a first place Rhody Rumble Belt.

RI Team, RIsing Sludge took home the first place belt. (woo hoo!) Perfect for their preparation to head to WEFTEC in October, where they will be competing in the national Operations Challenge Competition. NBC's Operation Supervisor Shaun Collum is a part of the winning team. Congratulations and best of luck at WEFTEC!

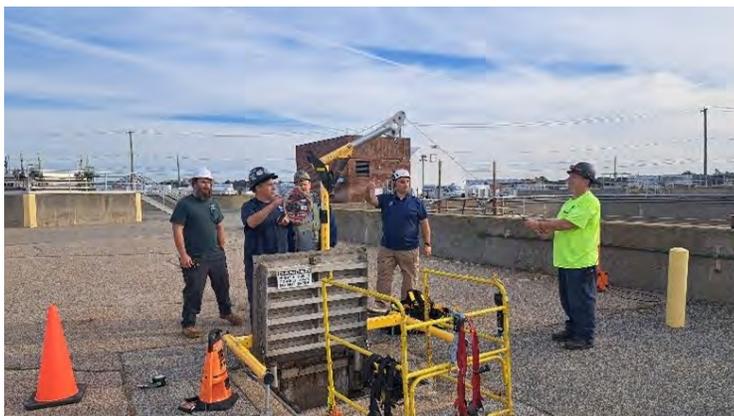


*Shaun Collum last one on the right.*



# NBC Employees Receive Annual Training for Permit-required Confined Space Entry

Every fall, approximately 130 NBC employees receive field training for permit-required confined space entry. This important safety training addresses hazards that may be present in areas such as manholes, underground hatches, and empty treatment tanks. A permit-required confined space has potential hazards including poor atmospheric conditions like oxygen deficiency or the presence of toxic gases, the risk of fire or explosion, chemical and biological agents, temperature extremes, restricted entry and exit, and the danger of engulfment by liquids or solids. Other hazards may include physical risks such as falls, inadequate lighting, electrical equipment, and noise. Employees receive important refresher training on hazard controls that can be used to mitigate or eliminate these types of hazards so entry can be made safely, and important tasks can be completed. A special thanks to Ocean State Safety for conducting this year's training over the course of three days!



— Submitted by Dave Aucoin

## National Fire Prevention Week October 5th – 11th

The National Fire Protection Association (NFPA) annually designates the first week of October as Fire Prevention Week. This public outreach campaign is designed to increase awareness about fire prevention techniques people can utilize in the workplace, as well as at home. This year's theme is "Charge into Fire Safety: Lithium-Ion Batteries in Your Home," and promotes the proper purchasing, charging, and recycling of these common types of batteries. NBC employees are encouraged to view this year's promotional video by clicking [HERE](#).



.....

### The Safety Corner

The following safety trainings are scheduled for October: **October 21st & 22nd – Annual Hearing Conservation Training and Audiograms (applicable employees)**

— Submitted by Dave Aucoin

## P-Bruins Kick-off the Season!

It's that time of year again! The P-Bruins will be working with NBC again to give us special group offers and great lower-level seats on upcoming games throughout the year. Their first group offer will be for Saturday, October 18th vs the Hartford Wolfpack. For anyone that can't make this game, when you access the link, they are also offering discounted tickets for games on October 12th, 24th and 26th.



### Game & Details:

Saturday, October 18th at 7:05 vs. Hartford

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

Tickets can be purchased for this game at:

<http://www.ProvidenceBruins.com/GroupTickets>



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Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5	6	7	8
 Daylight Savings Time Ends		BOC Meeting 11 AM COB			Payday	
9	10	11	12	13	14	15
	Blood Drive 9 AM - 12 PM COB	 Veterans Day Office Closed				
16	17	18	19	20	21	22
					Payday	
23	24	25	26	27	28	29
				 Thanksgiving Day Office Closed		
30						

# News Briefs...

Welcome...

Meet Theard Tomar!



Theard started on October 6th as an Operator I at Bucklin Point. He is from Providence and has four children. Theard can juggle chain saws and he hopes to one day learn how to fire breath!



Meet Michael Harris!

Mike started on October 6th as an Environmental Engineer in IM. He is from Richmond, RI.



Meet Cameron Nadeau!

Cam is NBC's new Senior Accountant. He is from Acushnet, MA. Cam is a huge Boston sports guy and enjoys playing golf and spending time with his family in his free time. The most adventurous thing he has ever done is zip lining and scuba diving in Punta Cana this past summer.



**Deadline for Open Enrollment is Monday, November 10th.** Online enrollment must be completed by all employees even if you are not making changes.

- The first 5 Employees that complete their online enrollment will receive a Massage gun.
- The next 20 Employees will receive a digital jump rope.
- The next 100 Employees will receive an NBC goodie bag.

If you've had changes during the year, make sure you:

*Update Beneficiary Information*

*Update Vehicle Information*

*Update Contacts or Address Information*

**All completed Forms must be sent to HR by November 20th. Changes are effective in the paycheck dated January 12, 2026.**

**Use or Lose by December 27th**



The deadline for utilizing "Use or Lose" vacation and personal time is December 27th, 2025. Please be sure to review your accruals on SharePoint and plan accordingly. Scheduling and approval for the use of all vacation and personal time must be coordinated and approved by your supervisor.

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**Save the Date: Holiday Employee Appreciation Events Announced**

**Thursday, December 11th:** COB, IM, WQSB, & PT  
Location: FP Lunchroom

**Tuesday, December 16th:** Field's Point - All shifts  
Location: FP Lunchroom



**Thursday, December 18th:**  
Bucklin Point - All shifts  
Location: BP Lunchroom

## RIsing Sludge Takes Home Second Place Overall in the Operations Challenge at WEFTEC

The Rhode Island Clean Water Association's (RICWA) Wastewater Operator Challenge Team, **RIsing Sludge** competed in the 38th annual Operations Challenge Competition in Chicago last month. The Ops Challenge at WEFTEC is considered the water sectors most exciting professional development program, gathering top-tier wastewater operations professionals from all over the U.S., as well as Denmark and the United Kingdom.

NBC's Bucklin Point Operations Support Supervisor **Shaun Collum** is a part of the RIing Sludge team. The challenge consists of five events: Process, Laboratory, Safety, Maintenance and Collections. Out of 57 teams that competed across three divisions, RIing Sludge placed 1st in the Process Event, 1st in the Safety Event, and 2nd place overall in the Division II bracket.

Congratulations Shaun and the rest of RIing Sludge team, NBC can't wait to cheer you on in the 2026 competition!



*Shaun Collum centered with award. // Photo credit: Water Environment Federation/ Kieffer Photography*

## Happy Hauntings from Environmental Monitoring!

Did you see the ghost in the WQSB? EM's Quality Assurance Coordinator **Olivia Cimero** was haunting for a spotlight in the Pipeline!



**Rhode Island Blood Center**

# Blood Drive

**Narragansett Bay Commission**

**Monday, November 10**  
**9:00am - 12:00pm**

COB Main Conference Room  
1 Service Road,  
Providence

**Prepare to donate**

- Eat well and hydrate
- Bring a photo ID
- Feel good and symptom free
- Must be 17+ (or with parental consent form)
- Meet minimum weight requirements

For full eligibility requirements and COVID-19 information, visit [rbc.org/eligibility](http://rbc.org/eligibility)

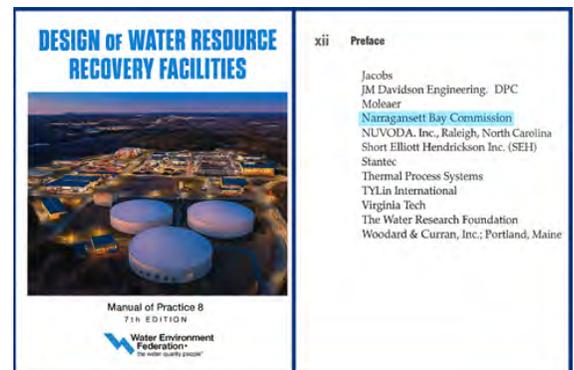
**Sign up** at [rbc.org/drives](http://rbc.org/drives) and use code 0665

800.283.8385 • [rbc.org](http://rbc.org)

Facebook, Instagram, Twitter, YouTube icons

## NBC Contributes to WEF Manual of Practice

Last month the Water Environment Federation (WEF) released the 7th edition of their Manual of Practice #8 “Design of Water Resource Recovery Facilities”, a principal guidebook used by practitioners across the country for the design and upgrade of wastewater facilities. NBC Principal Environmental Engineer **Dr. CJ Spellman** served as a technical editor and reviewer for the manual as a member of WEF’s Design of Water Resource Recovery Facilities Task Force. NBC is acknowledged in the manual’s Preface, and was the only Utility named as a contributor to the development of MOP 8!



— Submitted by CJ Spellman

# Annual NBC Pumpkin Decorating Contest



FP Maintenance



Finance



HR



Environmental Monitoring



Finance



Customer Service



TAC



Legal



Accounting



Executive

## NBC Put on its Best During the Annual Spirit Week

NBC's annual Spirit Week and Pumpkin Decorating Contest was a huge success! NBC went with a Carnival theme this year and the pumpkins did not disappoint, there was some tough competition! Departments really showed off their creativity, hardwork, and dedication to this annual event. Especially our 1st place winners, FP Maintenance, congratulations!

Congratulations to Payroll Supervisor Renee Patterson-Rinaldi on winning the Costume Contest. Renee was dressed as a fortune teller, perfect fit for NBC's Carnival theme, she read guests cards and fortunes throughout the event.



Thank you to everyone who participated!

## Congratulations FP Employee of the Year & Team of the Year!

Congratulations to Field's Point Employee of the Year, **Norman Rodolewicz** and Field's Point Team of the Year, **Clifford Darosa, Brannon Green, Norman Rodolewicz Al Montijo, Norman Ellinwood, Mark Taylor, Bryan Blackmore, Daniel Strong, and Brian Lalli!**

Norman Rodolewicz FP Mechanic II, is one of the most professional and organized employees here at NBC. He has helped many new mechanics and new supervisors with training, sharing his skills and knowledge on mechanical aspects throughout the facility. Norman is someone FP can always count on



*Norman Rodolewicz and Jason Trenholm*

day or night, he has an excellent attendance record and will always work overtime when needed and steps up to the plate whenever there is an emergency.

The FP Maintenance crew listed above have really put the definition in "teamwork" here at NBC. This crew's quick thinking and efforts to contain the screw lift pump motor fire a few months back until emergency personnel arrived were critical. The team did an outstanding job handling this dangerous situation and keeping everyone's safety in mind.



*Left to right: Norman Ellinwood, Norman Rodolewicz, Cliff Darosa, Mark Taylor, Brian Lalli, Daniel Strong, Brian Blackmore*

Thank you to the Awards Committee; Nik Carroccio, Pam Ciolfi, Liam Walsh, Sean O'Keef and Jason Trenholm for the year-long planning and review of candidates as well as putting the award ceremony together. Also, shout out to all the staff that submitted nominations, all nominations were outstanding candidates! Congratulations to all!



# NBC Pipeline

December 2025

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

## Calendar of Events *for December*

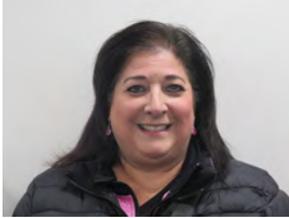
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3 Know Your Numbers 9 AM - 12 PM COB	4 Full Moon	5 Payday	6
7	8	9 BOC Meeting 11 AM COB	10	11 COB, IM, PT & WQSB Employeee Appreciation 1-3 PM	12	13
14  Hanukkah Begins	15	16 FP Employee Appreciation (All Shifts)	17	18 BP Employee Appreciation (All Shifts)	19 Payday	20
21  Winter Solstice	22 Hanukkah Ends	23	24  Christmas Eve	25  Christmas Day Office Closed	26 Kwanzaa Begins	27 Last Day to use Use-or-Lose Vacation or Personal Time
28	29	30	31  New Year's Eve			



# News Briefs...

Welcome...

## Meet Meet Maria Crowley!



Maria started on December 1st as a Customer Care Representative. She lives in Cranston and has a son, grand son and two Rottweilers. She enjoys spending time with her dogs, going to the beach and hopes to travel more.

## Meet Ian Savastano!



Ian started on November 17th as NBC's Lab Technician. He grew up in Coventry but now lives in Richmond, RI. He has a dog named Peter and a cat named Halo. Ian likes to hike or go to the gym after a long day. Ian has some pretty cool talents, he can juggle and solve a Rubik's cube.

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## Save the Date: Upcoming Holiday Employee Appreciation Events this Month

**Thursday, December 11th:** COB, IM, WQSB, & PT

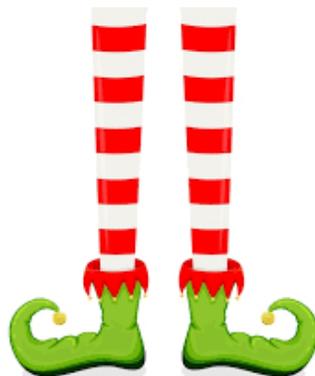
Location: FP Lunchroom,  
1 - 3 PM

**Tuesday, December 16th:**

Field's Point - All shifts  
Location: FP Lunchroom

**Thursday, December 18th:**

Bucklin Point - All shifts  
Location: BP Lunchroom



## Use or Lose by December 27th



The deadline for utilizing "Use or Lose" vacation and personal time is December 27th, 2025. Please be sure to review your accruals on SharePoint and plan accordingly. Scheduling and approval for the use of all vacation and personal time must be coordinated and approved by your supervisor.

---

## Know Your Numbers

NBC's Know Your Numbers health screening event will take place on **December 3rd, 9 AM - 12 PM in the COB Main Conference Room.**

If you would like to participate click the link to register and sign up for a specific time slot or walk-ins are always welcome.



[Register here.](#)

This free screening event will screen:

- + Cholesterol
- + Blood Pressure
- + Glucose (blood sugar) level
- + Sun Safety Screening (Dermaview)

This event is part of the NBC Wellness Incentive program. Eligible employees have the opportunity to receive up to \$200 for completing the screenings. Forms will be provided at the event.

There will be giveaways for attendees, prizes will be given to the 1st, 5th, 10th and 15th employee to complete their health screening.



Congratulations to Field's Point Senior Process Monitor **Sean O'Keefe** on obtaining his Grade IV Operator Certificate!

Great Job, Sean!

## December Casual Day Fund Raffle

NBC will host its annual Casual Day Fund Raffle in December. If you currently contribute to the Casual Day Fund, you will automatically be entered into the raffle. If your name is chosen, the Casual Day Fund will make a \$500 donation to the 501(c)(3) charity of your choice.



Qualifying charities must be a recognized 501 (c)(3) and cannot be political or religious in nature. If you are not currently contributing to the Fund, contact payroll and join the effort!

## Spirit of Giving Holiday Drive for Children's Friend & Service

NBC will be participating in the Spirit of Giving Holiday Drive for Children's Friend and Service to help families in need this year.



This donation drive is unique from other toy and donation drives this time of year because Children's Friend is actively involved with every child or family who benefits. Children and their families will continue receiving wrap-around support from the agency, even after the holidays.

### NBC will be collecting:

- + coats, children of all ages
- + toys, children of all ages
- + diapers & wipes
- + pajamas, children of all ages.

Donations can be placed in the marked bins at the COB, FP Administration Building, WQSB, and BP Administration Building. **Donations will be collected up until Thursday, December 18th.**



**Blood Drive Results**  
Narragansett Bay  
Commission  
11/10/25

3 donations      9 potential lives saved

**Thank you, Lifesavers.**

800.283.8385 · ribc.org      @ribc

## NBC Staff Educate Future Wastewater Professionals through 10-week Program

CCRI has been offering a 10-week, 250 hour Clean Water Workforce training program in partnership with Real Jobs RI and the RI Department of Labor and Training. Participants will gain foundational knowledge and practical experience in drinking water and wastewater operations, covering systems, tools, safety protocols, basic math and science, OSHA-10, and RIDEM and RIDOH Operator 1 certification preparation. This program includes classroom instruction, lab work, site visits, and a 50-hour job shadowing placement with a local employer all for FREE.

NBC's Director of Environmental Science & Compliance **Walter Palm** and Environmental Monitoring Supervisor **Tyler Bissonnette** have been teaching in this program, Walter leading the chemistry portion and Tyler leading the wastewater class.



For anyone interested or anyone you may know that might interested can visit, [CCRI](#), details for the spring session will be added in December.

## Safety Corner

In November, NBC's Safety Team partnered with Beacon Mutual Insurance to provide ergonomic assessments for interested employees. Ergonomics plays a critical role in creating a safe and healthy work environment by reducing strain, preventing injuries, and improving overall productivity. Some of NBC's TAC staff shared some of the positive feedback from these assessments with many employees reporting a significant improvement in comfort levels. **If you would like the opportunity to have an ergonomic assessment, please reach out to Kelsie Bryer (ext. 579) or Dave Aucoin (ext. 418) with your interest and you will be added to the waitlist for the next round. Date TBD.**

**Tyler Bissonnette**, TAC (WQSB): During the assessment with Tyler, he noted how his position has changed, and he will spend more time at his desk per week now than previously when he was more field based. It was noted that all of Tyler's equipment was skewed to the right on his desk.



### Ergonomic modifications:

- (1). Move monitors and equipment to the left - during the assessment, both of Tyler's monitors, keyboard and mouse were moved to the left to provide additional space for him to work.
- (2). Increase monitor height - the height of his monitors was increased by placing packs of copy paper beneath them to produce additional height to their respective bases.

### **Eliza Moore**, TAC (WQSB):

Eliza was part of a prior ergonomic assessment and wanted to check in to note how the changes made during the prior assessment had helped her. She was open to any additional suggestions with respect to how her workstation was configured.



### Ergonomic Modifications:

- (1). Elevate monitor height - the only other suggestion offered to Eliza during the assessment of her space was to potentially increase the height of her monitors so that the top borders were closer to eye level. Currently, the setup is a bit lower and could contribute to neck strain.

—Submitted By Kelsie Bryer



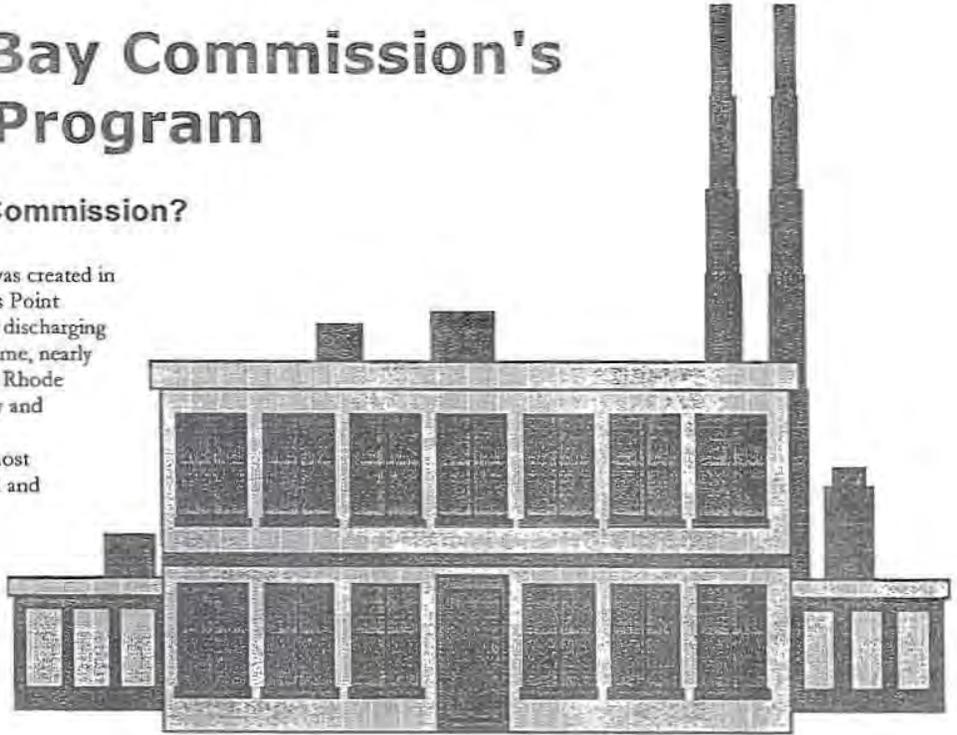
# ***EDUCATIONAL DOCUMENTS***

# Narragansett Bay Commission's Pretreatment Program

## What is the Narragansett Bay Commission?

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

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



## What is the purpose of a Pretreatment Program?

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

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

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

## How effective is the Pretreatment Program?

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

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

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

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

## How were permit fees determined?

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

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

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

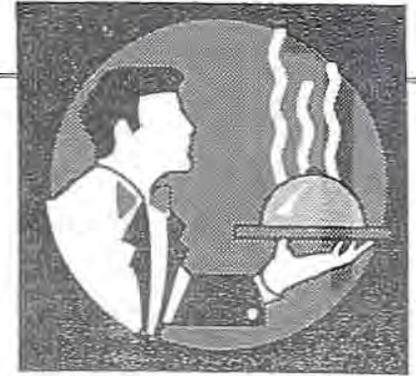
## What if I need technical assistance?

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

## What if I have more questions?

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

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



## *What is the Narragansett Bay Commission?*

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

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

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

## *What is a Grease Removal Program?*

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

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

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

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

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

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

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

## *What is a GRU?*

A GRU is a device designed to collect

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

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

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

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

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

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

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

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

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

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

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

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

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

*What is required by the Wastewater Discharge Permit?*

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

*What if I have more questions?*

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

# NARRAGANSETT BAY COMMISSION



## ENVIRONMENTAL

BEST

MANAGEMENT  
PRACTICES

*for*

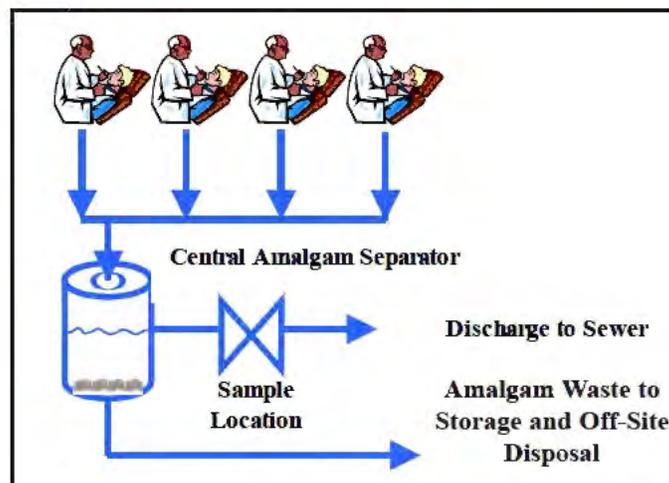
## the Management of Waste Dental Amalgam

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



## NBC BMP Implementation with the Installation of an Amalgam Separator

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



*Typical wastewater plumbing diagram for dental office with an amalgam separator*

## Specific Requirements for NBC Dental BMP Option

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

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

## Maintenance of Amalgam Separator

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

## Certification and Record Keeping

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

## Best Management Practices

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

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

# Best Management Practices

## Chair Side Traps

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

## Maintenance of Chair Side Traps

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

## Maintenance of Vacuum Pump Filters

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

## Storage, Management and Disposal of Scrap Amalgam

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

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

## Line Cleaners

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

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

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

## Best Management Practices

### Clean Plumbing and Sink Traps

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

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



### Sinks Located in Operatories

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

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

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

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

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

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

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

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

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

# Wastewater Discharge Permit Requirements

## Annual Certification and Record Keeping

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

## Personnel Training Requirements

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

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

## Waste Management and Spill Response

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

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

## Steps to take in case of a spill:

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

## What Not to do when there is a spill:

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

## Emergency Contacts

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

Narragansett Bay Commission: (401) 461-8848

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

National Response Center: (800) 424-8802

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

Local Hospital: \_\_\_\_\_

Fire Department: \_\_\_\_\_

## Useful Web Sites

[www.narrabay.com](http://www.narrabay.com)  
[www.epa.gov/mercury/index.html](http://www.epa.gov/mercury/index.html)  
[www.state.ri.us/dem](http://www.state.ri.us/dem)  
[www.newmoa.org](http://www.newmoa.org)

### Pollution Prevention

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

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

### Hazardous Waste Management

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

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

#### Waste Generation

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

#### Waste Storage

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

#### Waste Shipment

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

#### Record-keeping

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

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

# THE GREASE BUSTING ADVENTURES OF MR. CAN!

Quick guide to proper grease disposal



Meanwhile in Providence, RI...

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

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

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

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

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

WHAT WAS THAT?!

WHAM!

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

Get a load of  
my cooling  
wand!

**ZAP!**

FOR PROPER GREASE  
DISPOSAL,  
COOL IT & CAN IT!

Together we can keep  
the grease beasts off the  
streets!



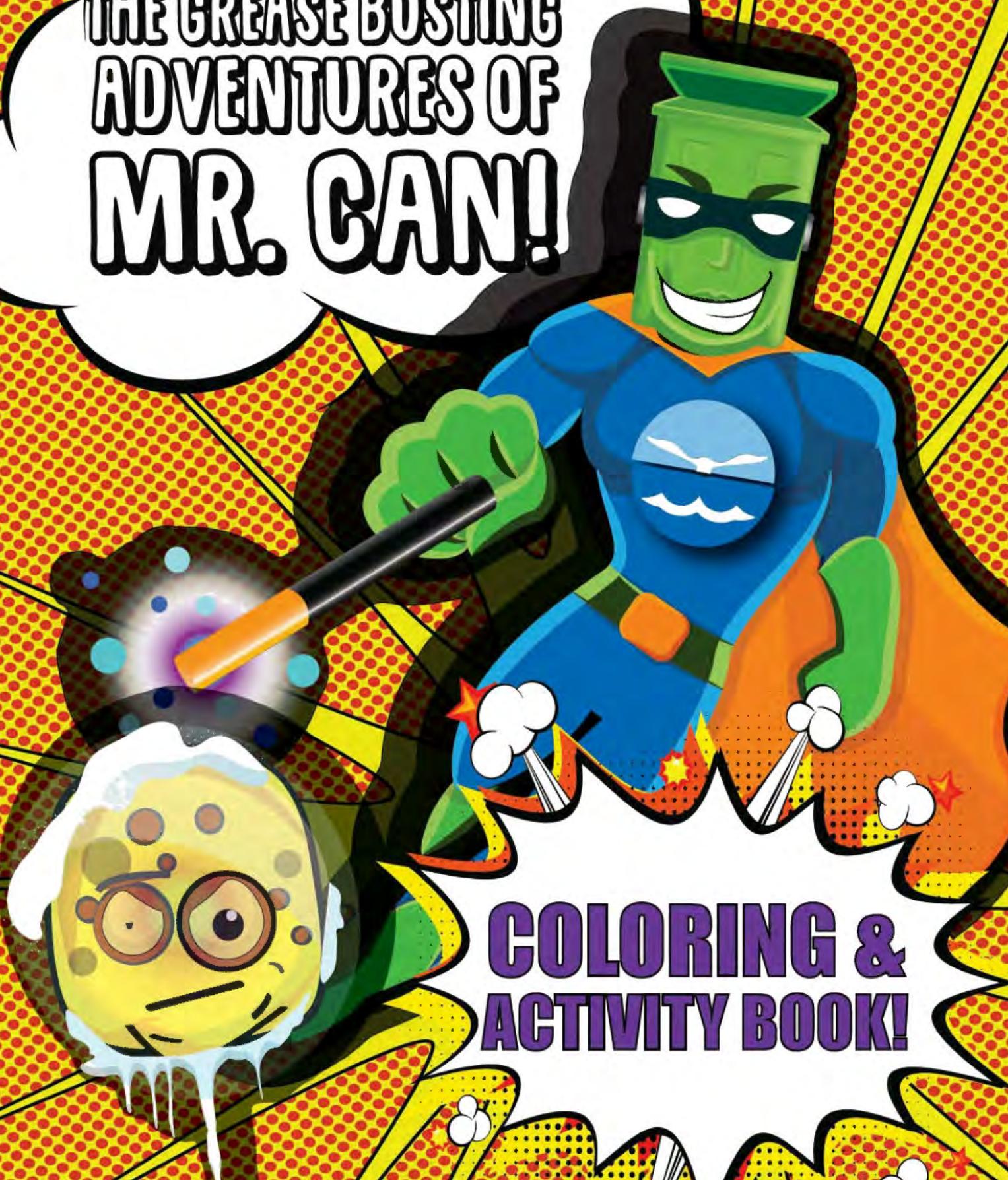
Narragansett Bay Commission

One Service Road, Providence, RI 02905

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



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



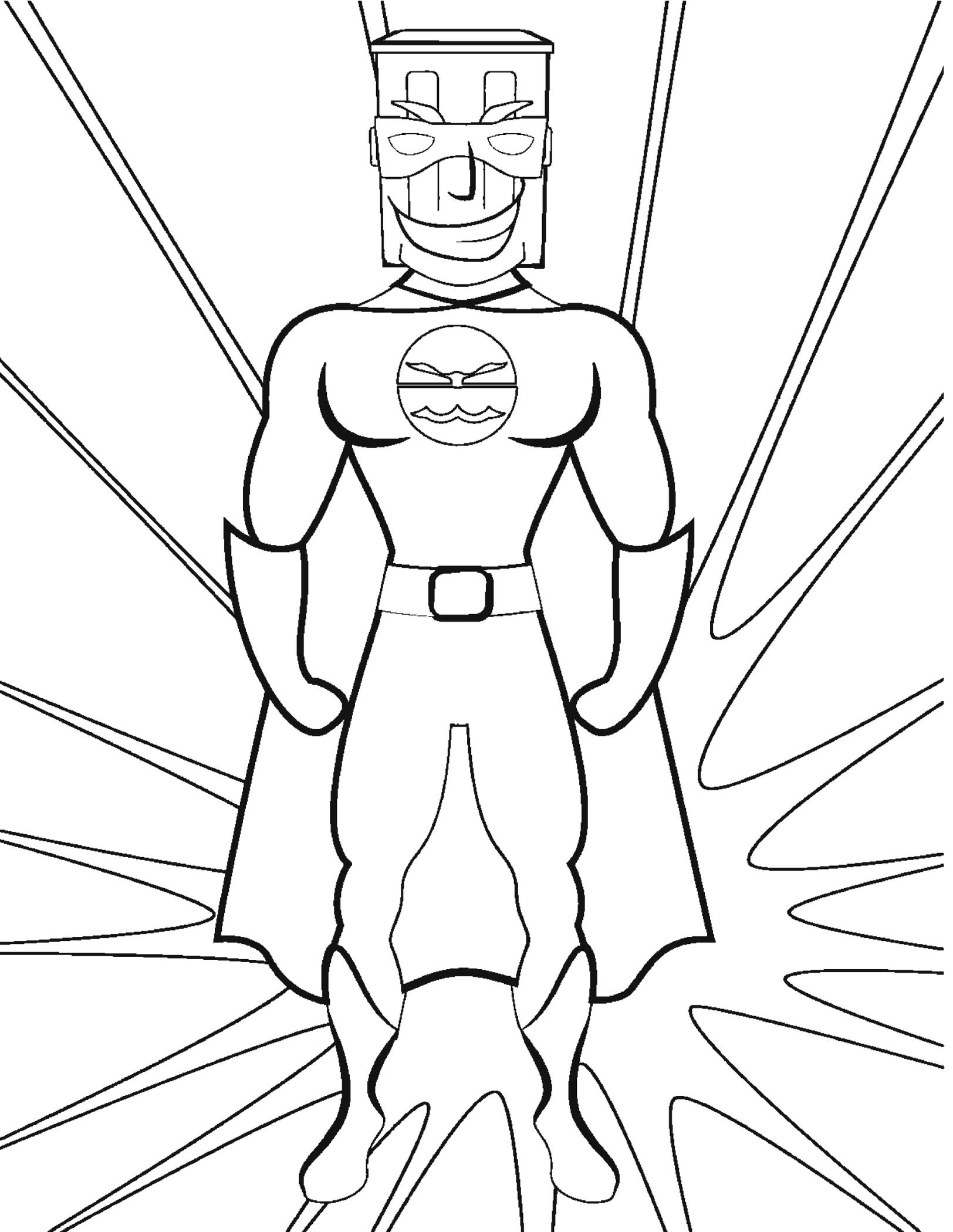
**COLORING &  
ACTIVITY BOOK!**

**COOL IT  
& CAN IT!**



\_\_\_\_\_

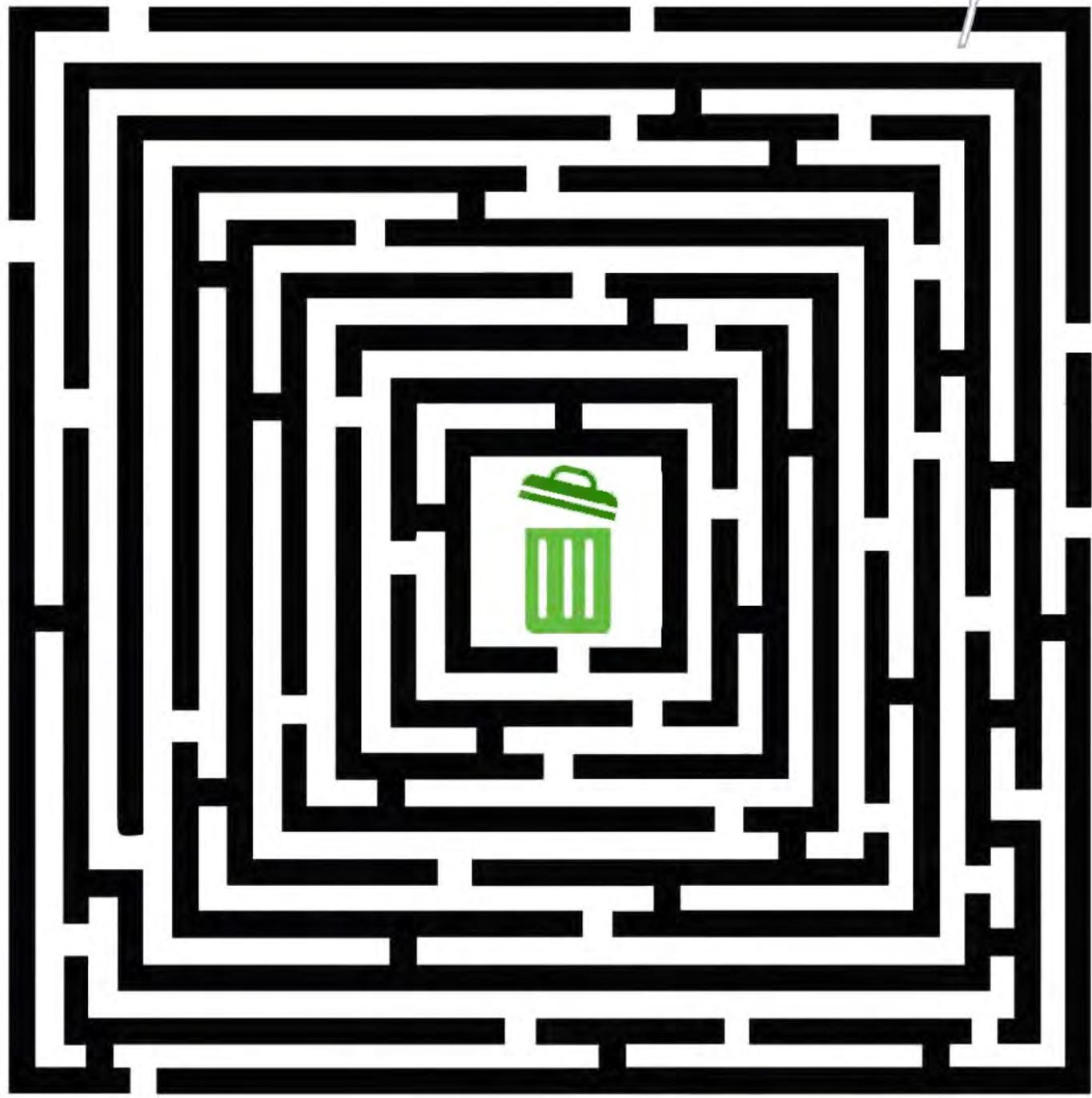
**Pledge to COOL IT & CAN IT and  
help Mr. Can share the message  
of proper grease disposal!**



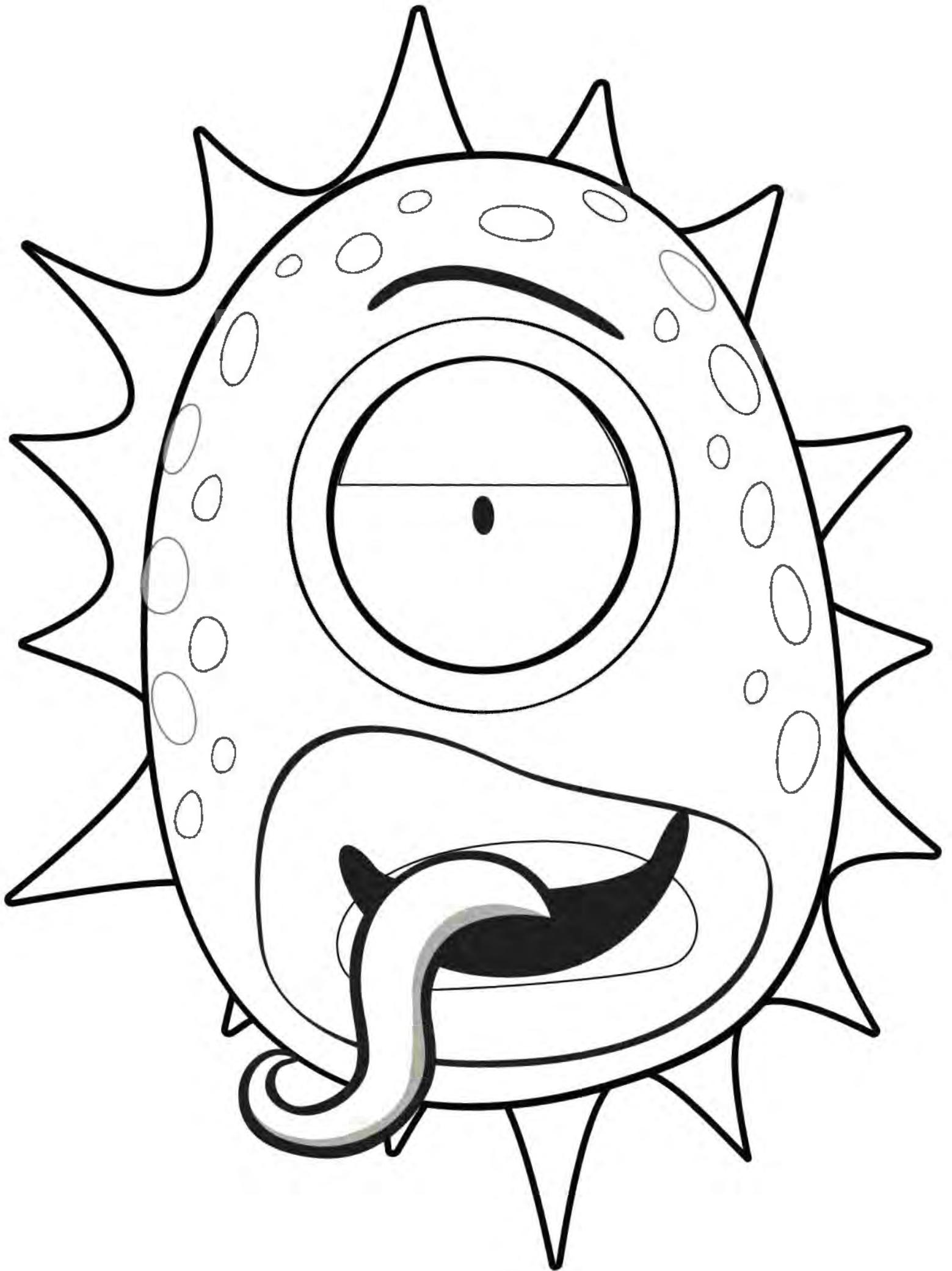
# GUIDE THE GREASE!



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



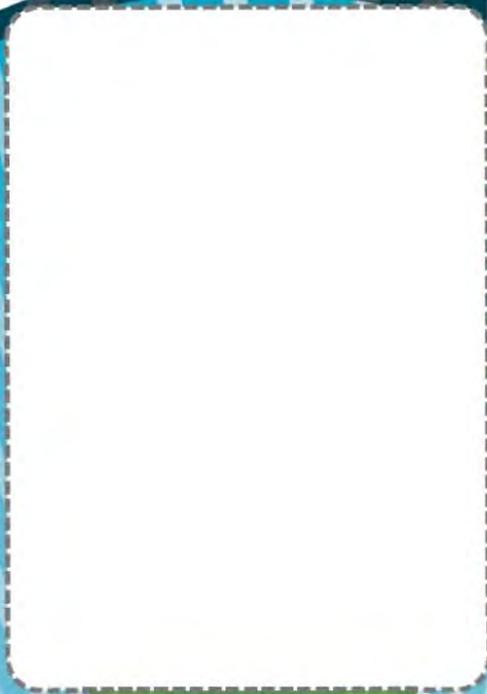






# SUPER HERO FACE SWAP!

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







WASTEWATER TREATMENT  
FACILITY IMAGE 1

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



WASTEWATER TREATMENT  
FACILITY IMAGE 2





ZAP!!



LARD  
VEGETABLE OIL

DRIPPINGS  
GREASE

MR. CAN  
NBC

WATER  
COOL IT

CAN IT  
NARRAGANSETT BAY

LGNMXIARCANITTSNAAT  
LRKBGNVEGETABLEOILA  
LEDECBLIWIWATEROETS I  
AACOOLITVDRIPPIN GSM  
RSTIVNADSNXMRCA NP H  
DET NARRAGANSETT BAY





# DRAW COMIC STYLE!

## STEP 1

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



## STEP 2

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



# DRAW COMIC STYLE!

## STEP 3

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

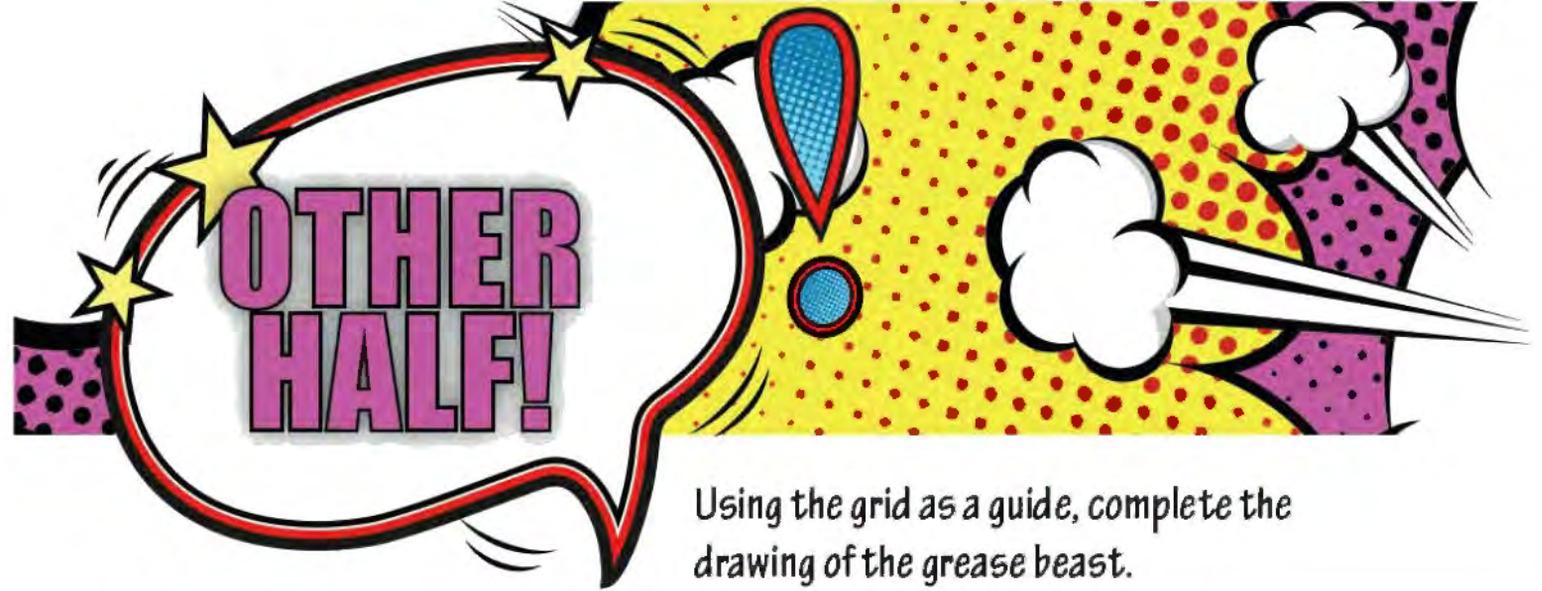


## STEP 3

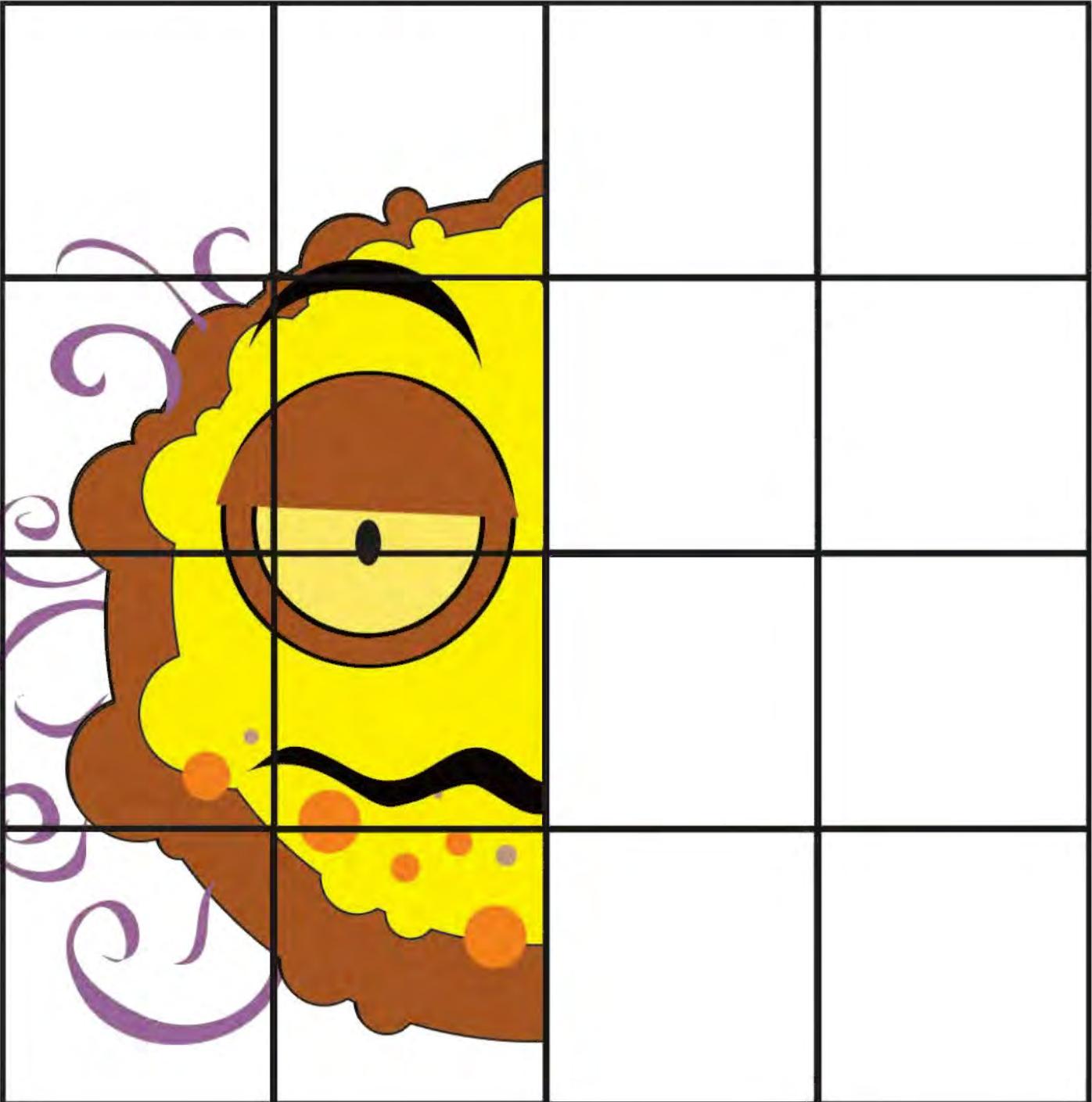
Use a heavier pencil to add more detail and shadow. Go over the drawing in black ink pen or marker, then color your super hero in bright, comic-book colors!

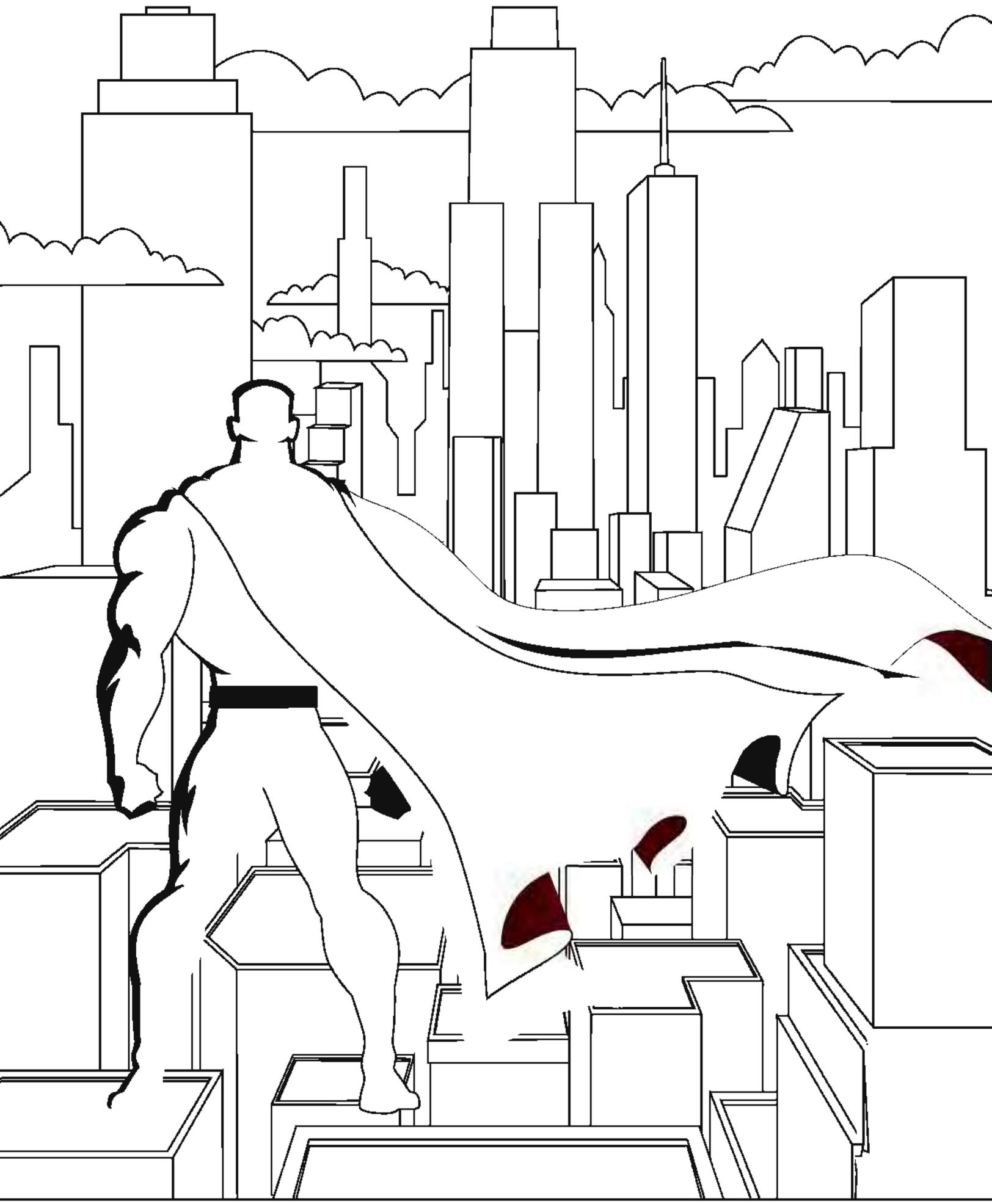


Comic style is about exaggerated elements and simple features. Once you've mastered your super hero, try drawing a whole comic strip!



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

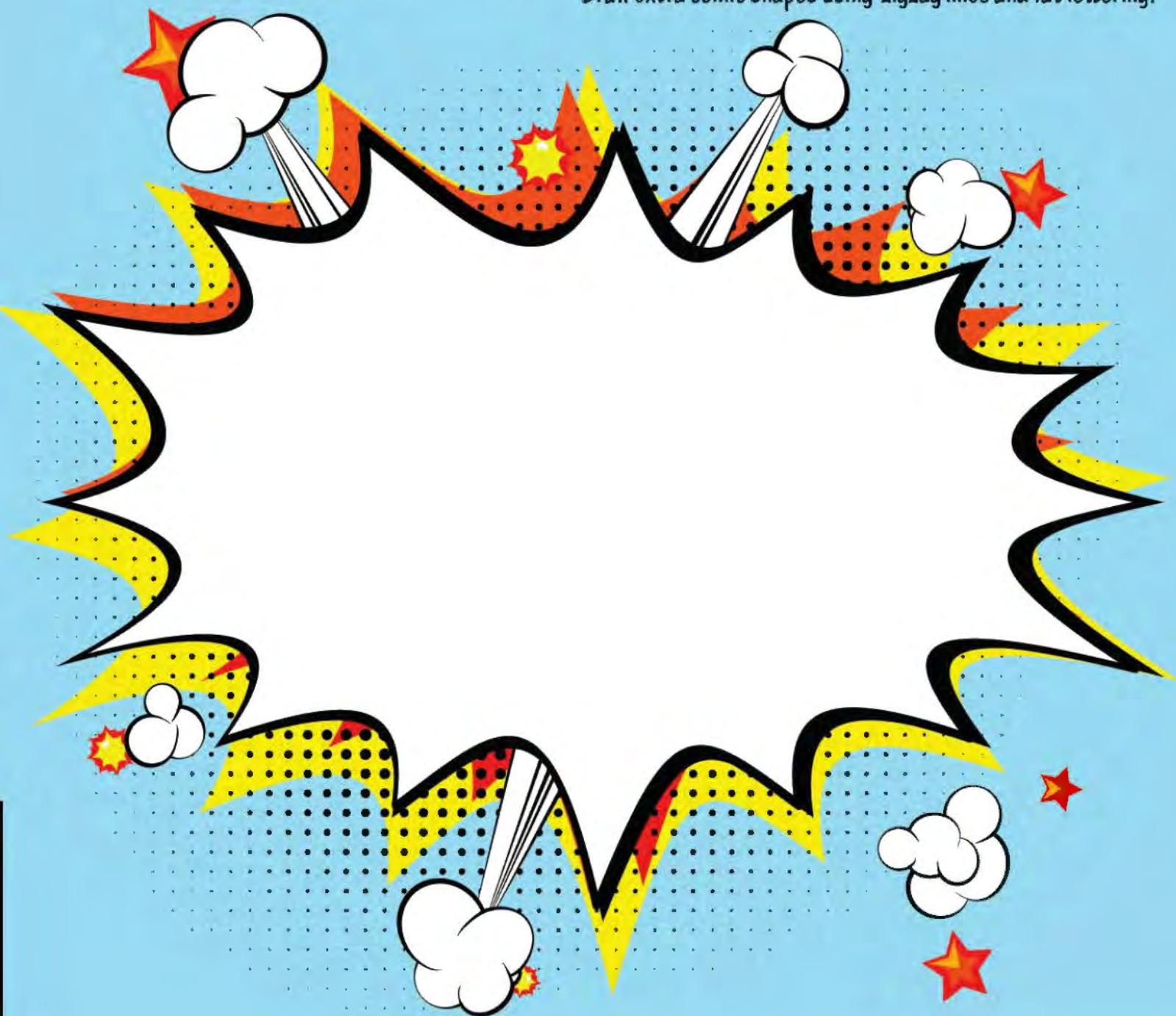






# COMIC STRIP ADVENTURE!

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





**COOL IT  
& CAN IT!**

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

**Narragansett Bay Commission**

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

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

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

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

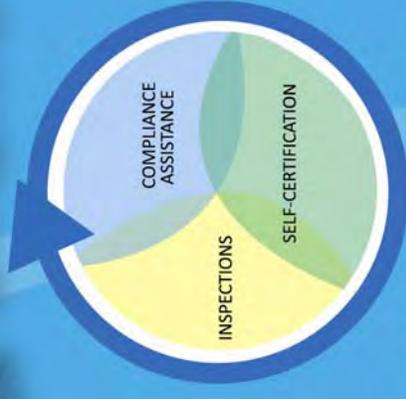
- On-site Technical Assistance
- Workshops
- Development and use of FOG Best Management Practices (BMPs)
- FOG management "Self-Evaluations"
- Compliance Inspections
- FOG data collection and analysis



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

NARRAGANSETT BAY COMMISSION

**FATS, OILS, & GREASE**



**ENVIRONMENTAL RESULTS PROGRAM**

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

## Fats, Oils and Grease

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



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

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

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

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

### The NBC FOG Environmental Results Program

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

#### 1. Compliance Assistance

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

#### 2. Self Evaluation

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

#### 3. Regulatory Inspections

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

#### 4. Certification

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

## Biodiesel Production

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



To participate in the NBC FOG-ERP, complete the self-evaluation checklist in the NBC Fats Oils & Grease Compliance and Best Management Practices Workbook and mail a copy to:

Narragansett Bay Commission  
Pollution Prevention Program  
One Service Road

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

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

## WHAT ELSE SHOULD I KNOW?

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

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

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

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

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

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

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



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

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

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



## NARRAGANSETT BAY COMMISSION

### LINCOLN SEPTAGE RECEIVING FACILITY

## *Septage Acceptance Policy Summary*



# OVERVIEW

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

## PERMITTING REQUIREMENTS

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

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

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

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

## MANIFEST REQUIREMENTS

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

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

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

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

## PROCEDURES TO BE FOLLOWED AT THE STATION

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



# Narragansett Bay Commission

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

### Vacation Shutdown Prohibited Sewer Discharges

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

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

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

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

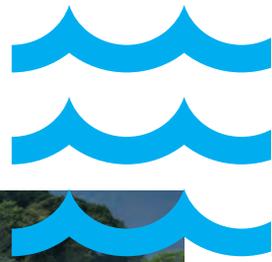
Vincent J. Mesolella, *Chairman*

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



# RestoredWaters RI

A Narragansett Bay Commission Project



## Controlled Blasting Information

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

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

### What is blasting?

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

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

### How can I find out when a blast will occur?

You can opt in to email notifications at [RestoredWatersRI.com](http://RestoredWatersRI.com).

### Will I feel the blast?

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

### Why do some blasts feel stronger than others?

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

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

### Blasting for RestoredWaters RI:

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

### Who sets the guidelines for safe and effective blasting?

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

### Do you want to dig deeper into blasting?

Visit [RestoredWatersRI.com/blasting](http://RestoredWatersRI.com/blasting)

***ATTACHMENT VOLUME I***

***SECTION 2***

***TYPICAL NBC WASTEWATER  
DISCHARGE PERMITS***

***TYPICAL METALFINISHER  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P1112-251-0630

Company Name: **MONARCH METAL FINISHING CO., INC.**

Permitted Facility: **Georgia Avenue**

Facility Address: 189 Georgia Avenue, Providence, RI 02905

Mailing Address: 189 Georgia Avenue, Providence, RI 02905

Facility President: Mr. Marc Marandola

Facility Authorized Agents: Mr. Stephen DiPrete, Mr. Mario Cabral

User Classification: Metal Finishing Operations

Categorical Standards Applicable: 40 CFR §433.17, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Marc Marandola and Monarch Metal Finishing Co., Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 18 pages with conditions A - X.

**This permit becomes effective on July 1, 2025  
and expires on June 30, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

June 24, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee agrees that the average discharge per calendar day of metal finishing process wastewater is greater than or equal to 10,000 gallons but less than 50,000 gallons. Decreasing or increasing the average daily water usage may affect the annual permit fee and/or the monitoring frequency. The permittee must notify the NBC of any deviations from the aforementioned average flow range so that required permit modifications may be made.
5. The permittee is classified as a Metal Finisher and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §433.17, Pretreatment Standards for New Sources. EPA regulations require that Metal Finishers maintain full compliance with the EPA Total Cyanide Metal Finishing maximum limit of 1.20 ppm and the monthly average limitation of 0.65 ppm at the combined point of cyanide process discharge, prior to combining with non-cyanide bearing wastewater streams, and at the discharge from the cyanide treatment system. Upon conducting an engineering review of the facility, it has been determined that the discharges from the continuous cyanide oxidation tank are the only waste streams contaminated with cyanide. A sampling location has been installed downstream of the continuous cyanide oxidation tank. The EPA Total Cyanide Metal Finishing limitations will be enforced at this sampling location. The NBC Total Cyanide limitations will be enforced at the final discharge location.

## **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Non-Cyanide Bearing Metal Finishing Rinsewaters;
  - b. Treated Cyanide Bearing Metal Finishing Rinsewaters;
  - c. Treated Acid Cleaner Solutions;
  - d. Treated Zinc Brite Solution;
  - e. Treated Alkaline Cleaner Solutions;
  - f. Treated Hot Soak Solution;
  - g. Treated Ultrasonic Solution;
  - h. Treated Electrocleaner Solution;
  - i. Treated Wet Tubbing Solution;
  - j. Treated Vibratory Solution;
  - k. Treated Non-Cyanide Bearing Floor Spills and Floor Wash Water;
  - l. Treated Cyanide Bearing Floor Spills and Floor Wash Water;
  - m. Boiler Blowdown.
  
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

## **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Concentrated Electroplating Solutions;
  - b. Concentrated Cyanide Solutions;
  - c. Gold Plating Solution;
  - d. Gold Plating Rinses and Dragouts;
  - e. Silver Plating Solution;
  - f. Silver Plating Rinses and Dragouts;
  - g. Acidic Solutions with a pH less than 5.0 standard units;
  - h. Caustic Solutions with a pH greater than 11.0 standard units;
  - i. Degreasing Solutions;
  - j. Solvents;
  - k. Sludges;
  - l. Fuel and Lubricating Oils.
  
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.

3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 – Sample port on the final discharge line located near the polishing area, collecting all process discharges specified in Section B(1)(a through m) of this permit.

Sample Location #2 – Sample port on the discharge line of the continuous cyanide oxidation tank, collecting all process discharges specified in Section B(1)(b and l) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling locations. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #2 must be in compliance with the EPA Metal Finishing Standards referenced in Section A(5) of the permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

## **E. Boiler Facility Requirements:**

1. The permittee has hard plumbed all boiler blowdown discharges to the pretreatment system. Daily visual inspections of steam condensate must be documented in the logbook as required in Section H(2) of this permit.
2. The permittee has permanently sealed all open floor drains and any other open process wastewater and sewer discharge connections, so as to prevent an incidental or accidental discharge from the boiler room.
3. The permittee has permanently sealed all open drains within oil storage tank vaults or located under buried tanks which connect to the sewer, so as to prevent an incidental or accidental discharge.
4. The permittee shall oversee each oil tank filling to ensure fuel oil does not spill from the fill, overflow or vent locations and discharge to the sewer. Each tank filling operation must be documented in the logbook required in Section H(2) of this permit.
5. The permittee is strictly prohibited from discharging spilled oil contained in the boiler facility, fuel storage area(s), etc. into the sewer. Spilled oil must be collected for proper off-site disposal. The permittee must take appropriate measures as described above and any others necessary to ensure a spill will not discharge to the sewer system.

## **F. Zero Discharge/Recycle Operation Requirements:**

1. The permittee shall operate and maintain a zero process discharge wastewater evaporation and recycle pretreatment system as illustrated in the plans that have been approved by the NBC. This system shall be used specifically for the purpose of eliminating discharges from the following process operations:
  - a. Gold Plating Operations;
  - b. Silver Plating Operations.
2. The permittee shall make no changes to the aforementioned process tanks or evaporation and/or recycle systems without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the treatment systems on the plans approved by the NBC may be treated on-site in the pretreatment equipment.
3. If any problems with the evaporation and/or recycle systems arise or if the permittee would like to connect to the sewer for the purpose of discharging gold plating solutions or silver plating solutions, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to the process tanks, the evaporation system, or associated piping.

4. The permittee has capped-off and sealed all sewer drain lines associated with the gold plating solution, silver plating solution and their associated rinses and/or dragouts. They must remain capped-off and sealed so that no process wastewater may be discharged to the sewer through sanitary or any other sewer connection from the zero discharge operations, excluding permitted satellite process discharge locations.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming gold plating or silver plating process wastewater discharges to the sewer may be considered an intentional violation of the NBC's Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

**G. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December until the expiration date of this permit.
  - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the final discharge line located near the polishing area, Sample Location #1. The composite samples collected in April and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

The composite samples collected during all other sampling months are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Nickel (Total)	Zinc (Total)
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- b. On the same day that the composite samples listed in Section G(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over the entire operating day from the sample port on the final discharge line located near the polishing area, Sample Location #1 (i.e. one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.
- c. On the same day that the composite samples during the months of January and July are being collected, the permittee shall collect a minimum of four (4) grab samples over the entire operating day from the sample port on the discharge line of the continuous cyanide oxidation tank, Sample Location #2, prior to combining with any other non-cyanide bearing wastestream. Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**. This sample must be in compliance with the EPA Metal Finishing Total Cyanide Standards referenced in Section A(5) of this permit.

Table 2 attached hereto summarizes the sampling requirements for this facility.

3. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.

4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
5. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
6. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **H. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;
  - d. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
  - e. The amount of chemicals added to provide pretreatment of batch discharges;

- f. pH and chlorine residual readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
  - g. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.
- 2. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the boiler operation, including but not limited to the following:
  - a. A listing of each boiler facility blowdown visual inspection documenting the date, time, person conducting the blowdown and the appearance of the blowdown. This procedure ensures that a prohibited material is not discharged;
  - b. A listing of the date of each fuel tank filling.
- 3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

### **I. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

### **J. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

## **K. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

### **L. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

### **M. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

### **N. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Monarch Metal Finishing Co., Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Monarch Metal Finishing Co., Inc. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Monarch Metal Finishing Co., Inc. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership Monarch Metal Finishing Co., Inc. shall be subject to the terms and conditions of the permit as if named herein.

**O. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**P. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

**Q. Permit Violations:**

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

### **R. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The NBC shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

### **S. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **T. Duty to Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **U. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **V. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;

- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **W. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **X. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

\* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

\*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Monarch Metal Finishing Co., Inc.**  
**Sampling Requirements**

	<b>Sample Location #1</b>		<b>Sample Location #2</b>	
	<b>Sample Port on the Final Discharge Line Located Near the Polishing Area</b>		<b>Sample Port on the Discharge Line of the Continuous Cyanide Oxidation Tank</b>	
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>	<b>Composite Sample</b>	<b>Parameters</b>
January	X	Cu, Ni, Zn, CN	X	EPA-CN
February	X	Cu, Ni, Zn, CN		
March	X	Cu, Ni, Zn, CN		
April	X	Cd, Cr, Cu, Ni, Pb, Ag, Zn, CN		
May	X	Cu, Ni, Zn, CN		
June	X	Cu, Ni, Zn, CN		
July	X	Cu, Ni, Zn, CN	X	EPA-CN
August	X	Cu, Ni, Zn, CN		
September	X	Cu, Ni, Zn, CN		
October	X	Cd, Cr, Cu, Ni, Pb, Ag, Zn, CN		
November	X	Cu, Ni, Zn, CN		
December	X	Cu, Ni, Zn, CN		

**Legend**

- Cd - Cadmium
- Cr - Chromium
- Cu - Copper
- CN - Cyanide
- Pb - Lead
- Ni - Nickel
- Ag - Silver
- Zn - Zinc

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED METAL FINISHING WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Monarch Metal Finishing Co., Inc.

189 Georgia Avenue

Providence, RI 02905

**PERMIT NUMBER:** P1112-251-0630

**PERMIT EXPIRATION DATE:** 06/30/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

June 24, 2025

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL PHARMACEUTICAL  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B1404-020-0426  
Company Name: **DENISON PHARMACEUTICALS, LLC**  
Facility Address: 1 Powder Hill Road, Lincoln, RI 02865  
Mailing Address: 1 Powder Hill Road, Lincoln, RI 02865  
Facility President: Mr. Douglas Hill  
Facility Authorized Agents: Mr. Raymond Frenette, Mr. Victor Maia  
User Classification: Pharmaceutical Manufacturing Operations  
Categorical Standards Applicable: 40 CFR §439.47, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Douglas Hill and Denison Pharmaceuticals, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 18 pages with conditions A - V.

**This permit becomes effective on June 1, 2021  
and expires on April 30, 2026.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

May 26, 2021  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 16, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts pharmaceutical manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Biochemical Oxygen Demand and Total Suspended Solids limitations for Category 14 specified in Table 1 on page 16, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee is classified as a pharmaceutical manufacturing firm and therefore must at all times comply with EPA Categorical Regulations 40 CFR §439.47, Subpart D, Pretreatment Standards for New Sources. EPA regulations require pharmaceutical manufacturers to maintain full compliance with the maximum daily discharge limit of 20.7 ppm and the monthly average of 8.2 ppm for n-amyl acetate, ethyl acetate, and isopropyl acetate. Subpart D of the pharmaceutical regulations also requires categorical pharmaceutical manufacturers to maintain full compliance with the maximum daily discharge limit of 3.0 ppm and the monthly average limit of 0.7 ppm for methylene chloride. NBC discharge limits for the Bucklin Point Treatment Facility do not exist for n-amyl acetate, ethyl acetate, and isopropyl acetate. The categorical limits are therefore in effect for these parameters. Methylene chloride and acetone are included in the NBC list of Total Toxic Organics and must meet the more stringent local limit of 2.13 mg/L. NBC discharge limits for all other parameters in this permit are more stringent than the EPA categorical limitations. Therefore, NBC local limits will be applied and enforced for all other parameters.

## **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions or process wastewater streams to the NBC facilities:
  - a. Treated Process Tank Wash Water;
  - b. Treated Laboratory Glassware Wash Water;
  - c. Reverse Osmosis Reject Wastewater;
  - d. Carbon Filter Backwash;
  - e. Softener Regenerant Wastewater;
  - f. Treated Air Compressor Condensate;
  - g. Non-Contact Cooling Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

## **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Off-specification Product Batches;
  - b. Concentrated Raw Materials and Solutions;
  - c. Acidic Solutions with a pH less than 5.0 standard units;
  - d. Caustic Solutions with a pH greater than 11.0 standard units;
  - e. Degreasing Solutions;
  - f. Solvents;
  - g. Sludges;
  - h. Fuel and Lubricating Oils;
  - i. Laboratory Chemicals.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 16, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

## **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Effluent monitoring station, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit and with the EPA Pharmaceutical Manufacturing Standards referenced in Section A(5) of this permit.

2. The permittee shall provide additional pretreatment of the process wastewater discharges listed in Section B(1) above if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of additional pretreatment systems must be submitted to the NBC for approval before beginning construction.
3. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

## **E. Monitoring Requirements:**

1. The permittee shall monitor the final pH, and volume of each treated batch discharge and shall record the data in the pretreatment system logbook referenced in Section F(1) of this permit. The final pH, and volume of each batch discharge is to be reported to the NBC monthly on a summary report within thirty (30) days from the end of the month in which the data was recorded. (See sample copy enclosed).
2. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must conduct sampling from the effluent monitoring station, Sample Location #1, while a batch discharge is occurring.

- a. During the months of January, April, July, and October, one grab sample is to be collected in a glass container having a total volume greater than 20 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If the sample is known to contain residual chlorine, add sodium thiosulfate preservative (10 mg/40ml) to the empty sample bottles just prior to shipment to the sample site. If the sample is tested and residual chlorine is present then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4° C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. The grab sample is to be analyzed within fourteen (14) days of collection by EPA Method 1666 for the following **Volatile Organic Compounds** specific to the Pharmaceutical Manufacturing Industry:

n-Amyl acetate  
Ethyl acetate  
Isopropyl acetate  
Methylene Chloride

- b. During the months of January, April, July, and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected, preserved, and analyzed in accordance with analytical method number D3695, D4763, 524.2, or 1624 and with EPA protocols for the following parameter:

Acetone

- c. During the months of April and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4° C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.

- d. During the months of April and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected in a 1000 ml (minimum) glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA Regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate shall be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base and Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
- e. During the months of January, April, July, and October, until the expiration date of this permit, one grab sample must be collected in a glass bottle. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The sample must be collected and preserved according to EPA protocols and must be analyzed for the following parameter:

Total Oil and Grease (fats, oils, and grease)

- f. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect one grab sample. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameters:

Copper (Total)          Zinc (Total)

- g. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect one grab sample. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameter:

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

Table 3 attached hereto summarizes the sampling requirements for this facility.

3. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
5. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
6. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;

- d. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
  - e. The amount of chemicals added to provide pretreatment of batch discharges;
  - f. pH and chlorine residual readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
  - g. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self--Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

### **G. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

### **H. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

### **I. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

## 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

## 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

**J. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**K. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**L. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Denison Pharmaceuticals, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Denison Pharmaceuticals, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Denison Pharmaceuticals, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Denison Pharmaceuticals, LLC shall be subject to the terms and conditions of the permit as if named herein.

## **M. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

## **N. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **O. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

### **P. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

### **Q. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **R. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **S. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **T. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;

- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

#### **U. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

#### **V. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

KMB:smb

Attachments:

- Self-Monitoring Compliance Report Form
- Batch pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds
- Mass-Based Limits Worksheet

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic(Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Denison Pharmaceuticals, LLC**

**Pharmaceutical Manufacturing**  
**Pretreatment Standards for New Sources (PSNS)**  
**40 CFR §439.47**

<b>Subpart D</b>		
<b>PSNS for Mixing, Compounding, and Formulating Subcategory D</b>		
<b>Pollutant or Pollutant Property</b>	<b>Maximum for Any One Day (mg/L)</b>	<b>Maximum for Monthly Average (mg/L)</b>
n-Amyl acetate	20.7	8.2
Ethyl acetate	20.7	8.2
Isopropyl acetate	20.7	8.2
Acetone*	20.7	8.2
Methylene Chloride*	3.0	0.7

\*Must meet the combined total TTO discharge limit of 2.13 mg/L.

**Table 3**

**Denison Pharmaceuticals, LLC**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Effluent Monitoring Station</b>		
<b>Month</b>	<b>Grab Sample</b>	<b>Parameters</b>
January	X	Cu, Zn, O&G, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
February		
March		
April	X	Cu, Zn, O&G, VOC, EXT, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
May		
June		
July	X	Cu, Zn, O&G, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
August		
September		
October	X	Cu, Zn, O&G, VOC, EXT, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
November		
December		

**Legend**

Cd - Cadmium      Pb - Lead      BOD - Biochemical Oxygen Demand  
Cr - Chromium      Ni - Nickel      TSS - Total Suspended Solids  
Cu - Copper      Ag - Silver      O&G - Total Oil and Grease (fats, oils, and grease)  
CN - Cyanide      Zn - Zinc      VOC - Volatile Organic compounds Portion of TTO List  
EXT - Extractable Portion of TTO List

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED PROCESS TANK WASHWATER, LABORATORY GLASSWARE WASHWATER, REVERSE OSMOSIS WASTEWATER, AIR COMPRESSOR CONDENSATE, NON-CONTACT COOLING WATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Denison Pharmaceuticals, LLC

1 Powder Hill Road

Lincoln, RI 02865

**PERMIT NUMBER:** B1404-020-0426

**PERMIT EXPIRATION DATE:** 04/30/2026

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

May 26, 2021

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL METAL FORMER  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B1506-018-0428

Company Name: **TIFFANY AND COMPANY**

Facility Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Mailing Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Facility President: Mr. Anthony Ledru

Facility Authorized Agents: Mr. Christopher Lepore, Ms. Michelle Park, Mr. Steven Saulen,  
Mr. Robert Alley

User Classification: Non-Ferrous Precious Metal Forming Operations

Categorical Standards Applicable: 40 CFR §471.45, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Anthony Ledru and Tiffany and Company** hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 21 pages with conditions A - W.

**This permit becomes effective on May 1, 2023  
and expires on April 30, 2028.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

April 25, 2023  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a non-ferrous precious metal former and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §471.45, Pretreatment Standards for New Sources. EPA regulations require that non-ferrous precious metal formers maintain production and flow data to ensure full compliance with categorical limitations for cadmium, copper, cyanide, and silver. Table 2 attached to the permit provides concentration based limits calculated from EPA production based limitations and facility production and flow data. The calculations are outlined in Attachment A. Since the EPA limitations in Table 2 are more stringent than the NBC limitations in Table 1, the EPA limitations will be enforced at the final discharge location. Local limitations will be enforced for all other parameters as categorical limitations do not apply.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Pickling Rinsewaters;
  - b. Treated Backwash from Filters;
  - c. Treated Investing Wastewaters;
  - d. Treated Divesting Wastewaters;
  - e. Treated Sanding and Grinding Area Floor Spills;
  - f. Treated Wastewater Treatment Room Floor Spills;
  - g. Treated Hand Wash Sink Wastewaters;
  - h. Treated Annealing Quench Contact Cooling Water;

- i. Treated Shot Casting Contact Cooling Water;
  - j. Non-Contact Cooling Water;
  - k. Air Compressor Condensate;
  - l. Eye Wash Station Discharge.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Concentrated Pickling Solutions;
  - b. Mass Finishing Wastewaters;
  - c. Soak Cleaner Solutions;
  - d. Soak Cleaner Rinsewaters;
  - e. Ultrasonic Cleaner Rinsewaters;
  - f. Ultrasonic Cleaner Solutions;
  - g. Wet Air Scrubber Wastewater;
  - h. Casting Department Chiller Unit Solutions;
  - i. Stamp & Strike Annealing Oven Non-Contact Cooling Water;
  - j. Wet Grinding/Sanding Wastewaters;
  - k. Filtered Polishing Wastewaters;
  - l. Cooling Tower Discharges;
  - m. Electroplating Solutions;
  - n. Acetone Dip Tank Solutions;
  - o. Isopropyl Alcohol;
  - p. Isopropyl Alcohol-Castor Oil Solutions;
  - q. Concentrated Cyanide Solutions;
  - r. Acidic Solutions with a pH less than 5.0 standard units;
  - s. Caustic Solutions with a pH greater than 11.0 standard units;
  - t. Degreasing Solutions;
  - u. Solvents;
  - v. Sludges;
  - w. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.

3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final pH adjustment tank, collecting all process discharges specified in Section B(1) (a through j) of this permit.

Sample Location #2 - Sample port on the discharge line of the oil/water separator in the Mechanical Room, collecting all process discharges specified in Section B(1)(k) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #1 must be in compliance with the EPA Non-Ferrous Precious Metal Former Standards referenced in Section A(4) and Table 2 of this permit.

2. The permittee shall install, operate, and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

## **E. Zero Discharge/Recycle Operation Requirements:**

1. The permittee shall operate and maintain a Zero Process Discharge Wastewater Recycle Pretreatment System as illustrated in the plans that have been received by the NBC. This system shall be used specifically for the purpose of recycling wastewater or eliminating discharges from the following operations:
  - a. Ultrasonic Cleaner Rinsing Operations;
  - b. Soak Cleaner Rinsewaters;
  - c. Mass Finishing Wastewaters;
  - d. Casting Department Chiller Units;
  - e. Wet Grinding/Sanding Operations;
  - f. Filtered Polishing Operations;
  - g. Polishing Department Cleaning Lines;
  - h. Solvent Cleaning Unit Operations;
  - i. Annealing Oven Non-Contact Cooling Water;
  - j. Castor Oil-Isopropyl Alcohol Operations;
  - k. Acetone Dip Tank Operations;
  - l. CNC Cooling Oils.
2. The permittee shall make no changes to the process tanks or zero discharge system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the zero discharge system on the plans received by the NBC on dates referenced in Section E(1) above may be treated on-site in the pretreatment equipment.
3. If any problems with the zero discharge systems arise, or if the permittee would like to connect to the sewer for the purpose of discharging wastestreams referenced in Section E(1) above, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to the process tanks, recycle systems, evaporation systems, or associated piping.
4. The permittee has capped off and sealed all sewer drain lines associated with the process operations identified in Section E(1) above. They must remain capped off and sealed so that no process wastewater may be discharged to the sewer through sanitary or any other sewer connections from the zero discharge operations.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer from the process operations listed in Section E(1) above may be considered an intentional violation of the NBC's Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

**F. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of February, April, June, August, October, and December until the expiration date of this permit.

- a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1. The composite samples collected in April and October are to be collected, preserved and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Nickel (Total)	Zinc (Total)
Copper (Total)		

The composite samples collected during all other sampling months are to be preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Silver (Total)
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- b. During the months of April and October, on the same day that the composite samples listed in Section F(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over the entire operating day from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1 (i.e., one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH

greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

3. During the month of October, until the expiration date of this permit, the permittee shall collect one (1) grab sample from the sample port on the discharge line of the oil/water separator in the Mechanical Room, Sample Location #2. The grab sample for each month is to be collected in a glass bottle and must be preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

Table 3 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC's effluent discharge limitations listed in Table 1. If there are any violations of the NBC's standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC's standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **G. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;
  - d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.
2. The permittee shall be responsible for maintaining production and flow data for all categorical processes, as defined in 40 CFR §471.45 which discharge to the sewer. These records must be maintained at the facility and be available at all times for NBC review. The permittee shall report the production and flow data monthly to the NBC within thirty (30) days from the end of the month in which the data is recorded.
3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **H. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

## **I. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

## **J. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

### **K. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

### **L. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

### **M. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Tiffany and Company shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Tiffany and Company has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Tiffany and Company is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Tiffany and Company shall be subject to the terms and conditions of the permit as if named herein.

### **N. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

### **O. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

### **P. Permit Violations:**

#### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**Q. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The NBC shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

### **R. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

### **S. Duty to Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

### **T. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **U. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **V. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **W. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

CLV:NJD:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**  
**Tiffany and Company**

**US EPA Effluent Discharge Limitations for**  
**Parameters with Categorical Standards**

<b>Parameter</b>	<b>Daily Max. (mg/L)</b>	<b>Monthly Average (mg/L)</b>
Cadmium (Total)*	0.10	0.10
Copper (Total)*	1.05	1.04
Cyanide (Total)*	0.43	0.43
Silver (Total)*	0.35	0.35

EPA discharge limits are based upon average production and flow data for the facility and the Non-Ferrous Precious Metal Forming Pretreatment Standards for New Sources 40 CFR §471.45. See Attachment A of this permit for more details.

\*The US EPA Discharge Limitations are more stringent than NBC Effluent Discharge Limitations listed in Table 1. Permittee will be periodically reviewed and discharge limitations may change as production and water usage change.

**Combined Wastestream Formula (CWF)**

**Alternative Mass Limit Formula**

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

$M_{cwf}$  = alternate mass limit for pollutant

$M_i$  = categorical pretreatment standard mass limit for pollutant in stream i

$F_i$  = average daily flow of stream i (minimum 30 day average)

$F_d$  = average daily flow of dilute wastestream (minimum 30 day average)

$F_t$  = average daily flow through the combined treatment facility (minimum 30 days average)

**Categorical discharge limitation in mg/L**

$$C = M_{cwf} / F_t$$

$F_t$  = average monthly flow through this combined treatment facility

**Table 3**

**Tiffany and Company**  
**Sampling Requirements**

	<b>Sample Location #1</b>		<b>Sample Location #2</b>	
	<b>Sample Port on the Discharge Line of the Final pH Adjustment Tank</b>		<b>Sample Port on the Discharge Line of the Oil/Water Separator in the Mechanical Room</b>	
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>	<b>Grab Sample</b>	<b>Parameters</b>
January				
February	X	Cu, Ag		
March				
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN		
May				
June	X	Cu, Ag		
July				
August	X	Cu, Ag		
September				
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN	X	Total Oil and Grease (fats, oils, and grease)
November				
December	X	Cu, Ag		

**Legend**

Cd - Cadmium  
Cr - Chromium  
Cu - Copper  
CN - Cyanide  
Pb - Lead  
Ni - Nickel  
Ag - Silver  
Zn - Zinc

O&G - Total Oil and Grease (fats, oils, and grease)

**Attachment A**

**Tiffany and Company**  
**Basis for EPA Discharge Limitations**

**Production Based Standards**

Subpart D PSNS for Surface Treatment Rinse		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.21	0.093
Copper	1.17	0.616
Cyanide	0.179	0.074
Silver	0.253	0.105

Subpart D PSNS for Shot Casing Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.125	0.055
Copper	0.698	0.367
Cyanide	0.107	0.044
Silver	0.151	0.0631

Subpart D PSNS for Heat Treatment Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.142	0.063
Copper	0.793	0.417
Cyanide	0.0121	0.050
Silver	0.171	0.071

**Attachment A**  
**(continued)**

**Tiffany and Company**  
**Basis for EPA Discharge Limitations**

**Combined Wastestream Formula (CWF)**

**Alternative Mass Limit Formula**

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

$M_{cwf}$  = alternate mass limit for pollutant

$M_i$  = categorical pretreatment standard mass limit for pollutant in stream i

$F_i$  = average daily flow of stream i (minimum 30 day average)

$F_d$  = average daily flow of dilute wastestream (minimum 30 day average)

$F_t$  = average daily flow through the combined treatment facility (minimum 30 day average)

**Conversion to mg/l ( $C_{mg/l}$ )**

$$C_{mg/l} = M_{cwf} / F$$

$F$  = Average monthly flow through this combined treatment facility

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED NON-FERROUS PRECIOUS METAL FORMING WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Tiffany and Company

300 Maple Ridge Drive

Cumberland, RI 02964

**PERMIT NUMBER:** B1506-018-0428

**PERMIT EXPIRATION DATE:** 04/30/2028

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 25, 2023

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL LANDFILL OPERATIONS  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3112-002-1029

Company Name: **RHODE ISLAND RESOURCE RECOVERY CORPORATION**

Facility Address: 65 Shun Pike, Johnston, RI 02919

Mailing Address: 65 Shun Pike, Johnston, RI 02919

Facility Executive Director: Mr. Lou Vergato

Facility Authorized Agents: Mr. Lou Vergato, Mr. Peter J. Connell, Ms. Inga Lermontov-Hoit,  
Mr. Kipp Allen

User Classification: Landfill Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Lou Vergato**, in his capacity as Executive Director of Rhode Island Resource Recovery Corporation, **and Rhode Island Resource Recovery Corporation**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 16 pages with conditions A – T.

**This permit becomes effective on November 1, 2024  
and expires on October 31, 2029.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

October 15, 2024  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee shall not discharge more than 650,000 gallons per day. The permittee shall not exceed a maximum discharge flow rate of 38,000 gallons per hour. The daily average flow rate shall not exceed 27,000 gallons per hour. The permittee agrees not to exceed the specified maximum daily and hourly flow restrictions and must notify the NBC in advance of any exceedances of the aforementioned flow rates.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Landfill Leachate;
  - b. Treated Discharges from the OU1/Phase 1 Site;
  - c. Gas Line Condensate;
  - d. Oil/Water Separator Discharges.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Electroplating Solutions;
  - b. Cyanide Solutions;
  - c. Acidic Solutions with a pH less than 5.0 standard units;
  - d. Caustic Solutions with a pH greater than 11.0 standard units;
  - e. Degreasing Solutions;
  - f. Solvents;
  - g. Sludges;
  - h. Fuel and Lubricating Oils;
  - i. Gasoline;
  - j. Benzene;
  - k. Radioactive Wastes;
  - l. Hazardous Wastes;
  - m. Trucked or Hauled Waste of any Type.
2. The permittee is strictly prohibited from accepting wastewater from the combustion condensate and gas conditioning and compression operations conducted by Rhode Island LFG Genco, LLC without receiving written approval from the NBC. The valve in Manhole Number 5 must remain locked out at all times.
3. The permittee is strictly prohibited from accepting and treating wastewater from any other source or business through the SBR pretreatment system without first obtaining written approval from the NBC on any such discharge.
4. New or existing companies located on Rhode Island Resource Recovery Corporation property are strictly prohibited from connecting to the NBC sewer system without obtaining a NBC Sewer Connection Permit or discharging to the NBC system via the Rhode Island Resource Recovery Corporation discharge system without prior NBC approval.
5. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or waste streams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
6. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals, or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
7. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

## **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of three (3) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final equalization tank, collecting all process discharges specified in Section B(1) (a and b) of this permit.

Sample Location #2 - Sampling tee in the oil/water separator located near the SBR Administration Building, collecting all process discharges specified in Section B(1)(d) of this permit.

Sample Location #3 - Sampling tee in the oil/water separator located near the Maintenance Garage, collecting all process discharges specified in Section B(1)(d) of this permit.

The permittee is prohibited from discharging dilution waste streams into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1, #2 and #3 must be in compliance with the effluent limitations specified in Section A, Table 1 of this permit.

2. The permittee shall operate and maintain the pretreatment systems in conformance with plans approved by the NBC. The pretreatment systems shall be fully operational whenever process discharges to the sewer occur.
3. The permittee shall add a carbon source to the SBR pretreatment system throughout April of each year to accelerate biological nutrient removal processes and shall operate the system to the fullest extent necessary to achieve and maintain compliance with the discharge limitations for nitrogen compounds specified in Table 1 of this permit.
4. The permittee has installed a Proline Promag L 400 electro-magnetic meter on the discharge line of the SBR pretreatment system. This magnetic water meter will be used for NBC billing purposes and is prohibited from being reset by Rhode Island Resource Recovery Corporation. The meter must be equipped with magnetic strips and the casing must be fitted with a lock to ensure the meter will not be reset. The key for the magnetic meter must be given solely to the NBC Customer Service Section. The Proline Promag L 400 electro-magnetic meter must be inspected on a monthly basis, cleaned accordingly, and calibrated quarterly until the expiration date of this permit. A meter reading from the last day of each month is to be submitted to the NBC Customer Service Section on the first day of the following month.

- The permittee is responsible for properly operating and maintaining the pretreatment systems to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

**E. Monitoring Requirements:**

- The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The permittee shall record the volume of landfill leachate discharged to the NBC sewer system on a daily basis on the pH Monitoring Report. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
- The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December, until the expiration date of this permit. The monthly samples must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

*Metals:*

Arsenic (Total)	Copper (Total)	Nickel (Total)
Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Mercury (Total)	Zinc (Total)

*Nitrogen Parameters:*

Ammonia (Total)  
Total Nitrogen

*Other Parameters:*

Cyanide  
Total Oil & Grease (fats, oils, and grease)  
Total Toxic Organics (TTO)  
Biochemical Oxygen Demand (BOD)  
Total Suspended Solids (TSS)

Table 2 attached hereto summarizes the sampling requirements for this facility.

- The discharge meter measuring flows from the SBR pretreatment system is to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.

4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
5. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
6. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in wastewater flows;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment systems including, but not limited to, the following:
  - a. All results from samples analyzed in the in-house laboratory;
  - b. Amount of chemicals used on a monthly basis to provide pretreatment;
  - c. Amount of sludge generated on a monthly basis;
  - d. Completed manifest forms for hazardous materials;
  - e. Maintenance performed on the pretreatment systems including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC;
  - f. Quarterly calibrations, cleaning and daily meter readings from the Proline Promag L 400 electro-magnetic meter referenced in Section D(4) of this permit.

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

### **G. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

### **H. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure;
- f. Cell liner failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

## **I. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**J. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

**M. Permit Violations:**

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

## **O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;

- d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
- e. Violation of any terms or conditions of the permit;
- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

\* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

\*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Rhode Island Resource Recovery Corporation**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sample Port on the Discharge Line of the Final Equalization Tank</b>		
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>
January	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
February	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
March	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
April	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
May	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
June	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
July	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
August	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
September	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
October	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
November	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
December	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN

**Legend**

As - Arsenic	Pb - Lead	O&G - Total Oil and Grease (fats, oils, and grease)
Cd - Cadmium	Hg - Mercury	BOD - Biochemical Oxygen Demand
Cr - Chromium	Ni - Nickel	TSS - Total Suspended Solids
Cu - Copper	Ag - Silver (Total)	TTO - Total Toxic Organic Compounds
CN - Cyanide	Zn - Zinc (Total)	TN - Total Nitrogen

\*Cyanide and Total Oil & Grease samples are to be collected as four grab samples over the course of the day.

# CERTIFICATE TO DISCHARGE

the following types of process water:

**LAND FILL LEACHATE DISCHARGES**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Rhode Island Resource Recovery Corporation

65 Shun Pike

Johnston, RI 02919

**PERMIT NUMBER:** P3112-002-1029

**PERMIT EXPIRATION DATE:** 10/31/2029

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

October 15, 2024  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL AEROGEL MANUFACTURING  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B3206-002-0426

Company Name: **ASPEN AEROGELS RHODE ISLAND, LLC**

Facility Address: 3 Dexter Road, East Providence, RI 02914

Mailing Address: 3 Dexter Road, East Providence, RI 02914

Facility President: Mr. Donald R. Young

Facility Authorized Agents: Mr. Matthew Milliken, Ms. Thalia Valkanos

User Classification: Aerogel Manufacturing with High Conventional Pollutant Loads

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Donald R. Young and Aspen Aerogels Rhode Island, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 21 pages with conditions A - V.

**This permit becomes effective upon receipt  
and expires on April 30, 2026.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission**:

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

August 25, 2022  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 20, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts aerogel manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 32 specified in Table 1 on page 19, attached hereto and incorporated herein. The Ammonia and Total Nitrogen limits will be enforced from May 1st through October 31st. These limits are in pounds per day and apply to the entire facility.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of aerogel manufacturing wastewater is greater than or equal to 50,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:

- a. Treated Scrubber Blowdown;
  - b. Extractor Wash Water;
  - c. Coating Line Equipment Wash Water;
  - d. Water Jet Machine Wastewater;
  - e. Cooling Tower Purge;
  - f. Plunger CO<sub>2</sub> Pump Water;
  - g. Air Compressor Condensate;
  - h. AFTF Catalyst Process Wastewater.
2. The permittee may batch discharge the entire contents of the cooling towers, boilers, and chillers after receiving approval from the NBC. In order to receive approval, the permittee must sample the contents in accordance with Sections E(6, 7, and 8) of this permit.
  3. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Raw Materials;
  - b. Off Specification Materials;
  - c. Sol Prep Solutions;
  - d. Casting Solutions;
  - e. Aging Fluid;
  - f. Solids greater than 1/2 inch in diameter;
  - g. Acidic Solutions with a pH less than 5.0 standard units;
  - h. Caustic Solutions with a pH greater than 11.0 standard units;
  - i. Degreasing Solutions;
  - j. Solvents;
  - k. Sludges;
  - l. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from batch discharging the entire contents of the cooling towers, boilers, and chillers without first receiving approval prior to discharge. In order to receive approval, the contents of the cooling towers, boilers, and chillers must be sampled in accordance with Section E(6 through 8) of this permit.
3. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 20, attached hereto and incorporated herein.

4. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
5. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of ten (10) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - pH Adjustment Tank, collecting all process discharges specified in Section B(1)(a) of this permit.

Sample Location #2 - Sample port downstream of Clean In Place Tank and AFTF Catalyst Process discharge line, collecting all process discharges specified in Section B(1)(b and h) of this permit.

Sample Location #3 - Sample port on the discharge line of the Coating Line Wastewater Sump Tank and Water Jet Machine #2, collecting all process discharges specified in Section B(1)(c and d) of this permit.

Sample Location #4 - Sample port on the Buildings 1 and 2 Cooling Towers discharge line, collecting all process discharges specified in Sections B(1) (e and f) and B(2) of this permit.

Sample Location #5 - Sample port on the Building 3 Cooling Tower discharge line, collecting all process discharges specified in Section B(1) (e and f) and B(2) of this permit.

Sample Location #6 - Sample port on the Buildings 1 and 2 Boiler discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #7 - Sample port on the Building 3 Boiler discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #8 - Sample port on the Buildings 1 and 2 Chiller discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #9 - Sample port on the Building 3 Chiller discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #10 - Sample port on the discharge line of water jet machine #1, collecting all process discharges specified in Section B(1)(d) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1, #2, #3, #4, #5, #6, #7, #8, #9, and #10 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than 1/2 inch are not discharged to the sewer system.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

#### **E. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge through Sample Location #1 and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.

2. The permittee shall conduct sampling over one (1) full normal operating day during the months of February, April, June, August, October, and December until the expiration date of this permit.

- a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the pH Adjustment Tank, Sample Location #1. The composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameter:

Biochemical Oxygen Demand (BOD)

During the months of June, August, and October, a portion of the composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia  
Total Nitrogen

- b. On the same day that the composite sample listed in Section E(2)(a) above is being collected, the permittee shall collect four (4) grab samples from the pH Adjustment Tank, Sample Location #1, at equidistant time periods the operating days (i.e., one (1) sample every two (2) hours over the operating day). Each grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. Each grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. Each grab sample is to be analyzed separately and the mathematical average reported. Alternatively, the grab samples may be composited in the laboratory at a temperature of 0 - 4°C immediately before analysis. All samples must be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.

- c. On the same day that the composite sample listed in Section E(2)(a) above is being collected, the permittee shall collect a composite sample consisting of a minimum of twelve (12) equal volume grab samples collected at least every half hour over the course of the operating day or collected continuously with a composite sampler. The samples are to be collected from the pH Adjustment Tank, Sample Location #1. A minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. Each grab sample must be preserved immediately upon sample collection according to EPA regulations prior to compositing with other preserved grab samples. If an automatic composite sampler is used, it must be as free as possible of plastic tubing and other potential sources of contamination; if the sampler includes a peristaltic pump, use a minimum length of properly cleaned silicone rubber tubing; the sampler must utilize glass sample containers; the samples must be refrigerated to a temperature of 0 - 4°C during sample collection; and they must be immediately preserved once the sample collection process is completed. The samples must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis. All samples must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.

3. During the months of February, April, June, August, October and December until the expiration date of this permit, the permittee shall conduct sampling from the sample port downstream of the Clean In Place Tank and AFTF Catalyst Process discharge line, Sample Location #2, while a batch discharge is occurring, three grab samples must be collected as follows:

- a. A grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)  
Total Suspended Solids

During the months of June, August, and October, a portion of the composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia  
Total Nitrogen

- b. A grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.
    - c. A grab sample consisting of a minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units, and the sample must be stored in the dark and refrigerated at a temperature of 0 - 4°C, until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
  4. During the months of February, June, and October, until the expiration date of this permit, the permittee shall conduct sampling from the sample port on the discharge line of the Coating Line Wastewater Sump Tank and Water Jet Machine #2, Sample Location #3, while batch discharge is occurring. Three (3) grab samples must be collected as follows:
    - a. A grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)  
Total Suspended Solids

- b. A grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.
  - c. A grab sample consisting of a minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units, and the sample must be stored in the dark and refrigerated at a temperature of 0 - 4°C, until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
5. During the months of April, August, and October, until the expiration date of this permit, the permittee shall collect a grab sample from the sample port on the discharge line of the water jet machine, Sample Location #10. The grab sample is to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)  
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

- 6. Prior to obtaining approval to discharge the contents of any cooling tower, a grab sample of the cooling tower wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the cooling tower. The permittee may only discharge the contents of the cooling tower once approval is received from the NBC.

7. Prior to obtaining approval to discharge the contents of any boiler, a grab sample of the boiler wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the boiler. The permittee may only discharge the contents of the boiler once approval is received from the NBC.

8. Prior to obtaining approval to discharge the contents of any chiller, a grab sample of the chiller wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the chiller. The permittee may only discharge the contents of the chiller once approval is received from the NBC.

9. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
10. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.

11. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
12. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Completed manifest forms for hazardous materials;
  - c. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
  - d. The amount of chemicals added to provide pretreatment of batch discharges;
  - e. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

## **H. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

## **I. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

## **J. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**K. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**L. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Aspen Aerogels Rhode Island, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Aspen Aerogels Rhode Island, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Aspen Aerogels Rhode Island, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Aspen Aerogels Rhode Island, LLC shall be subject to the terms and conditions of the permit as if named herein.

**M. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**N. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **O. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **P. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

#### **Q. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

#### **R. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **S. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **T. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

#### **U. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

#### **V. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:NJD:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic(Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Aspen Aerogels Rhode Island, LLC**  
**Sampling Requirements**

Month	Sample Location #1 pH Adjustment Tank		Sample Location #2 Sample Port Downstream of the Clean In Place Tank and AFTF Catalyst Process Discharge Line		Sample Location #3 Sample Port on the Discharge Line of the Coating Line and Water Jet Machine #2 Wastewater		Sample Location #4 Sample Port on the Discharge Line of the Water Jet Machine	
	Composite Sample	Parameters	Grab Sample	Parameters	Grab Sample	Parameters	Grab Sample	Parameters
January								
February	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT	X	BOD, TSS, VOC, EXT		
March								
April	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT			X	BOD, TSS
May								
June	X	BOD, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT		
July								
August	X	BOD, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT, TN, NH <sub>3</sub>			X	BOD, TSS
September								
October	X	BOD, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT		
November								
December	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT			X	BOD, TSS

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

VOC - Volatile Organic compounds Portion of TTO List

EXT - Extractable Portion of TTO List

TN – Total Nitrogen

NH<sub>3</sub> – Ammonia

# CERTIFICATE TO DISCHARGE

the following types of process water:

**AEROGEL MANUFACTURING WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Aspen Aerogels Rhode Island, LLC

3 Dexter Road

East Providence, RI 02914

**PERMIT NUMBER:** B3206-002-0426

**PERMIT EXPIRATION DATE:** 04/30/2026

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

August 25, 2022  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL WHOLESALE FOOD  
PROCESSING OPERATIONS WITH  
HIGH CONVENTIONAL  
POLLUTANT LOADS WASTEWATER  
DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B3302-010-0430  
Company Name: **CALISE & SONS BAKERY, INC.**  
Facility Address: 2 Quality Drive, Lincoln, RI 02865  
Mailing Address: 2 Quality Drive, Lincoln, RI 02865  
Facility President: Mr. Michael R. Calise  
Facility Authorized Agent: Mr. Robert Lupo  
User Classification: Wholesale Bakery Operations  
Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Michael R. Calise and Calise & Sons Bakery, Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - T.

**This permit becomes effective on May 1, 2025  
and expires on April 30, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

April 25, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts food processing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 33 specified in Table 1 on page 14, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of food processing wastewater is greater than or equal to 1,000 gallons, but less than 10,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following waste, solutions, or process wastewater streams to the NBC facilities:
  - a. Bakery Process Wastewater;
  - b. Equipment Wash Water;
  - c. Process Area Floor Wash Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Solids greater than ½ inch in diameter;
  - b. Waste associated with grease interceptor pump-outs;
  - c. Fryolator/Cooking Oils and Grease;
  - d. Degreasing Solutions;
  - e. Solvents;
  - f. Sludges;
  - g. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1, attached hereto and incorporated herein.
3. The permittee is prohibited from discharging any solutions or chemicals which might interfere with the proper operation of the outdoor in-ground grease removal unit or may cause a violation of the Rules and Regulations.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sampling tee in the final compartment of the outdoor in-ground grease removal unit, collecting all process discharges specified in Section B(1)(a, b, and c) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through the sample location must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit at all times.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than ½ inch are not discharged to the sewer system.
4. The permittee shall maintain pretreatment measures in conformance with plans approved by the NBC. All pretreatment measures shall be fully implemented whenever process discharges to the sewer occur. Pretreatment measures include the following:
  - a. The permittee must conduct weekly inspections of the outdoor in-ground grease removal unit to determine the amount of grease collected in the unit. The grease removal unit must be maintained according to manufacturer's specifications at all times. The permittee is required to have the grease pumped out of the unit before such grease discharges to the NBC sewer system and must be pumped out immediately upon grease being observed in the final discharge tee;
  - b. The outdoor in-ground grease removal unit must be pumped out at least once each year. The NBC may require more frequent cleaning of the grease removal unit based on inspections and sampling performed by NBC personnel;
  - c. Receipt(s) for cleaning the outdoor in-ground grease removal unit, including an indication of the final disposal site, must be submitted to the NBC. These receipts must be received by June 30<sup>th</sup> of each year;
  - d. Only food processing wastewater may be discharged into the outdoor in-ground grease removal unit. Sanitary wastes and sanitary wastewater lines may not discharge to the grease removal unit. Dishwasher wastewater may not discharge into the outdoor in-ground grease removal unit;
  - e. The permittee is prohibited from discharging any solution(s) or chemical(s) which might interfere with the proper operation of the outdoor in-ground grease removal unit or may cause a violation of the Rules and Regulations;
  - f. An outdoor in-ground grease removal unit logbook must be maintained at the permittee's facility. The logbook must include such information as outlined under Section F, Record Keeping Requirements. The logbook must be kept on the premises at all times and available to NBC personnel for their review.
5. The permittee must install additional grease removal equipment that conforms with Section 1.8.8 of the Rules and Regulations if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction, should installation of additional grease removal system be required.

## **E. Monitoring Requirements:**

1. During the months of April and October, until the expiration date of this permit, the permittee must collect two (2) grab samples from the sample tee in the final compartment of the outdoor in-ground grease removal unit, Sample Location #1. The first grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

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

The second grab sample is to be collected in a glass bottle, preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

During the month of October, the permittee must collect a third grab sample. This grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia  
Total Nitrogen

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
3. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
4. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.

5. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **F. Record Keeping Requirements:**

1. The permittee must inspect and maintain the outdoor in-ground grease removal unit at least once per week and record in a logbook the time and date of the inspection (month, day, and year), each grease removal activity, and the name of the individual conducting the activity. Maintenance activities which must be documented in a logbook include the following:
  - a. The thickness of the grease layer must be recorded in the logbook. The grease removal unit must be maintained according to manufacturer's specifications and pumped out accordingly. If grease is observed in the final discharge pipe, the grease removal unit must be pumped out immediately;
  - b. All pump-outs are to be recorded, listing the firm that performed the pump-out, estimated gallons pumped, and the date and time when the pumping occurred;
  - c. Physical receipts for each pump-out are to be kept with the permittee's logbook. These receipts must be kept for a period of three (3) years and must be made available to NBC inspectors.
  - d. Nature of any maintenance and correctible measures required to maintain proper performance of the in-ground grease removal unit;
  - e. Completed manifest or physical receipts for waste materials removed from the facility.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system. Operational changes that may affect the quality or quantity of the process wastestream include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

#### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

#### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

#### **J. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Calise & Sons Bakery, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Calise & Sons Bakery, Inc. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Calise & Sons Bakery, Inc. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Calise & Sons Bakery, Inc. shall be subject to the terms and conditions of the permit as if named herein.

#### **K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

## **L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **M. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

## **O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.

2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

### **Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

### **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;

- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

JU:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Mass-Based Limits Worksheet
- Logsheet for Outdoor In-Ground Grease Removal Unit
- Grease Interceptor Pump-Out Verification Report Form

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Calise & Sons Bakery, Inc.**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sample Tee in the Final Compartment of the Outdoor In-Ground Grease Removal Unit</b>		
<b>Month</b>	<b>Grab Sample</b>	<b>Parameters</b>
January		
February		
March		
April	X	BOD, TSS, O&G
May		
June		
July		
August		
September		
October	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
November		
December		

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

O&G - Total Oil and Grease (fats, oils, and grease)

NH<sub>3</sub> - Ammonia

TN - Total Nitrogen

# CERTIFICATE TO DISCHARGE

the following types of process water:

**BAKERY PROCESSING WASTEWATER, EQUIPMENT AND PROCESS AREA WASH WATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Calise & Sons Bakery, Inc.

2 Quality Drive

Lincoln, RI 02865

**PERMIT NUMBER:** B3302-010-0430

**PERMIT EXPIRATION DATE:** 04/30/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 25, 2025

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL BEVERAGE MANUFACTURING  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B3402-036-0330

Company Name: **FULLY ROOTED INC.**

Facility Address: 560 Mineral Spring Avenue, Unit 5-100, Pawtucket, RI 02860

Mailing Address: 1306A Hill Farm Road, Coventry, RI 02816

Facility President: Mr. Angelo Mollis

Facility Authorized Agents: Mr. Angelo Mollis, Ms. Amanda Repose

User Classification: Beverage Manufacturing Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Angelo Mollis and Fully Rooted Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 14 pages with conditions A - T.

**This permit becomes effective upon receipt  
and expires on March 31, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

April 15, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts beverage manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Biochemical Oxygen Demand and Total Suspended Solids limitations for Category 34 specified in Table 1 on page 13, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of beverage manufacturing wastewater is less than 2,500 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Fermenting Vessel Wash Water;
  - b. Keg Wash Water;
  - c. Juicing Equipment Wash Water;
  - d. Bottling Line Wash Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Waste Kombucha and Off-Specification Product;
  - b. Spent Produce used in Preparation;
  - c. Symbiotic Culture of Bacteria and Yeast;
  - d. Raw Juice;
  - e. Solids greater than ½ inch in diameter;
  - f. Acidic Solutions with a pH less than 5.0 standard units;
  - g. Caustic Solutions with a pH greater than 11.0 standard units;
  - h. Degreasing Solutions;
  - i. Solvents;
  - j. Sludges;
  - k. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:
  - Sample Location #1 - Sample port on the discharge line of the three-bay sink, collecting all process discharges specified in Section B(1) (a, b, and c) of this permit.
  - Sample Location #2 - Sample port on the discharge line of the clean-in place system, collecting all process discharges specified in Section B(1)(d) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling locations. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall provide pretreatment of the process wastewater discharges listed in Section B(1) above if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction.
3. The permittee must ensure that all drains of the three-bay sink are equipped with screens, filters, or some other solids retention device to ensure that solids larger than ½ inch are not discharged to the sewer system.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

#### **E. Monitoring Requirements:**

1. During the months of June and December, until the expiration date of this permit, the permittee must collect one (1) grab sample from the sample port on the discharge line of the three-bay sink, Sample Location #1. The grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand  
Total Suspended Solids

2. The permittee shall conduct sampling over one (1) full normal operating day during the months of June and December, until the expiration date of this permit. A composite sample must be collected from the sample port on the discharge line of the clean-in-place system, Sample Location #2, and consist of equal volume grab samples collected from each batch discharge of the clean-in-place system. The composite samples collected in June and December are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand  
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

3. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
5. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
6. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the clean-in-place system including, but not limited to, the following:

Date, Volume, and pH of each batch discharge

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the

NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
  - g. Change in the personnel responsible for the proper operation of pretreatment equipment.
3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

#### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

#### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

#### **J. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Fully Rooted Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Fully Rooted Inc. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Fully Rooted Inc. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Fully Rooted Inc. shall be subject to the terms and conditions of the permit as if named herein.

**K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

**M. Permit Violations:**

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

### **N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

### **O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

**P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

**Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

**R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;

- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

AT:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Mass-Based Limits Worksheet

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Fully Rooted Inc.**  
**Sampling Requirements**

Month	Sample Location #1 Sample Port on the Discharge Line of the Three-Bay Sink		Sample Location #2 Sample Port on the Discharge Line of the Clean-In-Place System	
	Grab Sample	Parameters	Composite Sample	Parameters
January				
February				
March				
April				
May				
June	X	BOD, TSS	X	BOD, TSS
July				
August				
September				
October				
November				
December	X	BOD, TSS	X	BOD, TSS

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

# CERTIFICATE TO DISCHARGE

the following types of process water:

**BEVERAGE MANUFACTURING WASTEWATER**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Fully Rooted Inc.

560 Mineral Spring Avenue Unit 5-100

Pawtucket, RI 02860

**PERMIT NUMBER:** B3402-036-0330

**PERMIT EXPIRATION DATE:** 03/31/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 15, 2025  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL BREWERY  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B3602-013-0130

Company Name: **CAVE, LLC D/B/A WHITE DOG DISTILLING**

Facility Address: 560 Mineral Spring Avenue, Unit 2-116, Pawtucket, RI 02860

Mailing Address: 560 Mineral Spring Avenue, Unit 2-116, Pawtucket, RI 02860

Facility President: Mr. Carlo Catucci

Facility Authorized Agent: Mr. Carlo Catucci

User Classification: Distilling Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Carlo Catucci and Cave, LLC d/b/a White Dog Distilling**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - T.

**This permit becomes effective on February 1, 2025  
and expires on January 31, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission**:

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

January 28, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts distilling operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Biochemical Oxygen Demand and Total Suspended Solids limitations for Category 36 specified in Table 1 on page 14, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of distilling wastewater is less than 5,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Still Wash Water;
  - b. Fermenter Wash Water;
  - c. Mash Tun Wash Water;
  - d. Glassware Wash Water;
  - e. Non-contact Cooling Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Concentrated Distilled Alcohols;
  - b. Off-Specification Product;
  - c. Fermented Mash;
  - d. Spent Grains and Botanicals;
  - e. Tank Heels/Bottoms;
  - f. Solids greater than 1/2 inch in diameter;
  - g. Acidic Solutions with a pH less than 5.0 standard units;
  - h. Caustic Solutions with a pH greater than 11.0 standard units;
  - i. Degreasing Solutions;
  - j. Solvents;
  - k. Sludges;
  - l. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1)(a, b, and c) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the 30-gallon batch discharge tank, collecting all process discharges specified in Section B(1)(a, b, and c) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall provide pretreatment of the process wastewater discharges listed in Section B(1) above if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than 1/2 inch are not discharged to the sewer system.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

**E. Monitoring Requirements:**

1. The permittee shall conduct sampling over one (1) full normal operating day during the months of April and October, until the expiration date of this permit. A composite sample must be collected from the sample port on the discharge line of the 30-gallon batch discharge tank, Sample Location #1, and consist of equal volume grab samples collected from each batch discharge of the 30-gallon batch discharge tank. The composite samples collected in April and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand  
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.

3. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
4. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
5. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Date, volume, and pH of each batch discharge;
  - b. The amount of chemicals added to provide pretreatment of batch discharges;
  - c. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
  - g. Change in the personnel responsible for the proper operation of pretreatment equipment.
3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

#### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

#### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**J. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Cave, LLC d/b/a White Dog Distilling shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Cave, LLC d/b/a White Dog Distilling has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Cave, LLC d/b/a White Dog Distilling is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Cave, LLC d/b/a White Dog Distilling shall be subject to the terms and conditions of the permit as if named herein.

**K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

**M. Permit Violations:**

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

**O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

**P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

**Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

KCG:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Mass-Based Limits Worksheet

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Cave, LLC d/b/a White Dog Distilling**  
**Sampling Requirements**

	<b>Sample Location #1</b> <b>Sample Port on the Discharge Line of the</b> <b>30-Gallon Batch Discharge Tank</b>	
<b>Month</b>	<b>Composite Sample*</b>	<b>Parameters</b>
January		
February		
March		
April	X	BOD, TSS
May		
June		
July		
August		
September		
October	X	BOD, TSS
November		
December		

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

\*Composite samples must consist of equal volume grab samples collected from each discharge of the 30-gallon batch discharge tank over the course of the operating day.

# CERTIFICATE TO DISCHARGE

the following types of process water:

**DISTILLING OPERATIONS WASTEWATER**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Cave, LLC d/b/a White Dog Distilling

560 Mineral Spring Avenue, Unit 2-116

Pawtucket, RI 02860

**PERMIT NUMBER:** B3602-013-0130

**PERMIT EXPIRATION DATE:** 01/31/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

January 28, 2025  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL AUTOMOTIVE  
FLEET WASHING  
WASTEWATER DISCHARGE  
PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3704-085-0630

Company Name: **RHODE ISLAND PUBLIC TRANSIT AUTHORITY**

Permitted Facility: **705 Elmwood**

Facility Address: 705 Elmwood Avenue, Providence, RI 02907

Mailing Address: 705 Elmwood Avenue, Providence, RI 02907

Facility Director: Mr. Peter Alviti

Facility Authorized Agent: Mr. Peter Ginaitt

User Classification: Fleet Maintenance Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations) **Mr. Peter Alviti and Rhode Island Public Transit Authority**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 14 pages with conditions A - S.

**This permit becomes effective on July 1, 2025  
and expires on June 30, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

June 25, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Vehicle Repair Wastewater;
  - b. Treated Parts Washing Wastewater;
  - c. Treated Vehicle Wash Water and Rinsewater;
  - d. Treated Vehicle Run-off Wastewater.
2. No other process wastewater, chemicals, or solutions are to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances as detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Oils and Greases;
  - b. Solvents;
  - c. Sludges;
  - d. Solids/Grit;

- e. Antifreeze Solutions;
  - f. Degreasing Solutions;
  - g. Caustic Solutions with a pH greater than 11.0 standard units;
  - h. Acidic Solutions with a pH less than 5.0 standard units.
2. The permittee is strictly prohibited from discharging wastewater containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
  3. The permittee may only treat and/or discharge those solutions that are specified in Section B(1) of this permit. The permittee is strictly prohibited from discharging any other solutions, chemicals or materials including all prohibited substances as defined in the Rules and Regulations without written approval from the NBC.
  4. No tanks are to be discharged to the sewer unless specifically approved by the NBC in writing.
  5. The use of portable pumps and/or flexible hose for transfer of chemicals or wastewater is specifically prohibited without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must ensure that all vehicle wash water, rinsewater, run-off water, and parts wash water discharges to a solids/grit removal chamber or some other solids retention device to ensure that solids such as sand and grit are not discharged to the sewer system.
2. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - The effluent sampling tee in the oil and solids/grit separating tank, collecting wastestreams referenced in Section B(1) (a through d) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through each sample location must be in compliance with the effluent limitations specified in Table 1 of this permit.

3. The permittee has installed and must operate and maintain the oil and solids/grit removal system. This oil and solids/grit removal system shall be fully operational whenever process discharges to the sewer system occur.

4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

**E. Monitoring Requirements:**

1. During the months of January, April, July, and October, until the expiration date of the permit, the permittee shall collect two (2) grab samples from the effluent sampling tee in the oil and solids/grit separating tank, Sample Location #1, while normal process discharges are occurring from the separator. The first grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)      Lead (Total)      Zinc (Total)  
    Nickel (Total)

The second grab sample must be collected in a glass bottle, preserved, and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These readings and the resultant total flow are to be submitted with the sampling results.
3. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and must certify that the information submitted is accurate and complete to the best of their knowledge.
4. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.

5. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the oil and solids/grit removal system including, but not limited to, the following:
  - a. Date on which the separator is inspected, cleaned, and by whom;
  - b. Nature of any maintenance and corrective measures required to maintain proper performance of the separator and other maintenance requests specified by inspectors of the NBC;
  - c. Completed manifests or physical receipts for waste materials removed from the facility.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

#### **G. Emergency/Routine Notification Requirements:**

1. The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

## 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

## 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

### Oil and Solids/Grit Separation System Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

**H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**J. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**K. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

**L. Permit Violations:**

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**M. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

**N. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

**O. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

**P. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **Q. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

**R. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

**S. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

THC:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

\* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

\*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Rhode Island Public Transit Authority – 705 Elmwood  
Sampling Requirements**

<b>Sample Location #1</b>		
<b>Effluent Sampling Tee in the Oil and Solids/Grit Separating Tank</b>		
<b>Month</b>	<b>Grab Sample</b>	<b>Parameters</b>
January	X	Cu, Pb, Ni, Zn, O&G
February		
March		
April	X	Cu, Pb, Ni, Zn, O&G
May		
June		
July	X	Cu, Pb, Ni, Zn, O&G
August		
September		
October	X	Cu, Pb, Ni, Zn, O&G
November		
December		

**Legend**

Cd - Cadmium                      O&G - Total Oil and Grease (fats, oils, and grease)  
Cr - Chromium  
Cu - Copper  
CN - Cyanide  
Pb - Lead  
Ni - Nickel  
Ag - Silver  
Zn - Zinc

# CERTIFICATE TO DISCHARGE

the following types of process water:

**VEHICLE WASH WATER AND RinSEWATER,  
PARTS CLEANING WASTEWATER, AND VEHICLE RUN-OFF WASTEWATER**

---

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Rhode Island Public Transit Authority – 705 Elmwood

705 Elmwood Avenue

Providence, RI 02907

**PERMIT NUMBER:** P3704-085-0630

**PERMIT EXPIRATION DATE:** 06/30/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

June 25, 2025

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***ANAEROBIC DIGESTOR  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3812-003-0927

Company Name: **RHODE ISLAND BIOENERGY, LLC**

Facility Address: 289 Scituate Avenue, Johnston, RI 02919

Mailing Address: c/o Anaergia Services, LLC 705 Palomar Airport Road,  
Suite 200, Carlsbad, CA 92011

Facility Chief Executive Officer: Mr. Andrew Benedek

Facility Authorized Agents: Mr. Kevin Bell, Mr. Alex McFarlane

User Classification: Anaerobic Food Digestion Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Andrew Benedek and Rhode Island Bioenergy, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 16 pages with conditions A - V.

**This permit becomes effective upon receipt  
and expires on September 30, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

October 12, 2022  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

# CONDITIONS TO PERMIT

## **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee shall not discharge more than 148,000 gallons per day of food waste digestate and gas scrubber wastewater. The permittee must notify the NBC within twenty-four (24) hours if the daily flow restriction is exceeded.

## **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Food Waste Digestate;
  - b. Treated Condensate from Biogas Washing Scrubbers.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

## **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Solids larger than 1/2 inch in size;
  - b. Concentrated/Untreated Food Waste;

- c. Acidic Solutions with a pH less than 5.0 standard units;
  - d. Caustic Solutions with a pH greater than 11.0 standard units;
  - e. Degreasing Solutions;
  - f. Solvents;
  - g. Sludges;
  - h. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
  3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
  4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line from the MBR system, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.

3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

### **E. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall monitor the quantity of treated wastewater discharged to the NBC sewer system and record the total daily flow from the turbine water meter. The permittee shall report the daily flow in a summary report which must be received by the NBC within thirty (30) days from the end of the month in which the flow was recorded. The turbine meter must be inspected at a minimum of one (1) time per year and calibrated as needed.
3. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December until the expiration date of this permit from the sample port on the discharge line from the MBR system, Sample Location #1. The monthly samples must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

*Nitrogen Parameters\*:*

Ammonia (Total)  
Total Nitrogen\*

*Other Parameters:*

Biochemical Oxygen Demand (BOD<sub>5</sub>)  
Total Suspended Solids (TSS)  
Total Oil & Grease (fats, oils, and grease)

\*The limitations for ammonia and nitrogen are seasonal and will be enforced from May 1<sup>st</sup> through October 31<sup>st</sup>. The Total Nitrogen result must be provided in total concentration (mg/L) and total loading (pounds).

Table 2 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;

- d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC;
  - e. Turbine meter inspections, maintenance, and calculations.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

### **G. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

### **H. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

### **I. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.**

## 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

## 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure;
- f. Turbine meter failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

**J. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**K. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**L. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Rhode Island Bioenergy, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Rhode Island Bioenergy, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Rhode Island Bioenergy, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Rhode Island Bioenergy, LLC shall be subject to the terms and conditions of the permit as if named herein.

## **M. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

## **N. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **O. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

### **P. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

## **Q. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **R. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **S. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **T. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;

- d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
- e. Violation of any terms or conditions of the permit;
- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **U. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **V. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:KMB:sm

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
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Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
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Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

\* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

\*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Rhode Island Bioenergy, LLC**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sample Port on the Discharge Line from the MBR System</b>		
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>
January	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
February	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
March	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
April	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
May	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
June	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
July	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
August	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
September	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
October	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
November	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
December	X	BOD, TSS, O&G, NH <sub>3</sub> , TN

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

O&G - Total Oil and Grease (fats, oils, and grease)

NH<sub>3</sub> - Ammonia

TN - Total Nitrogen

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED DIGESTATE AND GAS SCRUBBING CONDENSATE**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Rhode Island Bioenergy, LLC

289 Scituate Avenue

Johnston, RI 02919

**PERMIT NUMBER:** P3812-003-0927

**PERMIT EXPIRATION DATE:** 09/30/2027

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

October 12, 2022  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL GROUNDWATER  
REMEDICATION WASTEWATER  
DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B4012-042-0829

Company Name: **CONOPCO, INC. D/B/A UNILEVER**

Facility Address: 35A Martin Street, Cumberland, RI 02864

Mailing Address: 700 Sylvan Avenue, Englewood Cliffs, NJ 07632

Facility President: Mr. Herrish Patel

Facility Authorized Agents: Ms. Natalia Cavaliere, Ms. Kathryn Farrara, Mr. Jason Corrigan

User Classification: Groundwater Remediation Discharges

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Herrish Patel and Conopco, Inc. d/b/a Unilever**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - T.

**This permit becomes effective upon receipt  
and expires on August 31, 2029.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

May 7, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee shall not discharge greater than 215,000 gallons per calendar day of groundwater. The permittee agrees to not exceed the maximum daily flow restriction and must notify the NBC of any exceedances of the daily maximum flow rate.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Groundwater Remediation Discharges;
  - b. Treated Steam Condensate Extraction Wastewater;
  - c. Cooling Tower Blowdown;
  - d. Steam Boiler Blowdown;
  - e. Water Softener Blowdown.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Untreated Groundwater;
  - b. Acidic Solutions with a pH less than 5.0 standard units;
  - c. Caustic Solutions with a pH greater than 11.0 standard units;
  - d. Degreasing Solutions;
  - e. Solvents;
  - f. Sludges;
  - g. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port downstream of the pretreatment system, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.
4. The permittee must maintain a discharge flow meter with a mechanical, non-resettable totalizer to measure the amount of groundwater discharged. The meter must be operational at all times that discharges occur and will be utilized to assess sewer use fees based upon the volume of wastewater discharged in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq.

#### **E. Monitoring Requirements:**

1. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December until the expiration date of this permit.
  - a. A composite sample consisting of a minimum of twelve (12) equal volume grab samples shall be collected at least every half hour over the course of the operating day or shall be collected continuously with a composite sampler. The sample is to be collected from the sample port downstream of the pretreatment system, Sample Location #1. A minimum of 1,000 ml (1L) glass amber bottle with Teflon lined cap should be submitted to the laboratory for analysis. Each grab sample must be preserved immediately upon sample collection according to EPA Regulations, prior to compositing with other preserved grab samples. If an automatic composite sampler is used, the sample must be refrigerated to a temperature of 0-4°C during sample collection and must be immediately preserved once the sample collection process is completed. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis at a temperature of 0-4°C. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base and Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.

- b. On the same day that the composite sample listed in Section E(1)(a) above is being collected, four (4) grab samples are to be collected at equidistant time periods over an operating day (i.e., one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample is to be collected in a glass bottle with Teflon lined cap with a volume of either 25 or 40 ml. Each grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. Each grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4°C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. Each grab sample is to be analyzed separately and the mathematical average reported. Alternatively, the grab sample may be composited in the laboratory immediately before analysis. All samples must be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables) fraction** of the Total Toxic Organics (TTO) list enclosed.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, April, July and October until the expiration date of this permit. A composite sample is to be collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port downstream of the pretreatment system, Sample Location #1. The composite samples are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Lead (Total)	Zinc (Total)
Chromium (Total)	Nickel (Total)	Arsenic (Total)
Copper (Total)	Silver (Total)	

Table 2 attached hereto summarizes the sampling requirements for this facility.

3. The discharge flow meter referenced in Section D(4) must be read at the start of the sampling day and at the end of the sampling day. These readings and the resultant flow must be submitted with the sampling results.
4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.

5. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
6. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Completed manifest forms for hazardous materials;
  - c. Maintenance performed on the pretreatment system and other maintenance requests specified by inspectors of the NBC;
  - d. Discharge flow meter readings on a weekly basis.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. Pretreatment system pump, filter, or mixer failure;
- b. Discharge flow meter failure and/or malfunction.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

### **J. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Conopco, Inc. d/b/a Unilever shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Conopco, Inc. d/b/a Unilever has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Conopco, Inc. d/b/a Unilever is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Conopco, Inc. d/b/a Unilever shall be subject to the terms and conditions of the permit as if named herein.

#### **K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

#### **L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

#### **M. Permit Violations:**

##### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

##### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

##### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

### **N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

### **O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;

- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

THC:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Conopco, Inc. d/b/a Unilever**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sample Port Downstream of the Pretreatment System</b>		
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>
January	X	VOC, EXT, Cd, Cr, Cu, Pb, Ni, Ag, Zn, As
February	X	VOC, EXT
March	X	VOC, EXT
April	X	VOC, EXT, Cd, Cr, Cu, Pb, Ni, Ag, Zn, As
May	X	VOC, EXT
June	X	VOC, EXT
July	X	VOC, EXT, Cd, Cr, Cu, Pb, Ni, Ag, Zn, As
August	X	VOC, EXT
September	X	VOC, EXT
October	X	VOC, EXT, Cd, Cr, Cu, Pb, Ni, Ag, Zn, As
November	X	VOC, EXT
December	X	VOC, EXT

**Legend**

As – Arsenic                      TTO - Total Toxic Organic Compounds  
Cd - Cadmium                    VOC - Volatile Organic Compounds Portion of TTO List  
Cr - Chromium                  EXT - Extractable Portion of TTO List  
Cu - Copper  
Pb - Lead  
Ni - Nickel  
Ag - Silver  
Zn - Zinc

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED WASTEWATER FROM GROUNDWATER REMEDIATION OPERATIONS**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Conopco, Inc. d/b/a Unilever

35A Martin Street

Cumberland, RI 02864

**PERMIT NUMBER:** B4012-042-0829

**PERMIT EXPIRATION DATE:** 08/31/2029

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

May 7, 2025  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL ZERO PROCESS  
WASTEWATER-SANITARY  
DISCHARGE PERMIT***



# ZERO PROCESS WASTEWATER - SANITARY DISCHARGE PERMIT

Permit Number: B4100-033-0630

Company Name: **R & D MANUFACTURING CO., INC.**

Facility Address: 60 Dunnell Lane, Pawtucket, RI 02860

Mailing Address: 60 Dunnell Lane, Pawtucket, RI 02860

Facility President: Mr. Philip J. Montalto

Facility Authorized Agent: Mr. Philip J. Montalto

User Classification: Zero Discharge Electroplating and Electroforming Operations

Categorical Standards Applicable: None

In accordance with R.I.G.L. §46-25-1 et. seq. and The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), the Narragansett Bay Commission hereby grants a Zero Process Wastewater-Sanitary Discharge Permit to **Mr. Philip J. Montalto and R & D Manufacturing Co., Inc.**, hereinafter jointly referred to as **Permittee**. This permit authorizes the permittee to discharge only sanitary wastewater into the NBC facilities in accordance with the terms and conditions of this permit. The discharge of any process wastewater streams to the NBC sewer system shall constitute a violation of the permit. This permit consists of 13 pages with conditions A - T and Attachment A.

**This permit becomes effective on July 1, 2025  
and expires on June 30, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

June 26, 2025  
Date

**Mr. Philip J. Montalto and R & D Manufacturing Co., Inc.** hereby consents to this Zero Process Wastewater-Sanitary Discharge Permit. In so consenting, appropriate officers of **R & D Manufacturing Co., Inc.** have personally read and understood each of the numbered provisions in this Zero Discharge Permit. This permit allows **R & D Manufacturing Co., Inc.** to continue to discharge sanitary wastewater into the Narragansett Bay Commission sewer system while operating a process wastewater recycle system on the premises.

A corporation organized under the laws of \_\_\_\_\_,  
composed of officers as follows:

<u>Please Type or Print</u>	<u>Signature</u>	
_____ President	_____	_____ Date
_____ Vice President	_____	_____ Date
_____ Secretary	_____	_____ Date
_____ Treasurer	_____	_____ Date

I have read and understood the Rules and Regulations and the conditions and procedures contained in this permit.

Company Authorized Agent(s) \_\_\_\_\_ **Company Seal**

Title \_\_\_\_\_

Signature \_\_\_\_\_

**NOTE:** The NBC will accept the person(s) named on page 2 of this permit as the company's authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the company's by-laws or per a vote of the directors if the company is a corporation; a general partner or proprietor if the company is a partnership or sole proprietorship respectively; or a duly authorized representative, the individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the company. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Zero Process Discharge-Wastewater Recycle Pretreatment System Requirements:**

1. The permittee shall operate and maintain a Zero Process Discharge Wastewater Recycle Pretreatment System as proposed in the plans that have been approved by the NBC. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:
  - a. Electroplating Operations;
  - b. Electroforming Operations;
  - c. Vibratory Operations.
2. The permittee shall make no changes to the process tanks or pretreatment system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the treatment system on the plans approved by the NBC may be treated on-site in the pretreatment equipment.
3. If any problems with the recycle system arise or if the permittee would like to connect to the sewer for the purpose of discharging any process wastewater streams, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to process tanks, the pretreatment recycle system, or associated piping.
4. The permittee shall cap off and seal all process wastewater sewer drain lines in the facility and no process wastewater may be discharged to the sewer through sanitary or any other sewer connection.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer may be considered an intentional violation of the Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

## **B. Prohibitions:**

1. The permittee is strictly prohibited from discharging any type of process wastewater streams to the NBC sewer system including all prohibited substances as defined in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Electroplating/Metal Finishing Wastewaters;
  - b. Electroforming Wastewaters;
  - c. Cooling Wastewaters;
  - d. Rinse Solutions;
  - e. Soap Cleaning Solutions;
  - f. Cyanide Solutions;
  - g. Acid/Alkaline Solutions;
  - h. Vibratory/Tubbing Wastewaters;
  - i. Metal Cleaning Solutions;
  - j. Degreasing Solutions;
  - k. Solvents;
  - l. Sludges;
  - m. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater or sanitary wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
3. The permittee shall not use portable pumps and flexible hoses within the facility for transfer of solutions without written authorization from the NBC.

## **C. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of sludge generated on a monthly basis;
  - b. Completed manifest forms for hazardous materials;
  - c. Maintenance performed on the pretreatment system and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

#### **D. Certification of No Discharge:**

The permittee shall submit written certification monthly stating that the permittee has made no process wastewater discharges to the sewer during the previous one (1) month period. This certification must be received within thirty (30) days from the end of the required reporting month. This certification must contain monthly water meter readings and must be made on the form designated as Zero Process Wastewater Discharge Certification, Attachment A.

#### **E. Spill and Slug Control Plans:**

Within one (1) month after the effective date of this permit, the permittee must develop and implement a Spill and Slug Prevention Control and Countermeasures Plan and must complete and submit the NBC document Guidance For Development of Spill and Slug Prevention Control Plan And Facilities For NBC Sewer Users. This plan shall include detailed plans of equipment and structures that have been or will be installed to prevent incidental or accidental spills of untreated wastewater or raw materials from entering the NBC facilities. This plan shall include a description of the operating procedures to contain and handle the spill and shall address the questions in the enclosed copy of the guidance document for the development of the plan. The permittee must obtain NBC approval of the Spill and Slug Prevention Control Plan.

#### **F. Toxic Organic/Solvent Management Plan:**

Within one (1) month from the effective date of this permit, the permittee must submit the NBC guidance document entitled Toxic Organic/Solvent Management Plan. This plan must specify the toxic organic compounds used, the method of disposal used instead of dumping, and procedures for ensuring that toxic organic compounds do not routinely spill or leak into the NBC wastewater system. The permittee must obtain NBC approval of the Toxic Organic/Solvent Management Plan. Within one (1) month from the approval date of the Toxic Organic/Solvent Management Plan the permittee must implement the approved Toxic Organic/Solvent Management Plan and maintain all associated facilities to ensure that toxic organic compounds are not routinely discharged or spilled into the NBC sewer system. A list of toxic organic compounds and a sample Toxic Organic/Solvent Management Plan are enclosed.

## **G. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

**H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**J. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. R & D Manufacturing Co., Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event R & D Manufacturing Co., Inc. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event R & D Manufacturing Co., Inc. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of R & D Manufacturing Co., Inc. shall be subject to the terms and conditions of the permit as if named herein.

**K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

## **L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **M. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

## **O. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

KCG:MM:rcf

Attachments:

- Designation of Authorized Agent Form
- RCRA Handbook
- Toxic Organic/Solvent Management Plan
- Spill and Slug Prevention Control Plan
- List of Toxic Organic Compounds
- Monthly Zero Process Wastewater Discharge Certification

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Attachment A**

**Zero Process Wastewater Discharge Certification**

For the Month of \_\_\_\_\_, 20\_\_

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN TO:**  
Narragansett Bay Commission  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905-5502

I, \_\_\_\_\_, as authorized representative of \_\_\_\_\_, do hereby decree that no process wastewater was discharged into the Narragansett Bay Commission sewer system for the past month.

Date of Meter Readings: \_\_\_\_\_

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date

***TYPICAL SEPTAGE HAULER  
WASTEWATER DISCHARGE PERMIT***



## NARRAGANSETT BAY COMMISSION SEPTAGE DISCHARGE PERMIT

Permit Number: B8000-161-0530  
Company Name: **SCHOFIELD SANITATION**  
Company President: Mr. Ronald W. Schofield  
Facility Address: 4420 Diamond Hill Road, Cumberland, RI 02864  
Mailing Address: P.O. Box 7614, Cumberland, RI 02864  
DEM License Number: 338

In accordance with Title 46, Chapter 25 (Act) of Rhode Island General Laws and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), the Narragansett Bay Commission (NBC) hereby authorizes **Mr. Ronald W. Schofield and Schofield Sanitation**, hereinafter jointly referred to as **Permittee**, to discharge residential quality septage to the NBC Lincoln Septage Receiving Station. The Permittee must adhere to the terms, conditions, and procedures of this permit, the Rules and Regulations, and all other applicable federal, state, and local regulations. Any changes to the information initially provided to the NBC by the Permittee in the permit application must immediately be reported to the NBC. This permit is not transferable without the written consent of the NBC. If the Permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

The permittee is authorized to discharge residential quality septage to the NBC Lincoln Septage Receiving Station from the vehicles listed in Attachment A of this permit. This permit consists of two pages with Conditions 1 through 15 and Septage Permit Attachment A.

The permittee shall at all times follow the procedures specified in Attachment A of this permit for adding new septage vehicles and for discharging at the NBC Lincoln Septage Receiving Station.

**This permit becomes effective on June 1, 2025  
and expires on May 31, 2030.**

Noncompliance with any terms or conditions of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by fines and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission**:

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

May 20, 2025  
Date

## CONDITIONS

All terms used herein unless otherwise indicated shall be construed as defined under Section 1.14.4 of the Rules and Regulations.

**1. Location of Discharge:** Septage may be discharged only at the NBC Lincoln Septage Receiving Station or other authorized location as the Commission may designate.

**2. Origins of Septage:** Septage to be discharged to the Commission's facilities must originate from domestic sources within the geographic boundaries of the State of Rhode Island.

**3. Prohibitions:** The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. The discharge of grease or septage loads containing grease is strictly prohibited by this permit. Mixing or blending of grease with septage loads is strictly prohibited. The permittee is strictly responsible for ensuring that loads containing grease are not taken to the NBC Lincoln Septage Receiving Station or enforcement action may result against the permittee.

**4. Procedures for Discharging Septage:** The permittee agrees to adhere to the NBC Septage Discharge Procedures, as detailed in Septage Discharge Permit Attachment A.

**5. Fees:** The permittee agrees to pay an application fee and all other fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**6. Records Retention:** Records which substantiate any information supplied in permit applications, load manifest forms and any other informational requirements of the Rules and Regulations, or any applicable state or federal law, are to be kept by the permittee for a period of three (3) years, unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of three (3) years following resolution of such litigation or dispute.

**7. Jurisdiction:** This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

**8. Integration:** This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of the Rules and Regulations.

**9. Transfer of Permit Prohibited:** Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred, or sold to a new owner, new user, or different vehicle without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said business referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property. The new owner must apply for and be issued a new permit before discharges will be allowed.

**10. Enforcement Costs:** The permittee agrees to reimburse the Commission for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a Court of competent jurisdiction.

**11. Damage to the Facilities:** The permittee agrees to indemnify and hold harmless the Commission from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the Commission and caused by discharges from the permittee, either singly or by interaction with other wastes. If, after the discharge, further analysis of the waste shows it to be in violation of the Commission's wastewater discharge limitations, the Commission may impose fines, pursuant to R.I. General Laws 46-25.

**12. Violation of the Commission's Permit:** The permittee agrees to reimburse the Commission for any penalty and additional operating expense incurred by the Commission for violations of the Commission's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes. Violations of this permit include but are not limited to the following: unauthorized discharge into Commission facilities, discharge without a load ticket or properly completed manifest form, failure to pay fees, and violation of any other applicable laws or regulations.

**13. Penalties for Violations:** Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**14. Revocation of Permit:** Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, discharging or dumping grease, discharging septage into unauthorized locations, falsification of documents, including permit applications or manifest, etc.

**15. Duty to Comply/Civil and Criminal Liability:** The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements. Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

# Septage Discharge Permit Number B8000-161-0530

## Attachment A

### Schofield Sanitation

**PERMITTED VEHICLES:**

VEHICLE TYPE	REGISTRATION NUMBER	TRUCK VIN NUMBER	CAPACITY (GALLONS)
TANKER-PETERBILT	RI 93573	2NP2HJ6X3LM641459	1,914

Procedure for Adding Vehicle(s) to the Permit

1. The permittee must obtain appropriate registrations, insurance and DEM permits for the vehicle(s).
2. The permittee must make an appointment with the NBC Pretreatment personnel to determine the volume of the vehicle(s).
3. The volume of the vehicle is to be determined under NBC oversight as follows:
  - a. The empty vehicle is to be brought to the NBC treatment plant at a scheduled time to be inspected to ensure that it is empty.
  - b. The vehicle will then be weighed empty.
  - c. The vehicle will then be brought back to the NBC plant to be filled with plant water.
  - d. The vehicle will then be reweighed full.
  - e. The vehicle may discharge this water back at the NBC plant.

The difference in weight will be used to determine the volume of the vehicle in gallons.
4. The permittee will be responsible to pay any costs associated with weighing the vehicle(s).
5. NBC personnel will affix a computer chip and volume sticker to the vehicle(s).
6. The Wastewater Discharge Permit will then be revised to include the additional vehicle(s).
7. The permittee may not discharge septage to the NBC receiving station from the new vehicle(s) until the revised permit is issued.

Septage Facility Discharge Procedures

1. The permittee must establish and maintain an account with a positive cash balance with the NBC Customer Service Section.
2. The permittee must ensure each vehicle permitted to discharge must have a computer chip, permitted vehicle decal and volume decal affixed to it.
3. The permittee must ensure the manifest form is completed in its entirety prior to proceeding to the septage facility and submitted to the NBC operator when the vehicle is checked in.
4. The permittee must ensure the volume of the vehicle meets NBC volume/time restrictions.
5. The NBC operator must scan the computer chip affixed to the vehicle.
6. Activate the gate and enter the facility.
7. Obtain a sample of the load from the discharge line of the vehicle.
8. The NBC operator will test the sample and may approve truck for discharge or may reject the load.
9. After NBC approval is granted, the permittee must connect the hose to the station receiving port and may begin discharge.
10. After the discharge is complete, disconnect the hose.
11. The permittee must wash any drippage and/or spillage into drains.
12. The permittee must exit the station.

***TYPICAL RESTAURANT  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P8500-107-0230

Company Name: **LA EXCELENCIA RESTAURANT**

Facility Address: 452 Cranston Street, Providence, RI 02907

Mailing Address: 452 Cranston Street, Providence, RI 02907

Facility Owner: Mr. Francisco Estevez

Facility Authorized Agent: Mr. Francisco Estevez

User Classification: Restaurant/Food Preparation Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for use of the Wastewater Facilities (Rules and Regulations), **Mr. Francisco Estevez and La Excelencia Restaurant**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 12 pages with conditions A - T.

**This permit becomes effective on March 1, 2025  
and expires on February 28, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

February 27, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 12, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following waste, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Food Preparation Wastewater;
  - b. Treated Dish, Pot, and Equipment Wash Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Fryolator/Cooking Oils and Grease;
  - b. Ground Food, Food Products, or Solid Kitchen Waste;
  - c. Degreasing Solutions;
  - d. Solvents;
  - e. Sludges;
  - f. Fuel and Lubricating Oils.

2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1, attached hereto and incorporated herein.
3. The permittee is prohibited from discharging any solution or chemicals which might interfere with the proper operation of the automatic grease removal unit or may cause a violation of the Rules and Regulations.
4. The use of garbage grinders, food macerators, or other equipment used for the purpose of discharging solid waste to the sewer system is strictly prohibited.

**D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge pipe from the automatic grease removal unit, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit at all times.

2. The permittee has installed an automatic grease removal unit in conformance with the plans approved by the NBC. The grease removal unit shall be fully operational on a twenty-four (24) hour basis whenever kitchen operations are being conducted.
3. The permittee is responsible for operating and maintaining the automatic grease removal unit so that the effluent limitations are met at all times. The permittee shall also be responsible for maintaining all records pertaining to the operation of the grease removal unit including, but not limited to, the following:
  - a. The automatic grease removal unit with all associated strainers must be inspected every workday to determine whether the system is functioning normally or in need of cleaning, grease disposal or any corrective measures;
  - b. A grease removal unit logbook must be maintained at the permittee's facility and must be located near the grease removal unit. The logbook must include such information as outlined under Section F, Record Keeping Requirements. The logbook must be kept on the premises at all times and available to NBC personnel for their review;

- c. Only kitchen wastewater from pot sinks, wok stations, and dinnerware/utensil prerinsing operations may be discharged into the automatic grease removal unit. Sanitary waste, dishwasher wastewater and other wastewater may not be discharged to the grease removal unit.
4. The permittee must install additional grease removal equipment that conforms with Section 1.8.8 of the Rules and Regulations if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction, should installation of additional grease removal system be required.

#### **E. Monitoring Requirements:**

No regularly scheduled wastewater monitoring reports are required of the permittee. The NBC may, at any time, change the monitoring requirements specified in this permit. Conditions that may result in the imposition of monitoring requirements include, but are not limited to, the following:

- a. Inspections or samplings performed by NBC personnel;
- b. An increase in the seating capacity of the facility;
- c. An increase in flow to the grease removal unit;
- d. Discovery of additional information unavailable to the NBC at the time this permit was prepared;
- e. Improper maintenance of a grease removal unit;
- f. Failure to meet the NBC effluent discharge limitations.

#### **F. Record Keeping Requirements:**

1. The permittee must inspect and maintain the automatic grease removal unit at least once per day and record in a logbook the time and date (month, day, and year) of the inspection, each grease removal activity, and the name of the individual conducting the activity. Maintenance activities which must be documented in a logbook include the following:
  - a. Cleaning and emptying of the solids basket;
  - b. Cleaning of the wiper blades;
  - c. Cleaning of the trough;
  - d. The estimated amount of grease removed;
  - e. Wet vacuuming of the grease removal unit.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its 24-hr emergency hotline number, 222-6781.**

Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system. Operational changes that may affect the quality or quantity of the process wastestream include, but are not limited to, the following:

- a. Restaurant expansion;
- b. Removal of equipment or installation of additional equipment;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- c. Changes in food preparation methods.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. Grease removal unit heating element failure;
- b. Grease removal unit timing unit failure;
- c. Grease removal unit wiper blade failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

#### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

#### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

#### **J. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. La Excelencia Restaurant shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event La Excelencia Restaurant has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event La Excelencia Restaurant is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of La Excelencia Restaurant shall be subject to the terms and conditions of the permit as if named herein.

## **K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

## **L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **M. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

**O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

AT:MM:rcf

Attachments:

Designation of Authorized Agent Form  
RCRA Handbook  
Automatic Grease Removal Unit Logsheet

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User</b>	<b>Parameter(s)</b>	<b>Limitation</b>
<b>Category/Categories</b>		<b>(lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User</b>	<b>Parameter(s)</b>	<b>Limitation</b>
<b>Category/Categories</b>		<b>(lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

\* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

\*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED FOOD PREPARATION WASTEWATER AND  
TREATED DISH, POT, AND EQUIPMENT WASH WATER**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

La Excelencia Restaurant

452 Cranston Street

Providence, RI 02907

**PERMIT NUMBER:** P8500-107-0230

**PERMIT EXPIRATION DATE:** 02/28/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

February 27, 2025  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL DENTAL OPERATIONS  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P9400-484-0230

Company Name: **JACOB WERBA DDS LTD.**

Facility Address: 655 Broad Street #101, Providence, RI 02907

Mailing Address: 655 Broad Street #101, Providence, RI 02907

Facility Owner: Dr. Jacob Werba

Facility Authorized Agent: Dr. Jacob Werba

User Classification: Dental Operations

Categorical Standards Applicable: 40 CFR §441.30, Pretreatment Standards for Existing Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Dr. Jacob Werba and Jacob Werba DDS Ltd.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 14 pages with conditions A - U and Attachment A.

**This permit becomes effective on March 1, 2025  
and expires on February 28, 2030.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

February 25, 2025  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a dentist and therefore, must at all times comply with 40 CFR §441.30, Pretreatment Standards for Existing Sources as well as the NBC Best Management Practices for the Management of Waste Dental Amalgam.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Dental Wastewater Containing Amalgam;
  - b. Dental Process Wastewater.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances as detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:

- a. X-Ray Processing Rinsewater, Developer, and Fixer Solutions;
  - b. Dental Amalgam;
  - c. Elemental Mercury;
  - d. Untreated Dental Wastewater Containing Amalgam;
  - e. Acidic Solutions with a pH less than 5.0 standard units;
  - f. Caustic Solutions with a pH greater than 11.0 standard units;
  - g. Solvents;
  - h. Sludges.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
  3. Non-sanitary discharges other than those specified in Section B of this permit are prohibited unless specifically approved by the NBC in writing.
  4. No chemicals, oils, solutions and/or materials including solid substances such as towels, casts, etc. in quantities or of such size capable of causing obstruction to the flow in sewers may be discharged to the sewer unless specifically approved by the NBC in writing.
  5. Discharging of medical waste is strictly prohibited.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the amalgam separator, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

3. The permittee shall adhere to all mandatory best management practices of the NBC Best Management Practices for the Management of Waste Dental Amalgam.
4. In accordance with 40 CFR §441.30, Pretreatment Standards for Existing Sources and the NBC Best Management Practices for the Management of Waste Dental Amalgam, the permittee shall install, operate and maintain an amalgam separator which is ISO 11143 certified to an efficiency of 99% removal in accordance with the plans approved by the NBC. The amalgam separator shall be fully operational whenever discharges from dental procedures are occurring.
5. The permittee shall maintain the amalgam separator. Maintenance activities include but are not limited to the following:
  - a. The permittee must inspect the separator weekly to ensure proper operation;
  - b. The permittee must adhere to all manufacturers specifications for maintenance of the separator;
  - c. The maintenance activities must be documented in a logbook as required by Section G(1) of this permit.
6. The permittee has installed chair side traps on all dental chairs to capture large amalgam particles from cuspidors and vacuum systems. Chair side traps must be inspected daily and cleaned or replaced as necessary. Disposable traps or material from reusable traps must be placed in a labeled storage container. The permittee may only rinse a trap if necessary and only in a designated sink that is plumbed with appropriate flow restriction to an NBC approved amalgam separator.
7. The permittee shall ensure that all vacuum pumps are equipped with filters. The permittee shall replace the filter at least once per month or more frequently if necessary. Removed filters should be held over a spill tray to capture any accumulated water from the trap. The water should be carefully decanted without losing any visible amalgam. The decant water, if free of visible amalgam, may be discharged to the sewer through an NBC approved amalgam separator. Dry-turbine vacuums must be inspected to ensure there is no built up sludge in the air/water separator. Collected sludge must be disposed of properly as a mercury containing waste.
8. The permittee shall use a NBC approved cleaner for disinfection of amalgam and/or mercury contaminated vacuum lines, instruments, or equipment. The use of oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine and peroxide that have pH lower than 6 or greater than 8 is prohibited.
9. The permittee has designated one (1) sink for equipment washing. This sink must be plumbed to the amalgam separator through a sample location. Signs stating "Equipment Washing Only" must be posted at this sink. Flow restrictors must be installed on the discharge pipes of this sink to prevent overwhelming the amalgam separator.

10. The permittee has designated eight (8) sinks for sanitary use only. The permittee shall post signs at these sinks stating "Sanitary Use Only". Washing of equipment, instruments, filters, and capsules in these sinks is strictly prohibited.

**E. Certification of Compliance with Best Management Practice:**

The permittee shall submit written annual certification of compliance with Best Management Practices for the Management of Waste Dental Amalgam for the period from May to April. The certification must be made on the form designated as Best Management Practice Certification, Attachment A, and must be received within thirty (30) days after the period for which the certification is being made.

**F. Monitoring Requirements:**

No regularly scheduled wastewater monitoring is required at this time. The NBC may, at any time, require wastewater monitoring. Conditions that may result in the imposition of wastewater monitoring include, but are not limited to, the following:

- a. Failure to meet effluent limitations;
- b. Change in production processes;
- c. Expansion or reduction of production;
- d. Change in water usage;
- e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

**G. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining onsite physically or electronically the manufacturers operating manual for the amalgam separator. In addition, a logbook documenting all records pertaining to the amalgam separator including, but not limited to, the following:
  - a. Date (month, day and year) of each trap and separator inspection and service activity;
  - b. The location of each trap and separator being serviced;
  - c. All routine and non-routine activities conducted (i.e. cleaning, maintenance, filter replacement);
  - d. Date of amalgam retaining container or equivalent container replacement;
  - e. Date when amalgam is picked up or shipped for proper disposal, including name of the permitted or licensed treatment, storage or disposal facility receiving the amalgam retaining containers;
  - f. Signature of person conducting activity.

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **H. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

#### Amalgam Separator Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

## **I. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**J. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**K. Authorization To Do Business:**

The permittee is a limited company. The permittee shall ensure the limited company be registered with the Rhode Island Secretary of State Corporations Division. Jacob Werba DDS Ltd. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Jacob Werba DDS Ltd. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Jacob Werba DDS Ltd. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Jacob Werba DDS Ltd. shall be subject to the terms and conditions of the permit as if named herein.

**L. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**M. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **N. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **O. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

#### **P. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

#### **Q. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **R. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **S. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **T. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **U. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

JU:MM:rcf

Attachments:

Designation of Authorized Agent Form  
RCRA Handbook

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

\* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

\*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Attachment A**

**Best Management Practice Certification**

For the previous 12-month period from \_\_\_\_\_, 20\_\_ to \_\_\_\_\_, 20\_\_

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN TO:**  
Narragansett Bay Commission  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905-5502

I, \_\_\_\_\_, as authorized representative of  
\_\_\_\_\_, do hereby decree that the Narragansett Bay  
Commission Best Management Practices for the Management of Waste Dental Amalgam have  
been fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date

# CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED DENTAL WASTEWATER CONTAINING AMALGAM AND DENTAL PROCESS WASTEWATER

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Jacob Werba DDS Ltd.

655 Broad Street #101

Providence, RI 02907

**PERMIT NUMBER:** P9400-484-0230

**PERMIT EXPIRATION DATE:** 02/28/2030

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

February 25, 2025  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***ATTACHMENT VOLUME I***

***SECTION 3***

***VARIOUS PRETREATMENT  
PROGRAM DOCUMENTS***

***NBC SPILL AND SLUG PREVENTION  
CONTROL & COUNTERMEASURES  
PLAN GUIDANCE DOCUMENT***



**SPILL AND SLUG PREVENTION CONTROL PLAN  
FOR NARRAGANSETT BAY COMMISSION  
SEWER USERS**

**COMPANY NAME:** \_\_\_\_\_

**FACILITY ADDRESS:** \_\_\_\_\_

**MAILING ADDRESS:** \_\_\_\_\_

**PRIMARY PERSON RESPONSIBLE  
FOR SPILL CONTROL PREVENTION:** \_\_\_\_\_

**DAYTIME EMERGENCY PHONE NUMBER:** \_\_\_\_\_

**AFTER HOURS EMERGENCY PHONE NUMBER:** \_\_\_\_\_

The Narragansett Bay Commission (NBC) Rules and Regulations for Use of the Wastewater Facilities (Section 1.8.9) require each user to provide protection from accidental discharge of prohibited materials and substances to the sewer. The user is required to provide detailed plans showing equipment and a brief description of operating procedures utilized to prevent these discharges.

This document was developed to assist you in determining what measures you need to implement and to properly document the spill prevention control procedures utilized at your facility; therefore, you must complete this document.





2. What procedures are utilized to prevent adverse impacts on the NBC sewage facility due to accidental spills? Examples of these procedures may include periodic inspection and maintenance of storage areas, and special procedures utilized during loading and unloading operations.

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3. List emergency response equipment available and procedures to be utilized in the event of a spill.

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**Section C: Spills From Boiler and Fuel Depot Areas**

This section must be completed if fuels, or fuel oils are stored at your facility or chemicals are stored in the boiler area. Be sure to show the location of any floor drains, trenches, yard drains or other connections to the sewer or pretreatment system from the boiler facility and fuel storage area(s) in the sketch required in Section A(4). Also, show any berms or sumps that would be used to contain spills. Indicate the capacity of each holding area in gallons.

1. What types of fuel are stored in these areas? (i.e., gasoline, diesel, kerosene, #4 fuel oil, #6 fuel oil, etc.)

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2. Are the fuel tanks above ground \_\_\_\_\_ or below ground \_\_\_\_\_? Provide the capacity of each tank in gallons:

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3. Indicate provisions (i.e., alarms, sight glasses, etc.) and filling procedures that will minimize the risk of overfilling a tank.

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4. Is the storage tank equipped with an overflow pipe or relief valve or some other equipment in the tank or pipe chase network that would allow fuel to spill during a filling procedure? \_\_\_Yes \_\_\_No

5. If a tank is overfilled and fuel escapes through the tank vent pipe, where would the spilled fuel discharge?

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6. What measures and spill containment equipment are in place to contain spillage from an overfilled tank?

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7. Are boiler treatment or other chemicals stored in the boiler facility or fuel depot areas? \_\_\_Yes \_\_\_No

If yes describe chemicals:

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8. Detail spill containment provided for chemicals stored in this area.

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9. If a spill should occur in the fuel depot or boiler facility, how would it be cleaned up and disposed?

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10. Are there any normal process discharges such as boiler blowdown or steam condensate to the sewer or pretreatment system from physical plant operations?  Yes  No

11. Does the boiler utilize a hot water or steam operated oil preheater?  
 Yes  No

If so, does the condensate from the preheater discharge to the sewer?

Yes  No

If so, what measures are in place to detect an oil discharge to the sewer resulting from a leak within the preheater core?

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**Section D: Spills That Discharge to Pretreatment Systems**

This section must be completed in the case where a spill will discharge to a pretreatment system.

1. For each area listed in Section A(3) that a spill would discharge to the pretreatment system, you must provide the following information:

Area	Solution	Pretreatment Collection Vessel
Example: Plating	CN Bearing Solutions	CN Destruct Tank
Example: Plating	Non-CN Bearing Solution	Batch A/A Tank

2. During non-working hours, what procedures will be followed to prevent spills from discharging directly through pretreatment to the sewer without proper treatment? (e.g., shut off sump pump, close valve to sump, etc.)

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3. What procedures or facilities are in place to prevent highly concentrated or incompatible solutions (such as plating baths, oils, solvents, etc.), which the pretreatment system was not designed to treat, from reaching the pretreatment system?

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**Section E: Notification Procedures**

1. The sewer user must maintain an approved Spill and Slug Prevention Control and Countermeasure Plan and all associated facilities at all times to ensure that incidental and accidental spills are not able to enter the NBC sewer system. In the case of a slug or accidental discharge to the facilities, it is the responsibility of the sewer user to notify the NBC of the incident immediately by calling the NBC's Pretreatment Section at 461-8848. During non-business hours contact the NBC at its 24 Hour Emergency Hotline number, 222-6781 if located in the Field's Point District or at 434-6350 if located in the Bucklin Point District.
2. Within five days following an accidental discharge, the sewer user shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences.

**Section F: Certification**

I certify under penalty of law that this Spill and Slug Control Plan and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who maintain the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify that this facility will fully implement and maintain the Spill and Slug Control Plan at all times.

---

SIGNATURE AND TITLE OF AUTHORIZED COMPANY REPRESENTATIVE

---

DATE

**Attachment A\***

Area/Room: \_\_\_\_\_  
List Chemicals Stored in Area: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List the Volume of the Largest Container in Area: \_\_\_\_\_

Are there open floor drains or sewer connections in this area? \_\_\_\_\_

List spill control measures in place: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List capacity of spill containment area(s). Please note, the capacity of the containment area must be a minimum of 110% the volume of the largest container.

\_\_\_\_\_  
\_\_\_\_\_

Detail how a spill would be contained during working hours.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Detail how a spill would be contained during non-working hours. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

How will spills from this area be cleaned up and disposed? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

If currently there are no spill containment measures in this area, detail proposed measures to provide spill containment for chemicals and solutions in this area and the timeframe necessary to implement these measures.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* Please make additional copies of this attachment for all areas of your facility.

***NBC TOXIC ORGANIC/SOLVENT  
MANAGEMENT PLAN GUIDANCE  
DOCUMENT***



**NARRAGANSETT BAY COMMISSION  
TOXIC ORGANIC/SOLVENT  
MANAGEMENT PLAN**

**COMPANY NAME:** \_\_\_\_\_  
**MAILING ADDRESS:** \_\_\_\_\_  
**PHONE NUMBER:** \_\_\_\_\_  
**PLAN PREPARED BY:** \_\_\_\_\_

In accordance with Section 1.7.2(A)(5) of the Narragansett Bay Commission (NBC) Rules and Regulations for Use of the Wastewater Facilities, the NBC may require any user who discharges into the facilities to provide information relating to discharges into the facilities to ensure compliance with prescribed pretreatment methods and regulations. Federal pretreatment standards, including those for metal finishers and electroplaters (40 CFR 413.03 and 433.12), require many industrial users to periodically monitor their wastestream for Total Toxic Organics (TTO's). Federal law allows the Industrial User to develop, implement and maintain a Toxic Organic/Solvent Management Plan, which once approved by the NBC, allows the Industrial User a waiver from performing the expensive and routine TTO monitoring.

In order to provide for the control of solvents and toxic organics which are not permitted to be discharged to the NBC sewerage facilities, the NBC is requiring, as a condition of the industrial sewer user's Wastewater Discharge Permit, that a Toxic Organic/Solvent Management Plan be prepared and submitted to the NBC in lieu of the regular monitoring for toxic organic compounds and solvents.

This form has been developed as a guidance document by the NBC Pretreatment Section to assist sewer users who must prepare a Toxic Organic/Solvent Management Plan. When completed, submitted and approved by the NBC this document will constitute the facility's Toxic Organic/Solvent Management Plan. The user will then be responsible to maintain all items indicated in this plan to ensure that solvents and toxic organic compounds are not discharged into the NBC sewerage system.

**Section A – Estimated Annual Solvent Purchases and Usages:**

Does your firm use any solvents, chemicals or compounds containing any of the toxic organic compounds listed on the EPA table of toxic organics attached to this document, or any other solvents, such as xylene, acetone, etc., not listed on the attached table? \_\_\_\_\_

If yes, you must complete all sections of this Toxic Organic/Solvent Management Plan. If no, you must sign the certification Section F of this plan.

List the type and estimated amount of solvents or toxic organic chemicals purchased and used yearly at this facility and provide a brief description detailing the usage of the chemical. A list of EPA toxic organic compounds is attached for your information. In addition to the compounds on this list, any other solvents purchased or used on the premises must be included (i.e. Acetone, 100 gallons/yr., used for paint removal).

Solvent	Use of Solvent	Estimated Gallons Annually Purchased

**Section B – Estimate of Solvents Stored and Annually Disposed:**

You must account for the total gallons of each solvent or toxic organic chemical listed in Section A. Indicate the estimated volume of each chemical presently stored on site and the estimated volume disposed of annually by each method



If yes, please attach a copy of the analysis. If no, this monitoring must be conducted and the analytical results for each toxic organic compound and solvent listed in Section A must be attached to the plan.

**Section D – Solvent Process Operations:**

1. For each of the toxic organic compounds or solvents listed in Section A, provide a brief description of the process in which the chemical is used and describe in detail the work methods used to prevent and prohibit toxic organic and solvent dragout, drippage and spillage from entering the wastewater discharged from the facility.

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2. For any solvent listed in Section B as being discharged in the wastewater, please provide a brief description detailing the discharge method, practice, procedure, or process operation resulting in each solvent discharge.

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**Section E – Spill Control Procedures:**

Describe the spill control procedures in effect for the toxic organic compounds and solvent on the premises. This would include measures taken in both the chemical storage area and in the work area to prevent incidental and accidental spillage from entering the NBC sewerage system. Measures to prevent and control spillage may include berms, sealed floor drains, absorbent material, etc. Indicate the volume of the largest vessel within each storage area and the capacity of the storage area itself. Please note that a storage area is required to contain a minimum of 110% the capacity of the largest vessel stored within it.

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**Section F – Certification Statement:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry or the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine

and imprisonment for knowing violations. I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), to the best of my knowledge and belief, no dumping of concentrated toxic organic compounds into the wastewaters has or does occur. I further certify that this facility is implementing and will abide by this Toxic Organic/Solvent Management Plan as submitted to the NBC.

\_\_\_\_\_  
SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
DATE

## List of Toxic Pollutants

The following List of Toxic Pollutants has been designated pursuant to Section 307(a)(1) of the Clean Water Act.

### Volatiles

#### EPA Method 624

arolein  
acrylonitrile  
benzene  
bromoform  
carbon tetrachloride  
chlorobenzene  
chlorodibromomethane  
chloroethane  
2-chloroethylvinyl ether  
chloroform  
dichlorobromomethane  
1,1-dichloroethane  
1,2-dichloroethane  
1,1-dichloroethylene  
1,2-dichloropropane  
1,3-dichloropropylene  
ethylbenzene  
methyl bromide  
methyl chloride  
methylene chloride  
1,1,2,2-tetrachloroethane  
tetrachloroethylene  
toluene  
1,2-trans-dichloroethylene  
1,1,1-trichloroethane  
1,1,2-trichloroethane  
trichloroethylene  
vinyl chloride

### Acid Compounds

#### EPA Method 625

2-chlorophenol  
2,4-dichlorophenol  
2,4-dimethylphenol  
4,6-dinitro-o-cresol  
2,4-dinitrophenol  
2-nitrophenol  
4-nitrophenol  
p-chloro-m-cresol  
pentachlorophenol  
phenol  
2,4,6-trichlorophenol

### Base/Neutral

#### EPA Method 625

\* acenaphthene  
\* acenaphthylene  
\* anthracene  
benzidine  
\* benzo (a) anthracene  
\* benzo (a) pyrene  
\* 3,4-benzofluoranthene  
\* benzo (ghi) perylene  
benzo (k) fluoranthene  
bis (2-chloroethoxy) methane  
bis (2-chloroethyl) ether  
bis (2-chloroisopropyl) ether  
bis (2-ethylhexyl) phthalate  
4-bromophenyl phenyl ether  
butylbenzyl phthalate  
2-chloronaphthalene  
4-chlorophenyl phenyl ether  
\* chrysene  
\* dibenzo (a, h) anthracene  
1,2-dichlorobenzene  
1,3-dichlorobenzene  
1,4-dichlorobenzene  
3,3-dichlorobenzidine  
diethyl phthalate  
dimethyl phthalate  
di-n-butyl phthalate  
2,4-dinitrotoluene  
2,6-dinitrotoluene  
di-n-octyl phthalate  
1,2-diphenylhydrazine  
(as azobenzene)  
\* fluoranthene  
\* fluorene  
hexachlorobenzene  
hexachlorobutadiene  
hexachlorocyclopentadiene  
hexachloroethane  
\* indeno (1,2,3-cd) pyrene  
isophorone  
\* naphthalene  
\* nitrobenzene  
N-nitrosodimethylamine  
N-nitrosodi-n-propylamine  
N-nitrosodiphenylamine  
\* phenanthrene  
\* pyrene  
1,2,4-trichlorobenzene

\*- Polynuclear Aromatic Hydrocarbons

### Pesticides

#### EPA Method 625

aldrin  
alpha - BHC  
beta - BHC  
gamma - BHC  
delta - BHC  
chlordan  
4,4' - DDT  
4,4' - DDE  
4,4' - DDD  
dieldrin  
alpha-endosulfan  
beta-endosulfan  
endosulfan sulfate  
endrin  
endrin aldehyde  
heptachlor  
heptachlor epoxide  
PCB-1242  
PCB-1254  
PCB-1221  
PCB-1232  
PCB-1248  
PCB-1260  
PCB-1016  
toxaphene

### Other Toxic Pollutants and Total Phenol

Antimony, Total  
Arsenic, Total  
Beryllium, Total  
Cadmium, Total  
Chromium, Total  
Chromium, Hexavalent  
Copper, Total  
Lead, Total  
Mercury, Total  
Nickel, Total  
Selenium, Total  
Silver, Total  
Thallium, Total  
Zinc, Total  
Asbestos  
Cyanide, Total  
Phenols, Total  
TCDD (Dioxin)

***NBC SIGNIFICANT INDUSTRIAL USER  
ANNUAL INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION



Annual Inspection Checklist  
For Significant Industrial Sewer Users

Company Name: \_\_\_\_\_ Engineer: \_\_\_\_\_  
Contact Person(s): \_\_\_\_\_ Date: \_\_\_\_\_  
Other Person(s) in Attendance: \_\_\_\_\_  
Company Classification: Electroplater \_\_\_\_\_ Metalfinisher \_\_\_\_\_  
Other (specify): \_\_\_\_\_

**Part I - Outstanding Requirements/Progress Since Last Inspection**

(a) What progress was required of the firm since the last annual inspection? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(b) Has required work been completed? Yes No  
If no, when will it be completed? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(c) What work has facility initiated on its own to improve wastewater discharge?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(d) Has facility expanded/scaled down operations? Yes No  
If yes, describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



(c) Who operates the pretreatment system? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(d) List all water using operations that are **not** pretreated (e.g. casting, tubbing, boiler blowdown, cooling water, etc.). \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(e) Is there an operation and maintenance manual maintained on site for pretreatment system? Yes No N/A

(f) Are there any spare parts maintained on site for the pretreatment equipment? Yes No N/A

If yes, list spare parts. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(g) Has system been installed according the NBC specifications? Yes No N/A

If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* Check pretreatment system piping, decant ports, transfer pumps, pH recording probe location, etc.

(h) Has system been installed according to NBC approved plans? Yes No N/A

If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* Compare plans with existing system.

- (i) Have changes been made to process operations or pretreatment system without NBC notification and approval? Yes No

If yes, detail changes. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (j) Are any hydroxide sludges or other sludges produced at this facility from pretreatment operations? Yes No

If so, indicate type of sludge, volume, and source (e.g. Hydroxide sludge from clarifier, etc.) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (k) Is any type of sludge discarded in the trash? Yes No  
If yes, specify. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

- (l) Are any concentrates or other hazardous materials removed by hazardous waste contractors (e.g. spent solvents, etc.)? Yes No

If yes, list types and amounts. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (m) Does the facility utilize ion-exchange resins? Yes No  
If yes, are ion-exchange columns regenerated on site? Yes No  
If yes, how often are columns regenerated? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

How is regenerate material disposed of? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How are columns regenerated? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Has the Pretreatment staff observed and sampled during the regeneration procedure? Yes No

If no, be sure to observe and arrange sampling of the regenerant.

### **Part III - Maintenance and Record Keeping**

(a) Is pH recording/reporting required? Yes No

(i) Are pH charts being maintained? Yes No N/A

(ii) Do pH charts agree with monthly reports? Yes No N/A  
If no, detail inaccuracies. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(iii) Are the pH charts being dated properly (month, day, and year)?  
Yes No N/A

(b) Provide the following pre-inspection pH calibration data:

NBC pH Pen # \_\_\_\_\_ Date of Calibration: \_\_\_\_\_  
(mm/dd/yy)

(c) Are facility pH probes in calibration at the time of the inspection?  
Yes No N/A

pH readings: NBC \_\_\_\_\_ s.u. Company \_\_\_\_\_ s.u.

\* If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.

(d) How often are pH and/or ORP probes cleaned and calibrated? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

(e) If discrepancy was observed, check instruments using the company's buffer solutions and complete the following:

	<u>#1</u>	<u>#2</u>	<u>#3</u>
pH of buffer			
pH using NBC instrument			
pH registered by facility instrument			
Expiration date of buffer			

If discrepancy was observed, a post inspection calibration check must be performed at Pretreatment lab on the same day as the inspection and the following must be completed:

- a) NBC Instrument pH in buffer 4.0: \_\_\_\_\_
- b) NBC Instrument pH in buffer 7.0: \_\_\_\_\_
- c) NBC Instrument pH in buffer 10.0: \_\_\_\_\_

(f) Is the facility required to maintain a logbook? Yes No

If yes, is the logbook being maintained? Yes No

Does the logbook properly document the following?

(i) Batch discharges? Yes No N/A

(ii) Chemicals used for pretreatment system? Yes No N/A

(iii) Sludge generated on a daily, weekly, or monthly basis?  
 Yes No N/A

(iv) Maintenance performed on pretreatment system? Yes No N/A

(v) Visual inspecting data for boiler room discharges? Yes No N/A

(vi) Grease interceptor inspection? Yes No N/A



(g) Is spill control in the boiler room satisfactory? Yes No N/A  
 If no, what will be required to ensure proper containment in the boiler room?

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(h) Based upon the facility inspection and observations noted in d, e, f, and g above, is the existing SSPCP accurate and sufficient? Yes No N/A  
 If no, why? \_\_\_\_\_

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(i) Is submission of a Toxic Organic/Solvent Management Plan (TO/SMP) necessary? Yes No

(j) Has TO/SMP been submitted? Yes No N/A

(k) Has TO/SMP been approved? Yes No N/A

(l) Is there proper containment of solvents as stated in the TO/SMP? Yes No N/A

(m) Is the existing TO/SMP accurate and sufficient? Yes No N/A

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**Part V - Process Flow Measurement**

(a) How many flow meters are used to measure process wastewater discharges?

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(b) Complete the following table for each process

<u>Location</u>	<u>Process Operation Monitored</u>	<u>Readings</u>	<u>Units</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- (c) Are these flow meter readings an accurate measurement of process flows?  
Yes No N/A
- (d) If not, list user's estimate of the percent of total flow used for process water.  
\_\_\_\_%
- (e) Based upon \_\_\_\_\_, for the period from \_\_\_\_\_ to \_\_\_\_\_, the average daily process flow is \_\_\_\_\_GPD.
- (f) Based upon daily flow calculation, is user properly classified for permit fee billing purposes?  
Yes No N/A

**Part VI - Sampling Procedures**

- (a) Where should representative samples be taken for NBC and self-monitoring?  
\_\_\_\_\_
- (b) Are samples taken here presently? Yes No  
If no, why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (c) Are non-contact cooling water or other dilution streams discharged upstream of the sampling location?  
Yes No
- \* Check degreaser cooling water and steam condensate discharge lines.
- (d) Must the combined wastestream formula be used to determine compliance with EPA categorical pretreatment standards? (e.g. Does wastewater discharge through more than one (1) location?)  
Yes No
- (e) Does the firm conduct its own sample collection? Yes No  
If not, specify: \_\_\_\_\_
- (f) Is method of sample collection acceptable? Yes No  
If no, why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (g) If firm is a metalfinisher, does cyanide sampling satisfy EPA requirements? Yes    No    N/A

If no, what must be changed? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- (h) Are sample collection procedures adequate?

(i) Samples refrigerated after collection? Yes    No    N/A

(ii) Proper preservation techniques used? Yes    No    N/A

(iii) How long are samples held before delivery to the laboratory for analysis? \_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**PART VII - LABORATORY ANALYSIS**

- (a) Is a commercial laboratory used? Yes    No

If so, which lab? \_\_\_\_\_

- (b) Is commercial lab state certified? Yes    No    N/A

- (c) For in-house analysis:

(i) Are duplicate samples analyzed? Yes    No    N/A

(ii) Are spiked samples used? Yes    No    N/A

(iii) Are equipment and instruments calibrated and maintained?  
Yes    No    N/A

(iv) Is there a quality assurance plan in effect? Yes    No    N/A

(v) Is in-house lab state certified? Yes    No    N/A

(vi) If yes, request and attach copy of in-house lab certification and approved parameters.

**Part VIII - User Education**

(a) Educate users about each of the following:

Significant Non-Compliance (SNC) Criteria: Yes No

NBC Mission Statement: Yes No

Purpose and Types of NBC Inspections: Yes No

Monitoring and Reporting Requirements/Procedures: Yes No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(b) Was the area outside the facility inspected? Yes No

Was litter observed? Yes No

If yes, educate the user of the impacts of litter on the sewer system.



***NBC INDUSTRIAL USER  
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION

Inspection Checklist  
For Industrial Users

Company Name: \_\_\_\_\_ Tech./Eng.: \_\_\_\_\_  
Person(s) Met With: \_\_\_\_\_ Date: \_\_\_\_\_  
Company Classification: \_\_\_\_\_

**Part I – Requirements/Progress Since Last Inspection**

- (a) What was required of the firm since last inspection? \_\_\_\_\_  
\_\_\_\_\_
- (b) Has required work been completed?  Yes  No  
If no, when will it be completed? \_\_\_\_\_  
\_\_\_\_\_

**Part II –Pretreatment Equipment and Process Operations**

- (a) List areas of the facility that were inspected:  
 Process Operations  
 Pretreatment Operations  
 Other: \_\_\_\_\_
- (b) Have changes been without NBC notification and approval  Yes  No  
If yes, detail changes. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Part III – Maintenance and Record Keeping**

- (a) Is pH recording required?  Yes  No
  - (b) Are facility pH probes in calibration at the time of the inspection?  
 Yes  No  N/A
- pH readings: NBC \_\_\_\_\_s.u. Company \_\_\_\_\_s.u
- \* If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.
- (c) How often are pH probes cleaned and calibrated? \_\_\_\_\_
  - (d) Is the facility required to maintain a logbook?  Yes  No  
If yes, is the logbook being maintained?  Yes  No  N/A  
If no, please specify \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Part IV – Spill, Slug, and Solvent Discharge Control**

- (a) Does the facility have a Spill & Slug Prevention Control Plan (SSPCP)? \_\_Yes \_\_No \_\_N/A
- (b) Has a SSPCP been approved? \_\_Yes \_\_No \_\_N/A
- (c) Are spill control measures physically in place as stated in SSPCP? \_\_Yes \_\_No \_\_N/A

If no, Explain \_\_\_\_\_  
\_\_\_\_\_

\* Check for open drains or other direct sewer access points.

- (d) Does the facility have a Toxic Organic/Solvent Management Plan (TO/SMP)? \_\_Yes \_\_No \_\_N/A
  - (e) Has TO/SMP been submitted? \_\_Yes \_\_No \_\_N/A
  - (f) Has TO/SMP been approved? \_\_Yes \_\_No \_\_N/A
  - (g) Is the existing TO/SMP accurate and sufficient? \_\_Yes \_\_No \_\_N/A
- If no, Explain \_\_\_\_\_  
\_\_\_\_\_

**Part V - Process Flow Measurement:**

- (a) How many flow meters are used to measure process wastewater discharges?  
\_\_\_\_\_

- (b) Complete the following table for each process

Location	Process Operation Monitored	Readings	Units
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**Part VI – Comments/Requirements:**

Engineers Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

What will be required of the firm? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If this is an industrial vacation shutdown inspection, please provide a copy of the NBC notice detailing the proper disposal methods that should be used during the annual facility vacation shutdown.

Is the facility shutting down for vacation? \_\_Yes \_\_No \_\_N/A  
If yes, provide dates \_\_\_\_\_

***NBC BREWERY-DISTILLERY  
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION

Brewery/Distillery Inspection Checklist  
For Industrial Users

Company Name: \_\_\_\_\_ Technician/Engineer: \_\_\_\_\_  
Person(s) Met With: \_\_\_\_\_ Date: \_\_\_\_\_  
Company Classification: \_\_\_\_\_

**Part I – Requirements/Progress Since Last Inspection**

- (a) What was required of the firm since last inspection? \_\_\_\_\_  
\_\_\_\_\_
- (b) Has required work been completed?  Yes  No  
If no, when will it be completed? \_\_\_\_\_  
\_\_\_\_\_

**Part II –Pretreatment Equipment and Process Operations**

- (a) List areas of the facility that were inspected:  
 Process Operations  Pretreatment Operations  
 Other: \_\_\_\_\_
- (b) Have changes been made without NBC notification and approval  Yes  No  
If yes, detail changes. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Part III – Maintenance and Record Keeping**

- (a) Is pH recording required?  Yes  No
- (b) Are facility pH probes in calibration at the time of the inspection?  Yes  No  N/A
- pH readings: NBC \_\_\_\_\_ s.u. Company \_\_\_\_\_ s.u
- \* If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.
- (c) How often are pH probes cleaned and calibrated? \_\_\_\_\_
- (d) Is the facility required to maintain a logbook?  Yes  No  
If yes, is the logbook being maintained?  Yes  No  N/A  
If no, please specify \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



***NBC DENTAL FACILITY  
INSPECTION CHECKLIST***

# NARRAGANSETT BAY COMMISSION



## Inspection Checklist For Dental Facilities

Company Name: \_\_\_\_\_  
Facility Address: \_\_\_\_\_  
Inspection Date: \_\_\_\_\_ NBC Inspector(s): \_\_\_\_\_  
Person(s) met with: \_\_\_\_\_

### Part I – Facility Information

- (1) Company Owner: \_\_\_\_\_
- (2) Contact Person: \_\_\_\_\_
- (3) Phone Number: \_\_\_\_\_
- (4) Hours of Operation: \_\_\_\_\_
- (5) Type of Dental Facility: \_\_\_\_\_
- (6) Make/Model of Amalgam Separator: \_\_\_\_\_

### Part II - Requirements/Progress Since Last Inspection

- (1) What was required of the firm since the last inspection? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (2) Has required work been completed? Yes No  
If no, when will it be completed? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (3) Have all required reports (BMP Certification, SMCRs) been submitted on time? Yes No  
If no, discuss the ramifications of late submittals and SNC with the user \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (4) Has the firm been in compliance for the past 12 month period? Yes No  
If no, detail the compliance issues and discuss with the user. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Part III – Amalgam Separator Maintenance/Installation Information**

(1) Has the amalgam separator been installed according to NBC approved plans? \* Yes    No  
If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_

\* Compare plans with existing system.

(2) Have changes been made without NBC notification and approval? [    ] "P q  
If yes, detail changes. \_\_\_\_\_  
\_\_\_\_\_

(3) Unit accessible? Yes    No

(4) Solids container was present and operational? Yes    No

(5) Level of sediment in solids collection container: \_\_\_\_\_

(6) Date solids container was last replaced/emptied: \_\_\_\_\_

(7) Sample port was properly installed? Yes    No

(8) Unit has been properly maintained? Yes    No

(9) How is waste amalgam disposed of? \_\_\_\_\_  
\_\_\_\_\_

(10) Type of vacuum pumps installed: \_\_\_\_\_  
Verify that vacuum pump is equipped with a filter.

(11) Number of sinks discharging to the separator: \_\_\_\_\_  
Verify that all sinks discharging to the separator are properly designated for equipment washing only.

(12) Are chair side traps present on all dental chairs? Yes    No  
Verify that chair side traps are being inspected daily and cleaned or replaced as necessary.

(13) Type of line cleaner used: \_\_\_\_\_

(14) Is elemental mercury stored onsite? If yes, how is it stored and disposed of? \_\_\_\_\_  
\_\_\_\_\_

**Part IV – X-Ray Processor System Information**

- (1) Is x-ray processing performed at this facility? Yes No
- (2) Are there discharges to the sewer from x-ray processing operations? Yes No  
 If yes, detail discharges. \_\_\_\_\_  
 \_\_\_\_\_
- (3) Is there a silver recovery unit in place? Yes No
- (4) Has silver recovery unit been installed according to NBC approved plans?, [ gu""P q  
 If no, what needs to be corrected? \_\_\_\_\_  
 \_\_\_\_\_
- \*Compare plans with existing system.
- (5) Sample port was properly installed? Yes No
- (6) Unit has been properly maintained? Yes No

**Part V – Record Keeping**

- (1) Is the facility required to maintain an amalgam separator logbook? Yes No
- (2) Does the amalgam separator logbook properly document the following?
- a. The date of each separator inspection and service activity? Yes No
  - b. The location of each trap and separator being serviced? Yes No
  - c. All routine and non routine activities conducted (i.e. cleaning, maintenance, filter replacement)? Yes No
  - d. Signature of person conducting activity? Yes No
- (3) Is the facility required to maintain a x-ray processor system logbook? Yes No
- (4) Does the x-ray processor system logbook properly document the following?
- a. Amount of chemicals used (i.e. fixer, developer)? Yes No N/A
  - b. Completed manifest forms for hazardous materials? Yes No N/A
  - c. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred? Yes No N/A
  - d. Maintenance performed on the pretreatment system? Yes No N/A

**Part VI - User Education**

(1) Educate users about each of the following:

NBC Dental BMP Program:	Yes	No
Permit/Logbook Requirements:	Yes	No
Monitoring and Reporting Requirements/Procedures:	Yes	No

**Comments:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**What will be required of firm?** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

***NBC FOOD PREPARATION  
ESTABLISHMENTS INSPECTION  
CHECKLIST***

# NARRAGANSETT BAY COMMISSION



## Inspection Checklist For Food Preparation Establishments

Inspection Date: \_\_\_\_\_

Company Name: \_\_\_\_\_

Facility Address: \_\_\_\_\_

Technician/Engineer: \_\_\_\_\_

Person(s) met with: \_\_\_\_\_

### Part I - Facility Information

- (1) Company Owner: \_\_\_\_\_
- (2) Contact Person: \_\_\_\_\_
- (3) Type of GRU: \_\_\_\_\_
- (4) Brand of GRU: \_\_\_\_\_
- (5) Size of GRU: \_\_\_\_\_
- (6) Type of food served: \_\_\_\_\_
- (7) Hours of Operation: \_\_\_\_\_
- (8) Seating Capacity: \_\_\_\_\_
- (9) Based upon seating capacity, is user properly classified for permit fee billing purposes?                      Yes      No
- (10) Menu on file?                      Yes      No
- (11) Drive through window?                      Yes      No

### Part II - Requirements/Progress Since Last Inspection

- (1) What was required of the firm since the last inspection? \_\_\_\_\_
- (2) Has required work been completed?                      Yes      No      N/A  
If no, when will it be completed? \_\_\_\_\_

### Part III - GRU Maintenance/Installation Information

- (1) Has grease removal system been installed according to NBC approved plans? \*  
Yes No N/A

If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_

\* Compare plans with existing system.

- (2) Have changes been made without NBC notification and approval? (kitchen fixtures, menu, grease removal unit, etc.) Yes No N/A

If yes, detail changes. \_\_\_\_\_  
\_\_\_\_\_

- |   |     |    |     |
|---|-----|----|-----|
| (3) Unit accessible?                                    | Yes | No | N/A |
| (4) Power supplied to GRU?                              | Yes | No | N/A |
| (5) GRU solids basket was present and operational?      | Yes | No | N/A |
| (6) Solids basket had been emptied?                     | Yes | No | N/A |
| (7) GRU wiper blades were fully operational?            | Yes | No | N/A |
| (8) GRU trough was clean and operational?               | Yes | No | N/A |
| (9) GRU timer was fully operational?                    | Yes | No | N/A |
| (10) GRU installed in accordance with NBC requirements? | Yes | No | N/A |
| (11) Sample port was properly installed?                | Yes | No | N/A |
| (12) Grease container present?                          | Yes | No | N/A |
| (13) Unit has been properly cleaned?                    | Yes | No | N/A |
| (14) How is waste grease disposed of? _____<br>_____    |     |    |     |

## **Part IV - Record Keeping**

- |  |       |        |         |
|--|-------|--------|---------|
| (1) Is the facility required to maintain a logbook?        | Yes   | No     | N/A     |
| If yes, logbook is required to be maintained               | Daily | Weekly | Monthly |
| Is the logbook being maintained at the required frequency? | Yes   | No     |         |
- 
- |  |     |    |     |
|--|-----|----|-----|
| (2) Does the logbook properly document the following?                                |     |    |     |
| a. Cleaning and emptying of solids basket?   | Yes | No | N/A |
| b. Cleaning of wiper blades?   | Yes | No | N/A |
| c. Cleaning of trough?   | Yes | No | N/A |
| d. Estimated amount of grease removed?   | Yes | No | N/A |
| e. Wet vacuuming of the GRU?   | Yes | No | N/A |
| f. Thickness of the grease layer (passive)?  | Yes | No | N/A |
| g. Mandatory monthly cleanings incl. amount of grease removed, date, time (passive)? | Yes | No | N/A |
| h. Maintenance performed?  | Yes | No | N/A |
| i. Physical receipts for each pump-out retained?                                     | Yes | No | N/A |

## **Part V - User Education**

- |   |     |    |     |
|---|-----|----|-----|
| (1) Educate users about each of the following:    |     |    |     |
| NBC Grease Removal Program:                       | Yes | No | N/A |
| Permit/Logbook Requirements:                      | Yes | No | N/A |
| Monitoring and Reporting Requirements/Procedures: | Yes | No | N/A |

**Comments:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**What will be required of firm?** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

***NBC SEPTAGE TRUCK  
INSPECTION CHECKLIST***

Lincoln Septage Facility  
Septage Truck Inspection Checklist

Inspector : \_\_\_\_\_  
Inspection Date: \_\_\_\_\_  
Septage Hauler: \_\_\_\_\_  
Vehicle Inspected: \_\_\_\_\_  
Drivers Name: \_\_\_\_\_

Vehicle Inspection

Registration OK?	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Call State Police
Insurance Card Ok?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
NBC Volume Sticker In Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV
NBC Permitted User Sticker in Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV
NBC Computer Chip In Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV

Paperwork Review

Manifest Properly Completed  Yes  No – Issued Nov and Refuse Load.

If No, List Problems: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Waste Discharge Inspection

pH of Waste: \_\_\_\_\_ s.u.

Was grease observed in Sample?  Yes  No - If yes, Refuse Load and Collect Sample for Evidence.

Was grease observed in lakeside?  Yes  No - If yes, Stop Load Discharge and Collect Sample.

Educational Procedure Review

Manifest Paperwork Completion procedure was reviewed with driver  Yes  No  
Grease Policy reviewed with driver  Yes  No

Other Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

***NBC SAMPLING, REPORTING, AND  
CHAIN OF CUSTODY FORMS***



**The Narragansett Bay Commission**  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905

**Field's Point District  
Self-Monitoring Compliance Report**

Company Name: \_\_\_\_\_

Address of Premises Sampled: \_\_\_\_\_

Date(s) Sampled: \_\_\_\_\_

Permit Sampling Month Satisfied: \_\_\_\_\_

Samples Taken By: \_\_\_\_\_  
(Name) (Company)

Samples Analyzed By: \_\_\_\_\_  
(Company)

Type of Sample: Grab \_\_\_\_\_ Composite \_\_\_\_\_

If Grab Sample, what time(s) was sample taken? \_\_\_\_\_

If Composite Sample, describe how composite was taken \_\_\_\_\_

Where was sample taken? \_\_\_\_\_

Water Meter Readings (List readings for all meters discharging to sampling location)

	#1	#2	#3
Closing Reading:	_____	_____	_____
Opening Reading:	_____	_____	_____
Total:	_____	_____	_____
Units (Circle One):	Cubic Feet/Gallons	Cubic Feet/Gallons	Cubic Feet/Gallons
	Other (Specify):_____	Other (Specify):_____	Other (Specify):_____

Were any batch discharges sampled? \_\_\_\_\_ Yes \_\_\_\_\_ No

What tank was sample taken from? \_\_\_\_\_

Indicate volume of batch discharge: \_\_\_\_\_

Is this analysis a resampling required to demonstrate compliance with a previous violation?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

What is the sample identification number(s) or the analytical report identification number(s) indicated on the analytical report(s) being submitted? \_\_\_\_\_

Is this analysis in full compliance with NBC standards listed on the back of this form?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

If your firm was in violation, what was the cause of the violation? \_\_\_\_\_

What steps will be taken by your firm to ensure full compliance with NBC standards on a continuous basis? \_\_\_\_\_

When will these steps be implemented? \_\_\_\_\_

If your firm is not in full compliance with the NBC standards, U.S. EPA Regulations, 40 CFR 403.12g (2) requires that you notify the NBC at 461-8848 within 24 hours of becoming aware of the violation and that your firm resample and analyze for the parameter(s) in violation of the NBC standards. The results after resampling must be submitted to the NBC no later than thirty (30) days following the date that you became aware of the initial violation of the standards.

Please attach the laboratory analysis sheet. Indicate on this sheet the method of analysis used for each parameter listed. Sampling and analysis shall be performed in accordance with the techniques prescribed by federal regulations (40 CFR, Part 136).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In lieu of monitoring for Total Toxic Organics, I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic/solvent management plan submitted to the NBC.

\_\_\_\_\_  
Signature of Authorized Company Representative

\_\_\_\_\_  
Date

**Report will be returned if form is not properly completed and signed.**

**NBC Field's Point Effluent Discharge Limitations**

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)	Parameter	Limitation (Max)
Arsenic(Total)	0.02**	Zinc (Total)	2.61
Cadmium (Total)	0.11	Total Toxic Organics (TTO)	2.13
Chromium (Total)	2.77	Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Copper (Total)	1.20	Total Suspended Solids (TSS)	300
Cyanide (Total)	0.58*	Total Oil and Grease (fats, oils and grease)	125
Lead (Total)	0.60	Total Nitrogen	115***
Mercury (Total)	0.005	Ammonia	50***
Nickel (Total)	1.62	pH range (at all times)	5.0 – 11.0 s.u.
Silver (Total)	0.43		

Mass Based Limitations (These limitations supersede those listed above for the specified categories)

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)	Converted Limitation (mg/L)
14	BOD <sub>5</sub> and TSS	5	600
23 and 29	BOD <sub>5</sub> and TSS	20	2400
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10	1200
33	BOD <sub>5</sub> and TSS	75	9000
33	Total Nitrogen	10***	1200
33	Ammonia	2***	240

\* This limitation only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l.

\*\* This limitation applies to all Industrial Users except the landfill which must meet 0.4 mg/l.

\*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1<sup>st</sup> through October 31<sup>st</sup>,



**The Narragansett Bay Commission**  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905

**Bucklin Point District**  
**Self-Monitoring Compliance Report**

Company Name: \_\_\_\_\_

Address of Premises Sampled: \_\_\_\_\_

Date(s) Sampled: \_\_\_\_\_

Permit Sampling Month Satisfied: \_\_\_\_\_

Samples Taken By: \_\_\_\_\_  
(Name) (Company)

Samples Analyzed By: \_\_\_\_\_  
(Company)

Type of Sample: Grab \_\_\_\_\_ Composite \_\_\_\_\_

If Grab Sample, what time(s) was sample taken? \_\_\_\_\_

If Composite Sample, describe how composite was taken \_\_\_\_\_

Where was sample taken? \_\_\_\_\_

Water Meter Readings (List readings for all meters discharging to sampling location)

	#1	#2	#3
Closing Reading:	_____	_____	_____
Opening Reading:	_____	_____	_____
Total:	_____	_____	_____
Units (Circle One):	Cubic Feet/Gallons	Cubic Feet/Gallons	Cubic Feet/Gallons
	Other (Specify):_____	Other (Specify):_____	Other (Specify):_____

Were any batch discharges sampled? \_\_\_\_\_ Yes \_\_\_\_\_ No

What tank was sample taken from? \_\_\_\_\_

Indicate volume of batch discharge: \_\_\_\_\_

Is this analysis a resampling required to demonstrate compliance with a previous violation?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

What is the sample identification number(s) or the analytical report identification number(s) indicated on the analytical report(s) being submitted? \_\_\_\_\_

Is this analysis in full compliance with NBC standards listed on the back of this form?  
\_\_\_\_\_ Yes \_\_\_\_\_ No

If your firm was in violation, what was the cause of the violation? \_\_\_\_\_

What steps will be taken by your firm to ensure full compliance with NBC standards on a continuous basis? \_\_\_\_\_

When will these steps be implemented? \_\_\_\_\_

If your firm is not in full compliance with the NBC standards, U.S. EPA Regulations, 40 CFR 403.12g (2) requires that you notify the NBC at 461-8848 within 24 hours of becoming aware of the violation and that your firm resample and analyze for the parameter(s) in violation of the NBC standards. The results after resampling must be submitted to the NBC no later than thirty (30) days following the date that you became aware of the initial violation of the standards.

Please attach the laboratory analysis sheet. Indicate on this sheet the method of analysis used for each parameter listed. Sampling and analysis shall be performed in accordance with the techniques prescribed by federal regulations (40 CFR, Part 136).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In lieu of monitoring for Total Toxic Organics, I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic/solvent management plan submitted to the NBC.

\_\_\_\_\_  
Signature of Authorized Company Representative

\_\_\_\_\_  
Date

**Report will be returned if form is not properly completed and signed.**

**NBC Bucklin Point Effluent Discharge Limitations**

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)	Parameter	Limitation (Max)
Arsenic(Total)	0.03	Zinc (Total)	1.67
Cadmium (Total)	0.11	Total Toxic Organics (TTO)	2.13
Chromium (Total)	2.77	Biochemical Oxygen Demand (BOD <sub>5</sub> )	300
Copper (Total)	1.20	Total Suspended Solids (TSS)	300
Cyanide (Total)	0.50*	Total Oil and Grease (fats, oils and grease)	125
Lead (Total)	0.69	Total Nitrogen	115**
Mercury (Total)	0.06	Ammonia	50**
Nickel (Total)	1.62*	pH range (at all times)	5.0 – 11.0 s.u.
Silver (Total)	0.40		

The following limitations supersede those listed above for the specified categories.

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)	Converted Limitation (mg/L)
14	BOD <sub>5</sub> and TSS	5	600
23 and 29	BOD <sub>5</sub> and TSS	20	2400
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10	1200
32	BOD	570	68,400
32	TSS	10	1200
33	BOD <sub>5</sub> and TSS	75	9,000
33	Total Nitrogen	10**	1200
33	Ammonia	2**	240

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1<sup>st</sup> through October 31<sup>st</sup>,



## TWENTY-FOUR (24) HOUR VIOLATION NOTIFICATION FAX FORM

**Fax To:** Narragansett Bay Commission – Pretreatment Section  
401.461.0170

**Company Name:** \_\_\_\_\_  
**Facility Address:** \_\_\_\_\_  
\_\_\_\_\_

This is to notify the Narragansett Bay Commission (NBC) that the above-referenced facility violated the NBC discharge limitations for the following parameter(s):

Sampling Date of Violation	Parameter	Concentration

I certify that I have just become aware of the above-referenced violation(s) within the past 24 hours and will immediately resample this waste stream for the parameter(s) exceeding the NBC discharge limitation(s). I certify under the penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information is, to the best of my knowledge and belief is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Initial sampling and all resampling results must be submitted within 30 days of the sample date. Please note, resampling must continue until four consecutive samples show compliance with NBC discharge limitations.

\_\_\_\_\_  
Signature of Authorized Agent

**CONTINUOUS DISCHARGE  
PH MONITORING REPORT**  
MONTH OF: \_\_\_\_\_ 20 \_\_\_\_



Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Return to: **Narragansett Bay Commission**  
**Pretreatment Section**  
**2 Ernest Street**  
**Providence, RI 02905**

Date	MAXIMUM pH	MINIMUM pH	AVERAGE pH (VISUAL)	VOLUME/WATER METER READING IF REQUIRED*	COMMENTS
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I certify the above data has been reported directly from the recording chart of the final pH recorder and is reported to an accuracy of 0.1 standard units.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
Title

\*INDICATE IF GALLONS OR CUBIC FEET

**BATCH DISCHARGE  
Ph MONITORING REPORT  
MONTH OF: \_\_\_\_\_ 20 \_\_\_\_**



Company Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Return to: **Narragansett Bay Commission**  
**Pretreatment Section**  
**2 Ernest Street**  
**Providence, RI 02905**

Date	Batch Discharge I		Batch Discharge II		Batch Discharge III		Batch Discharge IV		COMMENTS
	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

Please indicate the method used to measure pH: \_\_\_\_\_

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
Title

## Zero Process Wastewater Discharge Certification

For the Month of \_\_\_\_\_, 20\_\_

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN TO:**  
Narragansett Bay Commission  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905

I, \_\_\_\_\_, as authorized representative of \_\_\_\_\_, do hereby decree that no process wastewater was discharged into the Narragansett Bay Commission sewer system for the past six (6) month period.

Date of Meter Readings: \_\_\_\_\_

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date

**Attachment A**

**Zero Process Wastewater Discharge Certification**

For the Six (6) Month Period from

\_\_\_\_\_ to \_\_\_\_\_

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN TO:**  
Narragansett Bay Commission  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905-5502

I, \_\_\_\_\_, as authorized representative of \_\_\_\_\_, do hereby decree that no process wastewater was discharged into the Narragansett Bay Commission sewer system for the past six (6) month period.

Date of Meter Readings: \_\_\_\_\_

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date

**Attachment A**

**Best Management Practice Certification**

For the 12-month period from \_\_\_\_\_, 20\_\_ to \_\_\_\_\_, 20\_\_

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN TO:**  
Narragansett Bay Commission  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905-5502

I, \_\_\_\_\_, as authorized representative of  
\_\_\_\_\_, do hereby decree that the Narragansett Bay  
Commission Best Management Practices for the Management of Waste Dental Amalgam have been  
fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date

# NARRAGANSETT BAY COMMISSION SAMPLE SUBMISSION SHEET

SOURCE: \_\_\_\_\_ EMDA# \_\_\_\_\_ DATE: \_\_\_\_\_  
 STREET: \_\_\_\_\_ SAMPLER # \_\_\_\_\_ TIME: \_\_\_\_\_  
 CITY/STATE: \_\_\_\_\_ COLLECTED BY: \_\_\_\_\_  
 SAMPLE LOCATION: \_\_\_\_\_ FACILITY CONTACT: \_\_\_\_\_  
 INSTRUCTIONS: \_\_\_\_\_

## PARAMETERS FOR ANALYSIS\*

Cd _____	Ag _____	BOD (5 day) _____
Cr (Total) _____	Zn _____	TSS _____
Cr (Hex.) _____	Hg _____	FOG _____
Cu _____	CN (Total) _____	TPH _____
Pb _____	VOC _____	( ) _____
Ni _____	Ext _____	( ) _____

\*All analyses done according to 40 CFR part 136. Results reported in mg/l unless specified otherwise.

## FIELD AND PRESERVATION DATA

Sample Information					Preservation Chemicals Added								
Sample No.	Sample Time Start/Stop	Analyze For	Sample Type (G) or (C)	Initial pH	Nitric Acid (ml)	Hydro-Chloric Acid (ml)	Res. Cl (+) or (-)	Lead Acetate (+) or (-)	NaOH (ml)	Ascorbic Acid (g)	Other	Final pH	Sealed By
A													
B													
C													
D													
E													
F													
G													
H													
I													
J													
K													
L													
M													

Did user accept a split or replicate sample?

Sample	A	B	C	D	E	F	G	H	I	J	K	L	M	Signature
Yes														
No														

Meter Readings	Meter #1	Meter #2	Meter #3	Meter #4
Close				
Open				
Total	(c.f., gals)	(c.f., gals)	(c.f., gals)	(c.f., gals)

REMARKS \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**CHAIN OF CUSTODY**

Samples transferred by: \_\_\_\_\_  
 Samples received by: \_\_\_\_\_  
 DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

Samples transferred by: \_\_\_\_\_  
 Samples received by: \_\_\_\_\_  
 DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

Samples transferred by: \_\_\_\_\_  
 Samples received by: \_\_\_\_\_  
 DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

RESULTS REPORTED BY: \_\_\_\_\_  
 RESULTS REPORTED ON: \_\_\_\_\_

**DEFINITION OF AN AUTHORIZED AGENT**



An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the company's by-laws or per a vote of the directors if the company is a corporation; a general partner or proprietor if the company is a partnership or sole proprietorship respectively; or a duly authorized representative, the individual designated on the permit application or permit cover page, if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the company. Please complete the Designation Of Authorized Agent section below if you wish to designate additional authorized agents. The Narragansett Bay Commission will not accept documents signed by persons other than the company's authorized agent(s) or authorized representative(s).

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**DESIGNATION OF AUTHORIZED AGENT**

I, \_\_\_\_\_ certify that I am the \_\_\_\_\_ of  
\_\_\_\_\_ and that \_\_\_\_\_  
is authorized to make submittals to the Narragansett Bay Commission on behalf of \_\_\_\_\_  
\_\_\_\_\_ and that said submittals are duly signed for and  
in behalf of said corporation by authority of its governing body, and are within the scope of  
its corporate powers.

\_\_\_\_\_  
Corporate Seal

\_\_\_\_\_  
Signature of Corporation Official

\_\_\_\_\_  
Date

***NBC ONE-TIME COMPLIANCE  
REPORT FOR DENTAL FACILITIES***



Narragansett Bay Commission  
One-Time Compliance Report for Dental Facilities  
40CFR441.50 Dental Point Source Category

The United States Environmental Protection Agency (EPA) finalized the Dental Point Source Category (40CFR441) on July 14, 2017. This form must be completed under 40CFR441.50, which requires all dental facilities to complete and submit a one-time compliance report to the local Pretreatment Program.

Practice Name: \_\_\_\_\_

Premise Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Mailing Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List all dentists affiliated with this practice:

Name:	Email address:
_____	_____
_____	_____
_____	_____
_____	_____

Primary Contact for Practice: Name: \_\_\_\_\_  
Email Address: \_\_\_\_\_  
Phone Number: \_\_\_\_\_

Type(s) of Dentistry Performed:

General Dentistry	Yes _____	No _____
Orthodontics	Yes _____	No _____
Periodontics	Yes _____	No _____
Endodontics	Yes _____	No _____
Prosthodontics	Yes _____	No _____
Oral and Maxillofacial Surgery	Yes _____	No _____
Other (please detail)	_____	

This practice began operations prior to July 14, 2017 Yes \_\_\_\_\_ No \_\_\_\_\_

This practice places and/or removes dental amalgam on a regular or an infrequent basis:  
Yes \_\_\_\_\_ No \_\_\_\_\_

An ISO 11143 (or ANSI/ADA 108-2009) certified amalgam separator (or equivalent device) has been installed to capture amalgam bearing waste streams. Yes \_\_\_\_\_ No \_\_\_\_\_

Please provide the make and model of the amalgam separator:

Make: \_\_\_\_\_ Model: \_\_\_\_\_

Date the amalgam separator was installed: \_\_\_\_\_

An equivalent device has been installed at the facility: Yes \_\_\_\_\_ No \_\_\_\_\_

Please provide the make and model of the equivalent device:

Make: \_\_\_\_\_ Model: \_\_\_\_\_

Date the device was installed: \_\_\_\_\_

How many chairs are at this facility? \_\_\_\_\_

How many chairs are connected to the amalgam separator or equivalent device? \_\_\_\_\_

How many sinks (used for instrument washing) are connected to the amalgam separator or equivalent device? \_\_\_\_\_

I certify the amalgam separator or equivalent device is designed and is being properly maintained and operated in accordance with NBC Best Management Practices. Yes \_\_\_\_\_ No \_\_\_\_\_

Maintenance is performed by onsite personnel: Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, describe operation and maintenance procedures:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

A vendor has been contracted to operate and maintain the amalgam separator or equivalent: Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, provide the contact person, company name, address and phone number of your vendor:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If the amalgam separator or equivalent device that is presently installed needs to be replaced, an amalgam separator or equivalent device meeting the requirements of the NBC Best Management Practices for the Management of Waste Dental Amalgam (NBC BMP) as well as 40CFR441.30(a)(1) or 40CFR441.30(a)(2) must be installed. The amalgam separator must be ISO 11143 certified with a 99% removal rate or equivalent device must be installed.

The dental practice complies with the best management practices outlined in the NBC BMP and 40CFR441.30(b) or 40CFR441.40. These best management practices include but are not limited to:

- Waste amalgam including but not limited to dental amalgam from chair side traps, screen, vacuum pumps, filters, dental tools, cuspidors, or collection devices is strictly prohibited from being discharged to the sewer system.
- Elemental mercury is strictly prohibited from being discharged to the sewer system.
- All equipment that comes in contact with amalgam must be operated and maintained in accordance with manufacturers specifications.
- Equipment coming in contact with amalgam, including piping, must not be cleaned with oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine, and peroxide that have a pH lower than 6.0 standard units (su) or greater than 8.0 su. These types of cleaners may increase the dissolution of mercury.

### Certification Statement

As per 40CFR441.50(a)(2) this one-time compliance report must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental practice is a partnership or sole proprietorship, or a duly authorized representative in accordance with 40CFR403.12(l).

I am a responsible corporate officer, a general partner or proprietor (if the dental practice is a partnership or sole proprietorship), or a duly authorized representative in accordance with 40CFR403.12(l) of the above named dental practice, and certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Agent:

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Email Address

Date: \_\_\_\_\_

This One-Time Compliance Report must be maintained onsite and be available for review, either in physical or electronic form, during inspections as long as this dental practice is in operation or until there is a change in ownership.

***ATTACHMENT VOLUME I***

***SECTION 4***

***SAMPLE NBC ENFORCEMENT  
LETTERS, NOTICES, AND ORDERS***

NOTICE OF VIOLATION  
FAILURE TO SUBMIT PH MONITORING REPORT



December 31, 2025

Mr. Bradford Holmes  
Central Auto Radiator, Inc.  
188 Pine Street  
Pawtucket, RI 02860

Dear Mr. Holmes:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit pH results for the month(s) of:

**Sample Location # 1**  
November 2025

To date, the Commission has not received a copy of the above referenced pH monitoring report(s). Until a signed copy of the above referenced pH monitoring report(s) are received, you are in violation of the terms of your permit. Failure to submit pH monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in black ink, appearing to read "Meghan Healy".

Meghan Healy  
Pretreatment Inspector I

**Notice of Violation**  
**Failure to Immediately Report Violation**



June 25, 2025

Ms. Amanda Trozzi  
Aspen Aerogels Rhode Island, LLC  
3 Dexter Road  
East Providence, RI 02914

Dear Ms. Trozzi:

The Self-Monitoring Compliance report which was received by this office on June 24, 2025 indicated non-compliance with the NBC discharge limitations. EPA regulations, 40CFR. 403.12g(2), require that you notify the Narragansett Bay Commission (NBC) within 24 hours of becoming aware of this violation.

You failed to comply with this regulation since you did not notify the NBC within the 24 hour reporting period. This is not acceptable. In the future you must report any discharge violation within 24 hours by contacting me at 461-8848 or by using the attached FAX notification form.

In addition to notifying the NBC immediately regarding the violation, EPA regulations require that you repeat the sampling and analyses for the parameter(s) in violation and submit the resample results within thirty (30) days of becoming aware of the initial violation of the standards. Please note that the NBC requires that you begin weekly wastewater sampling for the parameter(s) in violation until such time that four (4) consecutive weekly sampling reports indicate full compliance with the NBC discharge limits. Failure to comply with these regulations and requirements may result in the initiation of enforcement action against your firm.

If you should have any questions regarding this matter, contact me at 461-8848 ext. 490.

Sincerely,

A handwritten signature in dark ink, appearing to read "ND", is positioned above the typed name.

Nathan P. Daggett  
Pretreatment Inspector IV

NOTICE OF VIOLATION  
FAILURE TO SUBMIT CERTIFICATION



October 01, 2025

Ms. C.J. Jimenez  
WVCB  
d/b/a The Steel Yard  
27 Sims Avenue  
Providence, RI 02909

Dear Ms. Jimenez:

In accordance with your permit issued by the Narragansett Bay Commission (NBC), it is necessary for you to submit a Certification for the month of:

August-2025

To date, the NBC has not received a copy of the above referenced certification. Until a signed copy of the above referenced certification is received, you are in violation of the terms of your permit. Failure to submit this Certification within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Songolo", is written over a faint circular stamp.

Rebecca J. Songolo  
Pretreatment Inspector I

December 16, 2025



Ms. Dulce Lopez Juarez  
Hazel Coffee Café  
2 Thomas Street – Unit 400  
Providence, RI 02903

**Certified Mail**  
**Return Receipt Requested**

9489 0090 0027 6765 6045 96

Dear Ms. Lopez Juarez:

It has come to my attention from the Narragansett Bay Commission (NBC) pretreatment staff that your company has failed to submit a Wastewater Discharge Permit Application and application fee, which have been overdue since August 10, 2025. Notices of Violation have been issued and have been presumably ignored by your firm.

This default is in violation of the NBC Rules and Regulations. The NBC has the authority to fine persons violating provisions of any permit, rule, regulation, or order and may assess an administrative penalty of up to twenty-five thousand (\$25,000) dollars per day for each violation.

Please be advised that if this matter is not satisfactorily addressed within thirty (30) days, enforcement action will follow. Should you have any questions regarding the NBC requirements of your firm, you should contact Travis H. Costa at 461-8848, ext. 490. Thank you for your anticipated cooperation.

Very truly yours,

Jaclyn Cotter, Esq.  
Associate Legal Counsel

JC:lp

cc: Travis H. Costa - NBC

NOTICE OF VIOLATION  
NOTICE OF PH VIOLATIONS



September 15, 2025

Mr. Peter Crowley  
271 Tockwotten Partners LLC  
271 Tockwotten Street  
Providence, RI 02903

Dear Mr. Crowley

I have reviewed the August pH Monitoring Report submitted on September 12, 2025. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

4

HIGH LIMIT VIOLATIONS

0

Effluent discharge to the Narragansett Bay Commission (NBC) sewer system must have a pH between the range of 5.0 - 11.0 standard units (s.u.) at all times. Discharging effluent with a pH value of less than 5.0 s.u. or higher than 11.0 s.u. is prohibited. pH effluent, that does not fall in the accepted range, may not be discharged to the NBC sewer system, even if the discharge is only for a short period of time. You must immediately take the steps necessary to prevent future violations from occurring. We will review future monitoring reports to ensure compliance with this parameter.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 262.

Please feel free to contact me at 461-8848 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jared Urban", with a long horizontal flourish extending to the right.

Jared Urban  
Pretreatment Inspector III

**NOTICE OF VIOLATION  
FAILURE TO SATISFY NBC REQUIREMENTS**



December 31, 2025

Mr. Jose Frias  
Main Street Market, Inc.  
919 Main Street  
Pawtucket, RI 02860

Dear Mr. Frias:

Per the requirements of letter(s) from this office, the following item(s) were required to be completed and/or submitted by the due date(s) indicated below:

<u>Required Submittal</u>	<u>Notice</u>	<u>Issue Date</u>	<u>Due Date</u>
Resampling Results for Total Oil & Grease (fats, oils, and grease)	Letter	10/7/2025	11/25/2025

You must immediately satisfy the past due Narragansett Bay Commission (NBC) requirements as detailed in the above referenced documents. Your failure to complete the aforementioned requirements within thirty (30) days from the specified due date will place your firm in Significant Non-Compliance (SNC) with NBC regulations and will automatically result in the publication of the name of your firm as a violator in the Providence Journal. Your continued failure to complete these requirements may result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative and civil penalties of up to \$25,000 per violation per day should an enforcement action be initiated.

If you should have any questions regarding this matter, contact me at 461-8848, ext. 490.

Sincerely,



Meghan Healy  
Pretreatment Inspector

MH:sm

NOTICE OF VIOLATION  
FAILURE TO SUBMIT COMPLIANCE REPORT



June 02, 2025

Mr. Peter Kelly  
Anchor Toffee LLC  
356 River Avenue  
Providence, RI 02908

Dear Mr. Kelly:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit compliance monitoring results for the month(s) of:

**Sample Location # 1**  
April-2025

To date, the Commission has not received a copy of these analytical results. Until a certified copy of the results and a Self-Monitoring Compliance Report are received, you are in violation of the terms of your permit. Failure to submit compliance monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Songolo", is written over a faint circular stamp.

Rebecca J. Songolo  
Pretreatment Inspector I

**NOTICE OF VIOLATION  
COMPLIANCE REPORT NOT SUBMITTED**



December 23, 2025

Ms. Sandra Gaboriault  
Bachini's Bakery  
345 York Avenue  
Pawtucket, RI 02860

Dear Ms. Gaboriault:

I have received and reviewed the November wastewater analysis you submitted on December 19, 2025.

A completed Self-Monitoring Compliance Report form was not submitted with the wastewater analysis. All analytical results submitted to the Commission must be accompanied by a completed Self-Monitoring Compliance Report. Please complete the enclosed form for the previously submitted analysis and return it to this office by January 18, 2026.

Sincerely,

A handwritten signature in black ink that reads "Alejandra Tobon". The signature is written in a cursive, flowing style.

Alejandra Tobon  
Pretreatment Inspector I

**NOTICE OF VIOLATION  
FAILURE TO MEET STANDARDS (NBC SAMPLE)**

December 15, 2025

Mr. Alfred Silva  
Chemart Company  
15 New England Way  
Lincoln, RI 02865



Dear Mr. Silva

Enclosed please find the results of the analyses performed by the Narragansett Bay Commission (NBC) Laboratory on a sample taken by the Bay Commission personnel at your facility on December 02, 2025. These results indicate that you are in violation of Narragansett Bay Commission (NBC) discharge limitations for the following:

**Sample Location # 1**

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit
12/2/2025	COPPER	Composite	6.343	EPA	3.38 mg/L
12/2/2025	COPPER	Composite	6.343	LOCAL	1.200 mg/L
12/2/2025	CYANIDE	Composite	4.070	EPA	1.20 mg/L
12/2/2025	CYANIDE	Composite	4.070	LOCAL	0.500 mg/L

As a condition of your Wastewater Discharge Permit, these discharge limitations must be met at all times. Failure to meet the standards may result in the Commission initiating enforcement action against your firm and the publication of your company's name in the Commission's annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Based upon these results, you must immediately resample your process discharge for the parameter(s) in violation noted above. You must continue this weekly sampling until four (4) consecutive weekly reports indicate full compliance with NBC discharge limitations. Results must be submitted for NBC review within three (3) weeks from the sampling date.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848.

Sincerely,



Kyle C. Gannon  
Pretreatment Inspector III

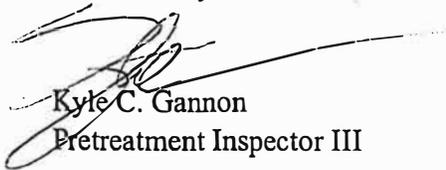
# WASTEWATER SAMPLE ANALYSIS



Company Name: Chemart Company  
Company Address: 11 New England Way  
Lincoln, RI 02865  
Location Name: Sample Location # 1  
Type of Sample: Composite  
Date of Sample: December 02, 2025

Parameter	Concentration (mg/l)
CADMIUM	0.015
CHROMIUM	0.075
COPPER	6.343
CYANIDE	4.07
LEAD	0.075
NICKEL	0.941
SILVER	0.025
ZINC	0.509

Reviewed By:

  
Kyle C. Gannon  
Pretreatment Inspector III

Notice of Violation  
Failure to Meet Standards (Manhole)



September 15, 2025

Mr. Frank DiFruscio  
DiFruscia Industries, Inc.  
20-A Starr Street  
Johnston, RI 02919

Dear Mr. DiFruscio:

The Narragansett Bay Commission (NBC) regularly conducts surveillance monitoring of its users. This monitoring is done by installing automatic samplers in manholes isolating that company. The samplers are programmed to collect composite samples of the wastewater discharging through the manhole.

On June 25, 2025 the NBC conducted surveillance manhole sampling of your facility. The analytical results from the upstream manhole indicate full compliance with NBC discharge limitations. The analytical results from the down stream manhole indicate noncompliance with the following parameters:

<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>
Copper	Composite	1.335	1.20
Nickel	Composite	4.241	1.62
Zinc	Composite	18.65	2.61

It has been determined that your firm is the sole source of the non-compliant wastewater since the upstream results were in full compliance. You must submit a report by October 15, 2025, detailing the cause of the high concentrations of copper, nickel and zinc and a proposal to ensure that wastewater from your facility is in compliance at all times.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact John Motta at 461-8848 ext. 471.

If you have any questions regarding this letter, please contact me at 461-8848 ext. 490.

Sincerely,



Nathan P. Daggett  
Pretreatment Inspector IV

Enclosure



## Manhole Sample Analysis

Company: DiFruscia Industries, Inc.

Address: 20-A Starr Street

Johnston, RI 02919

Date of Sample: June 25, 2025

Type of Sample: Composite

<u>Parameter</u>	<u>Upstream Manhole Concentration (mg/L)</u>	<u>Downstream Manhole Concentration (mg/L)</u>
Cadmium	<0.015	<0.015
Chromium	<0.075	1.474
Copper	0.03906	1.335
Cyanide	<0.004	0.0337
Lead	<0.075	<0.075
Nickel	<0.050	4.241
Silver	<0.025	<0.025
Zinc	0.2448	18.65
pH (standard units)	5.85	6.50

Reviewed by:

Kerry M. Britt  
Pretreatment Manager

NOTICE OF VIOLATION  
LETTER OF DEFICIENCY



November 20, 2025

Mr. Jean-Francois Persegol  
CBNA Barletta Phase IIIA CSO JV  
40 Shawmut Road  
Canton, MA 02021

**Certified Mail**  
**Return Receipt Requested**

91 7108 2133 3937 9708 5200

RE: CBNA Barletta Phase IIIA CSO JV – 804 School Street, Pawtucket, RI

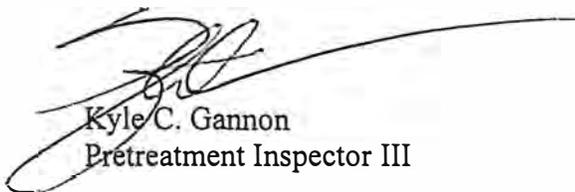
Dear Mr. Persegol:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of the above referenced site conducted on October 23, 2025. Mr. Brian Hann represented the facility. During the inspection, it was noted that the pretreatment system was removed without first submitting plans or receiving approval from the NBC. This is a violation of the terms of your Wastewater Discharge Permit. As stated in Section D(2) of your permit (copy enclosed), you are required to operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur. In addition, according to Section H (2) of your permit (copy enclosed), you must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact NBC at (401) 461-8848 ext. 471.

If you have any questions, please contact me at (401) 461-8848 ext. 490.

Sincerely,



Kyle C. Gannon  
Pretreatment Inspector III

KCG:rcf

Enclosures

NOTICE OF VIOLATION  
NOTICE OF PH VIOLATIONS



April 25, 2025

Mr. David Gambuto  
Contract Specialties, Inc.  
234 Hartford Avenue  
Providence, RI 02909

Dear Mr. Gambuto

I have reviewed the March pH Monitoring Report submitted on April 24, 2025. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

6

HIGH LIMIT VIOLATIONS

0

Effluent discharge to the Narragansett Bay Commission (NBC) sewer system must have a pH between the range of 5.0 - 11.0 standard units (s.u.) at all times. Discharging effluent with a pH value of less than 5.0 s.u. or higher than 11.0 s.u. is prohibited. pH effluent, that does not fall in the accepted range, may not be discharged to the NBC sewer system, even if the discharge is only for a short period of time. You must immediately take the steps necessary to prevent future violations from occurring. We will review future monitoring reports to ensure compliance with this parameter.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 262.

Please feel free to contact me at 461-8848 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Daggett", is written over a horizontal line.

Nathan P. Daggett  
Pretreatment Inspector IV

**NOTICE OF VIOLATION  
FAILURE TO MEET STANDARDS (USER SAMPLE)**



August 20, 2025

Mr. Michael Deltoro  
B. Deltoro & Sons, Inc.  
393 Harris Avenue  
Providence, RI 02909

Dear Mr. Deltoro

The sample results for July which were received by this office on August 18, 2025 indicate that you are in violation of discharge limitations for the following:

**Sample Location # 1**

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit
7/30/2025	TSS	Composite	164.167	LOCAL	75.000 Lbs/1000g

As a condition of your Wastewater Discharge Permit, these discharge limitations must be met at all times. Failure to meet the standards may result in the Commission initiating enforcement action against your firm and the publication of your company's name in the Commission's annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Based upon these results, you must immediately resample your process discharge for the parameter(s) in violation noted above. You must continue this weekly sampling until four (4) consecutive weekly reports indicate full compliance with NBC discharge limitations. Results must be submitted for NBC review within three (3) weeks from the sampling date.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848.

Sincerely,

Victoria Dinh  
Pretreatment Inspector II

NOTICE OF VIOLATION  
LETTER OF DEFICIENCY



August 26, 2025

Mr. William Christina  
LNP Enterprises, Inc.  
d/b/a Domino's  
P. O. Box 7632  
Warwick, RI 02887

RE: 887 North Main Street, Providence, RI

Dear Mr. Christina:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility conducted on August 12, 2025. During the inspection, the automatic grease removal unit (GRU) and the kitchen were inspected and the following deficiency was noted:

The GRU wheel assembly and timer unit would not function when tested, and no power was supplied to the GRU. As stated in Sections D(2) and D(3) of your permit (copy enclosed), the GRU shall be fully operational on a twenty-four (24) hour basis whenever kitchen operations are being conducted. The GRU with all associated strainers must be inspected every workday to determine whether the system is functioning normally or in need of cleaning, grease disposal, or any corrective measures. Therefore, your firm must service the unit and return it to proper working order by September 8, 2025. You must submit written notification that the work has been completed by September 22, 2025.

Failure to correct the aforementioned deficiencies can result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties of up to \$25,000 per violation per day.

If you have any questions regarding this matter or require further assistance, please contact me at (401) 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Dinh".

Victoria Dinh  
Pretreatment Inspector II

VD:lp

Enclosure













**NARRAGANSETT BAY COMMISSION**

**ADMINISTRATIVE ORDER # FP-01-25**

**IN THE MATTER OF:**

**NETTIE'S KETTLE CORN, LLC  
1789 SMITH STREET  
NORTH PROVIDENCE, RI 02911**

**AND**

**JOSEPH CLEMENTE AND  
LINDA ROSSI, DBA  
NETTIE'S KETTLE CORN  
1789 SMITH STREET  
NORTH PROVIDENCE, RI 02911**

**COMPLIANCE ORDER  
AND  
PENALTY ASSESSMENT**

**LEGAL AUTHORITY**

The following findings are made, and order issued pursuant to the authority vested in the Narragansett Bay Commission ("NBC") under Rhode Island General Laws ("R.I. Gen. Laws") Title 46 Chapter 25, the Narragansett Bay Commission Act ("the Act") as amended and the NBC Rules and Regulations for *Use of the Wastewater Facilities*, 835-RICR-20-00-1 ("Rules and Regulations"). The Act established the NBC to acquire, plan, construct, extend, improve, operate and maintain the sewerage system and treatment facilities in the district. The Act authorizes the NBC to establish a sewage pretreatment program and to enforce any violations of the Act and any rule, regulation, permit, or administrative order issued pursuant thereto. The Act authorizes the NBC to collect fees, charges, and assessments from any person so assessed. Further, the Act states that each person so assessed shall pay the fees, charges, or assessments within the time frame prescribed by the Rules and Regulations.

R.I. Gen. Laws § 46-25-25.2 provides that persons violating §§ 46-25-25 through 46-25-25.3 of the Act, or of any permit, rule, regulation, or order issued pursuant thereto shall be subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) per day for each violation and authorizes the NBC to obtain actual costs and reasonable attorney's fees incurred by the NBC in seeking compliance, penalties, or damages. Furthermore, R.I. Gen. Laws § 46-25-25.3 provides that any person found guilty of violating, willfully or with criminal negligence, any of the aforementioned provisions, or of any permit, rule, or regulation issued pursuant thereto shall be punished by a fine of not more than twenty-five thousand dollars (\$25,000) and/or imprisonment of not more than one year for each enumerated violation.

Section 1.10.1 of the Rules and Regulations prescribes that the NBC may implement administrative and/or judicial responses if a user is in violation of any provision of state or federal requirements, the Act, the Rules and Regulations, a permit, or an order issued by the NBC. Administrative penalties are assessed based on the penalty matrix contained in § 1.10.10 of the Rules and Regulations.

### **STATEMENT OF FACTS**

1. Nettie's Kettle Corn, LLC is a Rhode Island limited liability company, whose charter was revoked by the RI Secretary of State on or about February 14, 2022 ("Nettie's Kettle Corn").
2. Mr. Joseph Clemente ("Clemente") and Ms. Linda Rossi ("Rossi") are the owners and operators of Nettie's Kettle Corn, located in North Providence, that conducts commercial food preparation operations that discharge process wastewater containing pollutants into the NBC's facilities.
3. Clemente and Rossi both reside in North Providence, RI.
4. Clemente, Rossi and Nettie's Kettle Corn are users of the NBC's facilities as defined by the Rules and Regulations, § 1.2.
5. In accordance with the Act and the NBC's Rules and Regulations, the NBC issued Wastewater Discharge Permit #P8102-269-1028 ("Permit") to Nettie's Kettle Corn, Clemente and Rossi (collectively "Permittee") on or about October 19, 2023 authorizing the Permittee to discharge into the NBC's facilities so long as the Permittee adhered to the conditions of its permit and complied with the Rules and Regulations.
6. On or about September 26, 2023, NBC personnel conducted an inspection of Nettie's Kettle Corn. Said inspection revealed that the grease removal unit ("GRU" and/or "Grease Trap") was not functioning properly and was not being properly operated or maintained, and that Permittee was not maintaining a GRU logbook. On or about September 28, 2023, a Notice of Violation ("NOV") was issued to Permittee requiring the cleaning and repair of the GRU, submission of a written confirmation once complete, and requiring Permittee to maintain a GRU logbook in accordance with the Permit.
7. On or about September 17, 2024, NBC personnel conducted another inspection of Nettie's Kettle Corn. During this inspection, the GRU was again not functioning properly and was not being properly operated or maintained, and the required logbook was unavailable for review. Permittee was required to clean and repair the GRU, submit a written confirmation once complete, and maintain a GRU logbook in accordance with the Permit.
8. On or about October 18, 2024, NBC personnel conducted another inspection of Nettie's Kettle Corn. During this inspection, the GRU was again not functioning properly and was

not being properly operated and maintained, and the required logbook was unavailable for review. Permittee was again required to clean and repair the GRU and maintain a GRU logbook in accordance with the Permit.

9. Numerous NOVs were issued to Permittee between October 31, 2023, and September 2, 2025, for failure to submit written confirmation of the repair of the GRU (see Attachment I). During that same period numerous phone calls were made reminding Permittee of the outstanding submission. As of the date of this Administrative Order, written confirmation of the repair remains outstanding.
10. In accordance with the Permit and Rules and Regulations, Permittee is required to collect samples every April and October, analyze the samples for total oil and grease and timely submit self-monitoring compliance reports (“SMCRs”) and analytical results to the NBC.
11. Numerous NOVs were issued to Permittee between December 1, 2023, and September 2, 2025, for failure to timely submit the required SMCRs and analytical results (see Attachment II). During this time the NBC made numerous phone calls reminding Permittee of the outstanding submissions. As of the date of this Administrative Order, the analytical results and SMCRs for April 2025 remain outstanding.
12. On or about April 16, 2024, Clemente and Rossi were issued a certified notice requiring their attendance at a May 7, 2024, mandatory meeting at the NBC. Clemente and Rossi failed to attend the meeting.
13. The NBC’s legal department sent correspondence to Permittee on or about January 24, 2024, and September 4, 2024, advising Permittee that its continued noncompliance would result in an escalated enforcement action and the assessment of an administrative penalty.

**THEREFORE, based on the above findings, NETTIE’S KETTLE CORN, CLEMENTE AND ROSSI are hereby notified of the following violations:**

**Violation A: Failure to properly operate and maintain the GRU.**

**Violation B: Failure to maintain a required GRU logbook.**

**Violation C: Failure to timely submit Self-Monitoring Compliance Reports and analytical results.**

**THE FOLLOWING LAWS AND REGULATIONS APPLY  
TO THE ABOVE VIOLATIONS:**

*(The citations listed below represent only selected excerpts from  
the referenced statutes, codes, rules and regulations. Actual  
documents should be consulted for complete texts.)*

**EPA - CODE OF FEDERAL REGULATIONS**

**40 CFR § 403.2 Objectives of general pretreatment regulations**

By establishing the responsibilities of government and industry to implement National Pretreatment Standards this regulation fulfills three objectives:

- (a) To prevent the introduction of pollutants into POTWs which will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge;
- (b) To prevent the introduction of pollutants into POTWs which will pass through the treatment works or otherwise be incompatible with such works; and
- (c) To improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.

**40 CFR § 403.8 Pretreatment Program Requirements: Development and Implementation by POTW.**

(f) *POTW pretreatment requirements.* A POTW pretreatment program must be based on the following legal authority and include the following procedures. These authorities and procedures shall at all times be fully and effectively exercised and implemented.

(1) *Legal authority.* The POTW shall operate pursuant to legal authority enforceable in Federal, State or local courts, which authorizes or enables the POTW to apply and to enforce the requirements of sections 307 (b) and (c), and 402(b)(8) of the Act and any regulations implementing those sections. Such authority may be contained in a statute, ordinance, or series of contracts or joint powers agreements which the POTW is authorized to enact, enter into or implement, and which are authorized by State law. At a minimum, this legal authority shall enable the POTW to:

- (i) Deny or condition new or increased contributions of pollutants, or changes in the nature of pollutants, to the POTW by Industrial Users where such contributions do not meet applicable Pretreatment Standards and Requirements or where such contributions would cause the POTW to violate its NPDES permit;

(ii) Require compliance with applicable Pretreatment Standards and Requirements by Industrial Users;

(iii) Control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under § 403.3(v), this control shall be achieved through individual permits or equivalent individual control mechanisms issued to each such User except as follows.

(B) Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions:

(4) Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

(iv) Require

(A) the development of a compliance schedule by each Industrial User for the installation of technology required to meet applicable Pretreatment Standards and Requirements and

(B) the submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance by Industrial Users with Pretreatment Standards and Requirements, including but not limited to the reports required in § 403.12.

(v) Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users. Representatives of the POTW shall be authorized to enter any premises of any Industrial User in which a Discharge source or treatment system is located or in which records are required to be kept under § 403.12(o) to assure compliance with Pretreatment Standards. Such authority shall be at least as extensive as the authority provided under section 308 of the Act;

(vi)(A) Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement. All POTW's shall be able to seek injunctive relief for noncompliance by Industrial Users with Pretreatment Standards and Requirements. All POTWs shall also have authority to seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.

**40 CFR § 403.12 Reporting requirements for POTW's and industrial users.**

(h) *Reporting requirements for Industrial Users not subject to categorical Pretreatment Standards.* The Control Authority must require appropriate reporting from those Industrial Users with Discharges that are not subject to categorical Pretreatment Standards. Significant Non-categorical Industrial Users must submit to the Control Authority at least once every six months (on dates specified by the Control Authority) a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority. In cases where a local limit requires compliance with a Best Management Practice or pollution prevention alternative, the User must submit documentation required by the Control Authority to determine the compliance status of the User. These reports must be based on sampling and analysis performed in the period covered by the report, and in accordance with the techniques described in 40 CFR part 136 of this chapter and amendments thereto. This sampling and analysis may be performed by the Control Authority in lieu of the significant non-categorical Industrial User. For Industrial Users for which EPA or the authorized state, tribe, or territory is the Control Authority, as of December 21, 2025 or an EPA-approved alternative date (see 40 CFR 127.24(e) or (f)), all reports submitted in compliance with this section must be submitted electronically by the industrial user to the Control Authority or initial recipient, as defined in 40 CFR 127.2(b), in compliance with this section and 40 CFR part 3 (including, in all cases, subpart D to part 3), 40 CFR 122.22, and 40 CFR part 127. 40 CFR part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of 40 CFR part 127, the Industrial Users for which EPA or the authorized state, tribe, or territory is the Control Authority may be required to report electronically if specified by a particular control mechanism or if required to do so by state law.

(o) *Record-keeping requirements.*

(1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section, including documentation associated with Best Management Practices. Such records shall include for all samples:

(i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;

(ii) The dates analyses were performed;

- (iii) Who performed the analyses;
- (iv) The analytical techniques/methods use; and
- (v) The results of such analyses.

(2) Any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with Best Management Practices) shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.

(3) Any POTW to which reports are submitted by an Industrial User pursuant to paragraphs (b), (d), (e), and (h) of this section shall retain such reports for a minimum of 3 years and shall make such reports available for inspection and copying by the Director and the Regional Administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

### **GENERAL LAWS OF RHODE ISLAND**

#### **General Powers: § 46-25-5:**

- (10) To establish a sewage pretreatment program, and to require as a condition, to the grant or reissuance of any approval, license, or permit required under the program, that the person applying for the approval, license, or permit, pay to the commission a reasonable fee based on the cost of reviewing and acting upon the application and based on the costs of implementing the program. . . .
- (16) To issue orders of general or specific applicability to carry out the purposes of the project.
- (17) To have and exercise all powers necessary or convenient to effect its purposes.
- (18) To impose administrative penalties in accordance with the provisions of § 46-25-25.4.

**Orders as to Pretreatment of Sewage: § 46-25-25:**

(a) Without limiting the generality of the foregoing, the authority hereby vested in the commission shall include the authority to limit, reject, or prohibit any direct or indirect discharge of pollutants or combination of pollutants, as defined by applicable federal or state law, into the facilities of the project; to require that any person or class of user shall cause pollutants from his or her property, prior to their entry into the facilities of the project, to be submitted to such pretreatment standards and requirements as the commission may prescribe by rule or regulation. The commission shall prescribe such rules and regulations for pretreatment as in the opinion of the commission:

- (1) Are required by applicable federal or state law,
- (2) Are required under the terms of the project's federal permit(s), or
- (3) Are necessary and appropriate for the project.

(b) The commission shall have the authority to issue or deny permits to any person for the direct or indirect discharge of any pollutants into the facilities of the project; to require the development of a compliance schedule by each person to insure compliance with such pretreatment as the commission may prescribe. No person shall discharge any pollutant into the facilities, except as in compliance with the provisions of this section, and any rules and regulations promulgated hereunder, and pursuant to the terms and conditions of a permit.

(c) The commission may, by regulation, order, permit, or otherwise require any person who discharges into the facilities of the project to:

- (1) Establish and maintain such records;
- (2) Make such reports;
- (3) Install, calibrate, use, and maintain such monitoring equipment or methods, including where appropriate, biological monitoring methods;
- (4) Sample such discharges and effluents, in accordance with such methods, at such locations, at such intervals, and in such manner as the commission shall prescribe; and
- (5) Provide such other information relating to discharges into the facilities of the project as the commission may reasonably require to insure compliance with prescribed pretreatment. The information shall include, but not be limited to, those records, reports, and procedures required by applicable federal law.

(d) Notwithstanding any other provision of this section, the commission shall have the authority, and shall prescribe the appropriate procedures, after informal notice to the discharger, immediately and effectively to halt or prevent any discharge of pollutants into

the facilities of the project which reasonably appears to present an imminent endangerment to the health or welfare of persons. . . .

**Inspection powers: § 46-25-25.1:**

(a) The commission is authorized to carry out all inspection, surveillance, and monitoring procedures necessary to determine, independent of information supplied by any person who discharges into the facilities of the project, compliance or noncompliance by the person with the pretreatment requirements prescribed by the commission.

(b) The commission or the duly authorized employees and agents of the commission, upon presenting identification and appropriate credentials, are authorized:

(1) To enter, without delay and at reasonable times, those premises (public or private) of any person or class of user, either receiving services from the commission or applying to services from the commission, in which a discharge source or treatment system is located or in which records required to be maintained pursuant to § 46-25-25, are kept;

(2) During regular working hours and at other reasonable times, and within reasonable limits and in a reasonable manner, to have access to and to copy any records, inspect any monitoring equipment or method required pursuant to § 46-25-25, and sample any effluents which the owner or operator of the discharge source is required to sample under § 46-25-25, and any rules and regulations adopted pursuant thereto.

(c) Any person obstructing, hindering, or in any way causing to be obstructed or hindered the commission or any of its employees or agents in the performance of their duties, or who shall refuse to permit the commission or any of its employees or agents entrance into any premises, buildings, plant, or equipment, or other places belonging to or controlled by the person, in the performance of his or her duties as such, shall be subject to the civil and criminal penalties set forth in §§ 46-25-25.2 and 46-25-25.3.

**Civil penalties: § 46-25-25.2:**

(a) Any person who shall violate the provisions of §§ 46-25-25 – 46-25-25.3, or of any permit, rule, regulation, or order issued pursuant thereto, shall be subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) per day for each violation.

(b) The commission shall, in the same manner as cities and towns authorized under the provisions of § 45-6-2.3(a)(4), issue regulations to obtain actual costs and reasonable attorney's fees incurred by the commission in seeking compliance, penalties, or damages.

**Enforcement authority and procedure: § 46-25-25.4:**

(a) The commission shall have authority to seek legal or equitable relief in the federal court or in the superior court of Providence county to enforce the requirements of §§

307(b) and (c), 402(b)(8) and other applicable sections of the Federal Water Pollution Control Act, also known as the Clean Water Act, 33 U.S.C. § 1251 et seq., and any regulations implementing those sections or authorized by this chapter and/or by chapter 12 of this title. Whenever, on the basis of any information available to the commission, the commission has reasonable grounds to believe that a person has violated any provision of §§ 46-25-25 through 46-25-25.6 or any permit, rule, regulation or order issued pursuant thereto the commission may institute administrative, civil or criminal proceedings in the name of the commission. The commission shall not be required to enter into any recognizance or to give surety for costs prior to instituting such proceedings. The commission has the authority to order any person who violates any provision of §§ 46-25-25 through 46-25-25.6, any permit, rule, regulation or order issued pursuant thereto to cease and desist the violation, or to remedy the violation and to impose administrative penalties.

## **NBC'S RULES AND REGULATIONS FOR THE USE OF THE WASTEWATER FACILITIES**

### **SECTION 1.5            Discharge Requirements, Limitations, and Prohibitions**

#### **1.5.1 Authority**

The NBC may limit, reject or prohibit any direct or indirect discharge of pollutants or combination of pollutants, as defined by applicable Federal or State law or as described below, into the facilities. The NBC may, in its discretion, affix labels to those tanks which contain substances which are prohibited from being discharged to the facilities or which may not be discharged to the facilities without adequate pretreatment.

### **SECTION 1.7            Inspection Powers**

#### **1.7.1 General Powers**

- A.     Inspections shall be conducted at the discretion of the NBC. Duly authorized employees and agents of the NBC, upon presenting identification and appropriate credentials, are authorized:
1.     To enter without delay and at reasonable times those premises (public or private) of any person or class of user either receiving services from the NBC or applying for services from the NBC in which a discharge source or treatment system is located or which records required to be maintained pursuant to R.I. Gen. Laws § 46-25-25 are kept;
  2.     During regular working hours and at other reasonable times, and within reasonable limits and in a reasonable manner, to have access to and to copy any records, inspect any monitoring equipment or method required pursuant to R.I. Gen. Laws § 46-25-25 and sample and/or analyze any effluents which the owner or operator of such

discharge source is required to sample and/or analyze under R.I. Gen. Laws § 46-25-25 and any Rules and Regulations adopted pursuant thereto; and

3. During such on-site inspections, to carry out all inspections, surveillance, and monitoring procedures necessary to determine, independent of information supplied by any person discharging into the facilities, compliance or noncompliance with NBC pretreatment requirements.

### **1.7.2 User Documentation**

- A. The NBC may, by regulation, order, permit, or otherwise, require any person who discharges into the facilities to:
  1. Establish and maintain records;
  2. Make reports;
  3. Install, calibrate, use and maintain monitoring equipment or methods (including where appropriate, biological monitoring methods);
  4. Sample and/or analyze discharges and effluents (in accordance with the method, at the locations, at the intervals, and in the manner as the NBC shall prescribe); and/or
  5. Provide other information relating to discharges into the facilities of the project as the NBC may reasonably require to ensure compliance with prescribed pretreatment. Such information shall include, but not be limited to, those records, reports and procedures required by applicable State and Federal law.

## **SECTION 1.8 Wastewater Discharge Permit System**

### **1.8.2 Compliance Required**

No permit holder shall discharge industrial wastewater in excess of the quantity, rate of discharge, concentrations, or any other limits specified in the permit. Any person desiring to modify his or her permit must first apply for an amended permit.

### **1.8.5 Permit Conditions**

- A. Wastewater discharge permits shall be expressly subject to specific permit provisions contained therein as well as to provisions of this Part and all other regulations, user charges, and fees established by the NBC. Wastewater discharge permits may include such conditions as are reasonably deemed necessary by the NBC to prevent Pass Through or Interference, protect the quality of the water body receiving the treatment plant's effluent, protect worker health and safety, facilitate sludge management and disposal, protect ambient air quality, and protect against damage to the NBC's facilities. Such conditions may include, but are not limited to, the following:

1. The average and maximum wastewater constituents and characteristics permitted in the process water discharges;
2. Limits on rate and time of discharge or requirements for flow regulation and equalization;
3. Requirements for installation of inspection and sampling facilities and specifications for self-monitoring;
4. Requirements for the submission of periodic self-monitoring compliance reports, which shall include, but not be limited to, volume or rates of flow, concentrations of controlled pollutants, or other information that relates to the generation of waste;
5. Requirements for maintaining and submitting technical reports and plant records relating to wastewater discharges;
6. Daily average and daily maximum discharge rates, or other appropriate conditions when pollutants subject to limitations and prohibitions are proposed or present in the user's wastewater discharge permit;
7. Compliance schedules;
8. Requirements for installation of pretreatment systems, spill and slug-prevention control plans and solvent-management plans;
9. Provisions for authorized NBC employees and agents to enter and inspect the premises, including provisions for copying records, inspecting monitoring equipment and sampling effluent;
10. Compliance with Federal, State, and other governmental laws, Rules, and Regulations;
11. Fees and costs including supplemental fees assessed because of the special nature of the user's effluent in accordance with the provisions of § 1.5 of this Part and additional costs and fees based on the costs of enforcing these Regulations or the permit, in accordance with R.I. Gen. Laws § 46-25-5(10);
12. Signatory requirements; and
13. Any other reasonable conditions necessary to ensure compliance with the provisions of R.I. Gen. Laws § 46-25-1 et seq., or any State and Federal laws, Rules, and Regulations.

#### **1.8.6 General Pretreatment Requirements**

- A. Users shall provide wastewater treatment as required to comply with this Part, and shall achieve compliance with all Federal, State, and NBC pretreatment standards within the

time limitations specified by the Federal, State, and/or NBC pretreatment Regulations. Any equipment or systems required to pretreat wastewater to a level acceptable to the NBC shall be provided, operated, and maintained at the user's expense. The user is responsible for following all equipment instructions provided by the manufacturer. Detailed plans showing the pretreatment equipment, systems, and operating procedures shall be submitted to the NBC for review and shall be acceptable to the NBC prior to construction and operation of the facilities. The design of industrial process wastewater treatment systems must be executed in accordance with R.I. Gen. Laws Chapter 5-8. The following paragraphs set out the minimum requirements for pretreatment and water using process plans. The NBC may require additional documentation and/or detail of plans whenever it determines that such information is necessary to evaluate the pretreatment system or process operations.

- B. Any review and inspection conducted by the NBC is for the sole purpose of determining compliance with the technical provisions of these Regulations. The NBC does not assume responsibility for means, methods, or techniques used, or for the safety of construction work, the site, or for compliance by users with applicable laws and Regulations other than this Part.
- C. Review by the NBC does not constitute any form of guarantee or insurance with respect to the performance of the equipment and processes. The review of such plans and operating procedures will in no way relieve the user from the responsibility of modifying the equipment as necessary to produce an effluent acceptable to the NBC under the provisions of this section. Any subsequent significant changes in the pretreatment equipment or method of operation shall be reported to and be acceptable to the NBC prior to the user's initiation of the changes.

### **1.8.8 Grease Removal Systems**

- A. Grease removal systems must be installed at all connections to the NBC's Facilities from users conducting food preparation or food processing operations including, but not limited to, restaurants, nursing homes, schools, hospitals, or other connections which discharge or have the potential to discharge quantities of grease to the NBC's Facilities in excess of allowable standards. Installation of a grease removal system shall be required when the NBC determines that such discharge or accumulations of grease could result in obstruction to flow in the sewer. Grease removal systems must be installed according to the following specifications:
  - 1. No wastewater, other than from kitchen fixtures or food processing equipment, shall discharge into the grease removal system unless first approved by the NBC in writing. Wastewater from sanitary sources such as toilets and bathroom sinks is prohibited from being discharged to the grease removal system.
  - 2. Any user required to install a grease removal system must install either:
    - a. An outdoor passive in-ground grease interceptor, or

- b. An automatic electrical/mechanical grease removal unit.
3. In-ground grease removal systems shall have a minimum depth of four feet (4') and a minimum capacity of five hundred (500) gallons, and shall have sufficient capacity to provide at minimum a twenty-four (24) hour detention period for the process flow. The minimum process flow shall be based on fifteen (15) gallons per seat or chair per day or based upon actual water usage for existing facilities.
4. A suitable sampling location shall be provided for sampling of the discharges from grease removal systems. Any plans for such grease removal systems as required in this section shall be submitted for NBC review and approval prior to installation. All automatic electrical/mechanical grease removal systems must have a sampling valve installed on the discharge piping with a minimum clearance of eight inches (8") for the installation of sampling bottles.
5. The owner(s) shall be responsible for cleaning and maintaining the grease removal system(s) and shall maintain records of the dates of cleaning and means of disposal, subject to review by the NBC. Any removal and hauling of the collected materials not performed by the owner(s) must be performed by licensed waste disposal firms.
6. All wastewater from food preparation operations and/or washing and clean-up operations, including, but not limited to, pot sinks, pre-rinse stations, work stations, soup kettles, braising pans, mop sinks and wastewater generated from exhaust fan hood cleaning operations must discharge to the grease removal device. All automatic dishwasher wastewater, excluding pre-rinse stations, must bypass the grease removal device and be discharged directly into the sewer system.
7. Garbage disposal units may only be installed in facilities with properly sized and operational in-ground passive type grease interceptors which have been properly designed for retention of settleable solids. Garbage disposal units are prohibited in all other commercial or industrial facilities. Garbage disposal waste shall not be discharged into automatic electrical/mechanical type grease removal systems.

## **SECTION 1.9 Wastewater Monitoring and Reporting**

### **1.9.1 Records and Monitoring**

- A. All users who discharge or propose to discharge wastewater directly or indirectly to the facilities shall maintain records that substantiate any information supplied in permit applications. Such records shall include, but not be limited to, pH tapes, chemical usage data, log sheets, hazardous waste manifests, water meter readings, effluent monitoring reports, self-monitoring compliance reports and any other informational requirements of this Part or required by a user's wastewater discharge permit or any applicable State and Federal laws and Regulations. These records are to be kept for a period of three (3) years unless there is a pending dispute or pending litigation involving the subject of these records, in which case these records are to be kept for a period of three (3) years following resolution of such dispute or litigation.

### 1.9.3 Monitoring And Analysis of Process Wastewater

A. Sampling and analysis of industrial wastewater for the purpose of compliance determinations with respect to § 1.5 of this Part shall be done through industry self-monitoring and through monitoring performed by the NBC. All analyses, including sampling results submitted in support of any application reports, evidence, or as required by any permit or order shall be performed in accordance with the techniques prescribed in 40 C.F.R. Part 136 (2018) incorporated herein by reference, not including later amendments, or, if 40 C.F.R. Part 136 (2018) does not contain sampling or analytical techniques for the pollutant in question, in accordance with procedures approved by EPA. The NBC may, at its sole discretion, require any user to monitor for any parameter which may pose a public health risk, may adversely impact NBC facilities, cause treatment plant process Interference or Pass through, and/or impact receiving water quality, including but not limited to, any new pollutants such as emerging pollutants of concern, which include, but are not limited to, PFAS compounds, pharmaceuticals, etc. The NBC may, at its discretion, require an independent laboratory to conduct the sampling and analysis at the user's own cost.

#### 1. Self-Monitoring Requirements

- a. Self-monitoring results must be accompanied by a certified laboratory analysis sheet, indicating the EPA approved test procedure for each parameter analyzed. The user must also submit a self-monitoring report with the results on a form prescribed by the NBC.
- b. All Self-Monitoring Reports must be signed and certified in accordance with § 1.9.10 of this Part.
- c. If any sampling performed by a user indicates any violation(s) of discharge limitations, the user shall notify the NBC within twenty-four (24) hours of becoming aware of the violation(s). The user shall repeat the analysis immediately for the parameters determined to be in violation and submit the resampling results to the NBC within thirty (30) days after becoming aware of the violation(s).

#### 2. Sample Collection

- a. Except as indicated in § 1.9.3(A)(3) of this Part below, wastewater samples collected for the purpose of determining user compliance with pretreatment standards and requirements must be obtained using flow proportional composite sample collection techniques. In the event that flow proportional sampling is not feasible, the NBC may authorize the use of time proportional sampling.
- b. For automatic samplers, the intake line hose must be at least one quarter inch (1/4") (0.6 cm) internal diameter and the velocity in the intake line must be maintained at least at two feet (2') per second.

- c. Samples for oil and grease, temperature, pH, cyanide, phenols, toxicity, sulfides, and volatile organic chemicals must be obtained using a grab sample.
3. Analysis of Wastewater Samples

Laboratory analysis and sample preservation of industrial wastewater samples for user self-monitoring and compliance monitoring by the NBC shall be performed in accordance with EPA approved methods. Where applicable, the laboratory must be certified by the State in which it is located.

## **SECTION 1.10 Enforcement**

### **1.10.1 Administrative Enforcement Options**

- A. The NBC may implement any combination of the following administrative and/or judicial responses if a user is in violation of any provision of State or Federal requirements, R.I. Gen. Laws Chapter 46-25, this Part, a permit, or an order issued by the NBC.
  1. Issue a Notice of Violation;
  2. Require the user to attend a mandatory compliance meeting at the NBC Corporate Office during business hours, or at any other reasonable time, to discuss its violations or alleged violations, the remedial actions that it might take, and the actions the NBC might take under the Act and this Part;
  3. Issue an Administrative Order requiring any action that the NBC is authorized to require;
  4. Enter into a Consent Order or Settlement Agreement with the user;
  5. Revoke, modify, deny, suspend, or refuse to renew a permit issued under the Act;
  6. Terminate or suspend sewer services provided to the user;
  7. Assess a civil administrative penalty;
  8. Institute a court action for civil penalties, criminal fines and/or other criminal punishment, injunctive relief, reimbursement of costs and/or damages resulting from a violation or threatened violation; and/or any other relief authorized by law or Regulation.

## ORDER

**THEREFORE, based on the above findings and violations, NETTIE'S KETTLE CORN, CLEMENTE, and ROSSI are hereby ORDERED to:**

- 1. Repair the GRU and submit certification of the same within twenty-one (21) days of receipt of this Order.**
- 2. Within ten (10) days of receipt of this Order, collect a sample from the sample port on the discharge pipe of the automatic grease removal unit, sample location #1 and analyze the sample for total oil and grease, and submit the analytical results and SMCR to the NBC within thirty (30) days of the sample collection date.**
- 3. Immediately implement steps to ensure timely submission of all future analytical results and SMCRs.**
- 4. Immediately create and begin maintaining a GRU logbook in accordance with the Permit.**
- 5. Pay an Administrative Penalty to the NBC of Six Thousand and 00/100 dollars (\$6,000) within twenty-one (21) days of receipt of this Order.**

Pursuant to R.I. Gen. Laws §§ 46-25-25(d) and 42-17.1-2(21) and Section 1.10 of the Rules and Regulations, Nettie's Kettle Corn, and Clemente and Rossi have the right to file a written request with the Executive Director for a hearing on said alleged violations within twenty (20) days of service of this notice to show cause why they should not be found in violation of the Rules and Regulations and why enforcement action should not be taken against them. If a hearing is requested within the twenty (20) day time period, the NBC shall provide written notice to Nettie's Kettle Corn, and Clemente and Rossi of the date, time, and place for the hearing. If Nettie's Kettle Corn, and Clemente and Rossi fail to request a hearing within the aforementioned time frame, this Order shall automatically become an immediate compliance order and Nettie's Kettle Corn, and Clemente and Rossi shall be deemed to have waived the right to an adjudicatory hearing on the above cited violations.

**IF NETTIE'S KETTLE CORN, AND CLEMENTE AND ROSSI WAIVE THEIR RIGHT TO AN ADMINISTRATIVE HEARING WITHIN TWENTY (20) DAYS AND FAIL TO COMPLY WITH THE REQUIREMENTS LISTED IN THE ABOVE ORDER, THEN NETTIE'S KETTLE CORN, AND CLEMENTE AND ROSSI ARE DEEMED TO BE IN DEFAULT AND THE NBC MAY IMMEDIATELY TAKE STEPS TO PREVENT ANY FURTHER FLOW FROM ENTERING THE FACILITIES. SAID STEPS MAY INCLUDE, BUT ARE NOT LIMITED TO, SEALING AND/OR PLUGGING OF THE CONNECTION AT THE POINT OF NETTIE'S KETTLE CORN'S CONNECTION TO THE FACILITIES. THE EXECUTIVE DIRECTOR OR HER DESIGNEE MAY FOR GOOD CAUSE SHOWN DEFER ANY OF THE COMPLIANCE DATES PRESCRIBED HEREIN. BE ADVISED THAT FAILURE TO COMPLY WITH THE TERMS OF THIS ORDER MAY SUBJECT NETTIE'S KETTLE CORN, AND CLEMENTE AND ROSSI**

TO CIVIL AND/OR CRIMINAL PENALTIES OF UP TO \$25,000 PER DAY PER VIOLATION PURSUANT TO R.I. GEN. LAWS §§ 46-25-25.2 AND 46-25-25.3.

FOR THE NARRAGANSETT BAY COMMISSION

09/26/2025  
Date

Holly R. LaFong  
Holly R. LaFong, Esquire  
Chief Legal Counsel

**CERTIFICATION**

I hereby certify that on the 26<sup>th</sup> of September, 2025, true and accurate copies of the within ADMINISTRATIVE ORDER AND PENALTY ASSESSMENT were sent by certified mail, return receipt requested to the following individual:

1. Nettie's Kettle Corn, LLC  
Joseph Clemente  
Linda Rossi  
1789 Smith Street  
North Providence, RI 02911

Joseph Clemente  
31 Peach Hill Ave.  
North Providence, RI 02911

Linda Rossi  
612 Smithfield Rd.  
Unit A2  
North Providence, RI 02904

09/26/2025  
Date

Laurie Jean  
Laurie Jean  
Legal Administrative Assistant

**ATTACHMENT I**

**Failure to Satisfy NBC Requirements:**

<b>Required Submittal</b>	<b>Issue Date</b>	<b>Due Date</b>	<b>NOVs Issued</b>	<b>Status</b>
Repair Grease Trap	September 28, 2023	October 30, 2023	October 31, 2023 December 1, 2023 January 2, 2024 January 31, 2024 March 4, 2024 April 4, 2024 May 1, 2024 May 31, 2024 July 1, 2024 July 31, 2024 September 3, 2024	Incomplete
Repair Grease Trap	October 31, 2024	November 30, 2024	December 2, 2024 December 31, 2024 January 31, 2025 March 3, 2025 March 31, 2025 May 1, 2025 June 2, 2025 July 1, 2025 September 2, 2025	Outstanding

**ATTACHMENT II**

**Failure to submit Self-Monitoring Compliance Reports on time or not at all:**

<b>Month</b>	<b>Due Date</b>	<b># of NOVS Issued</b>	<b>Date NOVs Issued</b>	<b>Status</b>
October 2023	November 30, 2023	6	December 1, 2023 January 2, 2024 January 31, 2024 March 4, 2024 April 1, 2024 May 1, 2024	Received May 6, 2024
April 2024	May 30, 2024	4	May 31, 2024 July 1, 2024 July 31, 2024 September 3, 2024	Received September 6, 2024
October 2024	November 30, 2024	2	December 2, 2024 December 31, 2024	Received January 10, 2025
April 2025	May 30, 2025	4	June 2, 2025 July 1, 2025 July 31, 2025 September 2, 2025	Outstanding













