

MODIFICATION

AUTHORIZATION TO DISCHARGE UNDER THE
RHODE ISLAND POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of Chapter 46-12 of the Rhode Island General Laws, as amended, RIPDES Permit No. RI0021555 issued to Rhode Island Air National Guard, for the facility located at Quonset State Airport on October 27, 2015, shall be modified as follows:

Part I.A.1 of the Permit shall be modified to include an effective date of January 1, 2016, an end date that is the effective date of the permit modification, and to change the TSS limit to “monitor only” as indicated in Attachment 1 of this permit modification.

Part I.A.2 of the Permit shall be modified to include an effective date that is the effective date of the permit modification and a revised footnote for the sampling location of Outfall 100A as indicated in Attachment 2 of this permit modification.

Part I.A.3 of the Permit shall be modified to include an effective date that is the effective date of the permit modification and a revised footnote for the sampling location of Outfall 100B as indicated in Attachment 3 of this permit modification.

Parts I.C.2 – I.C.5 and the first sentence of Part I.C.6 of the Permit shall be deleted in their entirety and replaced with the language in Attachment 4 of this permit modification.

The citations to various parts of the SWPPP in Parts I.C.6.b.(7), I.C.6.c.(2), and I.C.6.g of the Permit shall be revised to reflect the updated permit section numbering (seen in Attachment 4) as indicated in Attachment 5 of this permit modification.

Part I.E of the Permit shall be deleted in its entirety and replaced with the language in Attachment 6 of this permit modification.

Except as set forth in this modification, the remaining effluent limitations, monitoring requirements and other conditions in the original permit are unchanged and in effect.

This modification shall become effective on _____.

This permit and the authorization to discharge expire at midnight, December 31, 2020.

This change modifies the permit issued on October 27, 2015.

This modification consists of eleven (11) pages.

Signed this _____ day of _____, 2016.

DRAFT

Angelo S. Liberti, P.E., Chief of Surface Water Protection
Office of Water Resources
Rhode Island Department of Environmental Management
Providence, Rhode Island

Attachment 1

PART I

Permit No. RI0021555

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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on January 1, 2016 and lasting through the effective date of the permit modification, the permittee is authorized to discharge from Outfall serial number 001. Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		Concentration - specify units		<u>Monitoring Requirement</u>		
	Quantity - lbs./day		Average	Average	Maximum	Measurement	Sample
	<u>Average</u>	<u>Maximum</u>	<u>Monthly</u>	<u>Weekly</u>	<u>Daily</u>	<u>Frequency</u>	<u>Type</u>
Flow		--- MGD				Quarterly	Estimate
Oil & Grease					15 mg/l	1/Quarter	Grab ¹
TSS					--- mg/l	1/Quarter	Grab ¹

--- Signifies a parameter which must be monitored and data must be reported; no limit has been established at this time.

¹ Wet weather samples must be collected during the first 30 minutes from discharges resulting from a storm event that is greater than 0.1 inch of rainfall in a 24-hour period and at least 72 hours from the previously measurable (greater than 0.1 inch of rainfall in a 24-hour period) storm event. If this is not feasible, wet weather samples may be taken within the first hour of discharge and noted on the Discharge Monitoring Report.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: Outfall 001 (storm water from the RIANG 143rd Airlift Wing base storm water collection system and off-site storm water inputs that enter this system, after treatment by the 22,500 gallon oil/water separator. The sampling location must be at the final discharge point from the 60 inch storm drain located in a concrete headwall into Fry's Pond).

Attachment 2

PART I

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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning on the effective date of the permit modification and lasting through permit expiration, the permittee is authorized to discharge from Outfall serial number 100A. Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		Concentration - specify units		<u>Monitoring Requirement</u>		
	Quantity - lbs./day		Average	Average	Maximum	Measurement	Sample
	<u>Average Monthly</u>	<u>Maximum Daily</u> --- MGD	<u>Monthly</u>	<u>Weekly</u>	<u>Daily</u>	<u>Frequency</u> Continuous	<u>Type</u> Continuous ¹
Flow							
Oil & Grease					15 mg/l	1/Quarter	Grab ²
TSS					20 mg/l	1/Quarter	Grab ²
Benzene					--- ug/l	1/Quarter	Grab ²
Toluene					--- ug/l	1/Quarter	Grab ²
Ethylbenzene					--- ug/l	1/Quarter	Grab ²
Total Xylenes					--- ug/l	1/Quarter	Grab ²
Ethanol					--- ug/l	1/Quarter	Grab ^{2,3}
Polynuclear Aromatic Hydrocarbons (PAHs)							
Acenaphthene					--- ug/l	1/Quarter	Grab ²
Acenaphthylene					--- ug/l	1/Quarter	Grab ²
Anthracene					--- ug/l	1/Quarter	Grab ²
Benzo (a) anthracene					--- ug/l	1/Quarter	Grab ²
Benzo (a) pyrene					--- ug/l	1/Quarter	Grab ²
Benzo (b) fluoranthene					--- ug/l	1/Quarter	Grab ²
Benzo (ghi) perylene					--- ug/l	1/Quarter	Grab ²
Benzo (k) fluoranthene					--- ug/l	1/Quarter	Grab ²

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning on the effective date of the permit modification and lasting through permit expiration, the permittee is authorized to discharge from Outfall serial number 100A. Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		Concentration - specify units		<u>Monitoring Requirement</u>		
	Quantity - lbs./day		Average	Average	Maximum	Measurement	Sample
	<u>Monthly</u>	<u>Daily</u>	<u>Monthly</u>	<u>Weekly</u>	<u>Daily</u>	<u>Frequency</u>	<u>Type</u>
Chrysene					--- ug/l	1/Quarter	Grab ²
Dibenzo (a,h) anthracene					--- ug/l	1/Quarter	Grab ²
Fluoranthene					--- ug/l	1/Quarter	Grab ²
Fluorene					--- ug/l	1/Quarter	Grab ²
Indeno (1,2,3-cd) pyrene					--- ug/l	1/Quarter	Grab ²
Naphthalene					--- ug/l	1/Quarter	Grab ²
Phenanthrene					--- ug/l	1/Quarter	Grab ²
Pyrene					--- ug/l	1/Quarter	Grab ²

--- Signifies a parameter which must be monitored and data must be reported; no limit has been established at this time.

¹ Flow shall be determined by the use of a continuous flow monitor.

² One (1) sample shall be taken during wet weather. Wet weather samples must be collected during the first 30 minutes from discharges resulting from a storm event that is greater than 0.1 inch of rainfall in a 24-hour period and at least 72 hours from the previously measurable (greater than 0.1 inch of rainfall in a 24-hour period) storm event. If this is not feasible, wet weather samples may be taken within the first hour of discharge and noted on the Discharge Monitoring Report.

³ Ethanol shall be analyzed using EPA method 1671.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: Outfall 100 (Storm water from the Petroleum based fuels, oil or lubricants (POL) Facility yard area/tanker truck parking area after treatment by the 8,000 gallon oil/water separator. The sampling location must be immediately downstream from the oil/water separator, prior to commingling with off-site storm water inputs).

Attachment 3

PART I

Permit No. RI0021555
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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

3. During the period beginning on the effective date of the permit modification and lasting through permit expiration, the permittee is authorized to discharge from Outfall serial number 100B. Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		Concentration - specify units		<u>Monitoring Requirement</u>		
	Quantity - lbs./day		Average	Average	Maximum	Measurement	Sample
	<u>Monthly</u>	<u>Maximum Daily</u>	<u>Monthly</u>	<u>Weekly</u>	<u>Daily</u>	<u>Frequency</u>	<u>Type</u>
Flow		--- MGD				Continuous	Continuous ¹
Oil & Grease					15 mg/l	1/Quarter	Grab ²
TSS					20 mg/l	1/Quarter	Grab ²
Benzene					--- ug/l	1/Quarter	Grab ²
Toluene					--- ug/l	1/Quarter	Grab ²
Ethylbenzene					--- ug/l	1/Quarter	Grab ²
Total Xylenes					--- ug/l	1/Quarter	Grab ²
Ethanol					--- ug/l	1/Quarter	Grab ^{2,3}
Polynuclear Aromatic Hydrocarbons (PAHs)							
Acenaphthene					--- ug/l	1/Quarter	Grab ²
Acenaphthylene					--- ug/l	1/Quarter	Grab ²
Anthracene					--- ug/l	1/Quarter	Grab ²
Benzo (a) anthracene					--- ug/l	1/Quarter	Grab ²
Benzo (a) pyrene					--- ug/l	1/Quarter	Grab ²
Benzo (b) fluoranthene					--- ug/l	1/Quarter	Grab ²
Benzo (ghi) perylene					--- ug/l	1/Quarter	Grab ²
Benzo (k) fluoranthene					--- ug/l	1/Quarter	Grab ²

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

3. During the period beginning on the effective date of the permit modification and lasting through permit expiration, the permittee is authorized to discharge from Outfall serial number 100B. Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		Concentration - specify units		<u>Monitoring Requirement</u>		
	Quantity - lbs./day		Average	Average	Maximum	Measurement	Sample
	<u>Average Monthly</u>	<u>Maximum Daily</u>	<u>Monthly</u>	<u>Weekly</u>	<u>Daily</u>	<u>Frequency</u>	<u>Type</u>
Chrysene					--- ug/l	1/Quarter	Grab ²
Dibenzo (a,h) anthracene					--- ug/l	1/Quarter	Grab ²
Fluoranthene					--- ug/l	1/Quarter	Grab ²
Fluorene					--- ug/l	1/Quarter	Grab ²
Indeno (1,2,3-cd) pyrene					--- ug/l	1/Quarter	Grab ²
Naphthalene					--- ug/l	1/Quarter	Grab ²
Phenanthrene					--- ug/l	1/Quarter	Grab ²
Pyrene					--- ug/l	1/Quarter	Grab ²

--- Signifies a parameter which must be monitored and data must be reported; no limit has been established at this time.

¹ Flow shall be determined by the use of a continuous flow monitor.

² One (1) sample shall be taken during dry weather. Dry weather samples must be collected during the controlled release of storm water within the Petroleum-based fuels, oil or lubricants (POL) Facility secondary containment area(s) with proper allowances for hydraulic detention time (time for flow to travel from the oil/water separator to the sampling location).

³ Ethanol shall be analyzed using EPA method 1671.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: Outfall 100 (storm water from the POL Facility secondary containment area(s) after treatment by the 8,000 gallon oil/water separator. The sampling location must be immediately downstream from the oil/water separator, prior to commingling with off-site storm water inputs).

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2. RIANG has submitted a plan to the DEM on September 1, 2016 for the implementation of appropriate storm water controls at the vehicle maintenance/refueling facility (Building 3). RIANG must ensure that the installation of the source-specific storm water controls will be done in accordance with all Town of North Kingstown, State, and Quonset Development Corporation (QDC) requirements. The plan will be subject to DEM review, modification, and approval. For the source-specific storm water controls at the vehicle maintenance/refueling facility, RIANG shall consider the following minimum design elements (Note: If RIANG will infiltrate any of the storm water from the vehicle maintenance/refueling facility, they must follow all the below elements):
 - a. Any storm water from the fuel dispensing and tank filling areas shall be treated using either a multi-chamber oil/water separator or acceptable proprietary device (minimum oil storage capacity of 500 gallons) that is preceded by at least one catch basin;
 - b. Provide a roof over the fuel dispensing area with roof drainage directed away from the dispensing area;
 - c. Elevate the fuel dispensing and tank filling areas to prevent storm water from running in and through them;
 - d. Provide grooved concrete for the perimeter of the pad around the fuel dispensing area to be used to contain small spills.
3.
 - a. RIANG shall submit an amended SWPPP to the DEM by September 1, 2017 that includes the addition of the representative sampling/monitoring point (defined as Outfall 100), sampling protocols for wet and dry weather sampling events, and updated site plans identifying the location of Outfall 100.
 - b. One (1) year following the installation of the storm water controls as required in Part I.C.2, RIANG shall submit an amended SWPPP to the DEM that includes a description of the storm water controls at the vehicle maintenance/refueling facility and an updated site plan identifying the location of the storm water controls.
4. The SWPPP shall be signed by the permittee in accordance with RIPDES Rule 12 and retained on-site. The SWPPP shall be made available upon request by the DEM.
5. If the SWPPP is reviewed by the DEM the permittee may be notified at any time that the SWPPP does not meet one or more of the minimum requirements of this part. After such notification from the DEM, the permittee shall make changes to the SWPPP and shall submit a written certification that the requested changes have been made. Unless otherwise provided by the DEM, the permittee shall have thirty (30) days after such notification to make the necessary changes.
6. The permittee shall immediately amend the SWPPP whenever there is a change in design, construction, operation, or maintenance, which has a significant effect of the potential for

the discharge of pollutants to the waters of the State; a release of reportable quantities of hazardous substances and oil; or if the SWPPP proves to be ineffective in achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity. Changes must be noted and then submitted to DEM within fourteen (14) days. Amendments to the SWPPP may be reviewed by DEM in the same manner as Part I.C.5 of this permit.

7. The SWPPP shall include, at a minimum, the following items:

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Parts I.C.7.b(7)

- (7) *Storm Water Management.* The SWPPP must contain a narrative consideration of the appropriateness of traditional storm water management practices. Based on an assessment of the potential of various sources at the plant to contribute pollutants to storm water discharges associated with industrial activity (see Part I.C.7 of this permit), the SWPPP must provide that measures, determined to be reasonable and appropriate, must be implemented and maintained.

Part I.C.7.c(2)

- (2) *Annual Deicing Fluid Collection and Management Report.* An annual report must be prepared which provides a summary and description of glycol usage, collection and management activities during the previous deicing season. Such report shall be submitted to the DEM with the Annual Site Inspection Reports required under Part I.C.7.g no later than July 15th of each year and must include, at a minimum, the following:

Part I.C.7.g

- g. Annual Site Inspection Report. An annual site inspection must be conducted by appropriate personnel named in the SWPPP to verify that the description of potential pollutant sources required under Part I.C.7.a is accurate, that the drainage map has been updated or otherwise modified to reflect current conditions, and controls to reduce pollutants in storm water discharges associated with industrial activity identified in the SWPPP are being implemented and are adequate. If possible, the annual site inspection must be conducted during a period of actual deicing operations. If not practicable during active deicing or the weather is too inclement, conduct the evaluations when deicing operations are likely to occur and the materials and equipment for deicing are in place. The following areas shall be included in all inspections: aircraft and runway deicing areas, storage areas for aircraft/vehicles/equipment awaiting maintenance, fueling area(s), aircraft/vehicle/equipment maintenance areas (both indoors and outdoors), material storage areas, aircraft/vehicle/equipment cleaning areas, loading and unloading areas, and storm water discharge location and receiving water. A tracking or follow up procedure must be used to ensure that the appropriate action has been taken in response to the inspection. A copy of the annual site inspection report and records documenting significant observations made during the site inspection must be submitted to the DEM by July 15th for the previous twelve (12) month period (July 1 – June 30). A copy of the annual site inspection report must also be retained as part of the SWPPP for a minimum of five (5) years.

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E. MONITORING AND REPORTING

1. Monitoring

All monitoring required by this permit shall be done in accordance with sampling and analytical testing procedures specified in Federal Regulations (40 CFR Part 136).

2. Submittal of DMRs Using NetDMR

The permittee shall continue to submit its quarterly monitoring data in discharge monitoring reports (DMRs) to DEM no later than the 15th day of the month following the completed quarter electronically using NetDMR. When the permittee submits DMRs using NetDMR, it is not required to submit hard copies of DMRs to DEM.

3. Submittal of Reports as NetDMR Attachments

Unless otherwise specified in this permit, the permittee must submit electronic copies of documents in NetDMR that are directly related to the DMR. These include the following:

- DMR Cover Letters
- Below Detection Limit summary tables
- Storm event information per Part I.E.7 of the permit
- Storm water sampling waiver per Part I.E.8 of the permit

All other reports should be submitted to DEM hard copy via regular US mail (See Part I.E.5 below).

4. Submittal of Requests to DEM

The following requests, reports, and information described in this permit shall be submitted as hard copy to the DEM.

- Transfer of Permit notice
- Request for changes in sampling location
- Request for reduction in testing frequency
- Request to add chemicals or “bioremedial agents including microbes” to the collection and treatment system per Part I.A.5 of the permit

These reports, information, and requests shall be submitted to DEM by hard copy mail to the following address:

Rhode Island Department of Environmental Management
RIPDES Program
235 Promenade Street
Providence, Rhode Island 02908

5. Submittal of Reports to DEM

The following notifications and reports shall be submitted as hard copy with a cover letter describing the submission. These reports shall be signed and dated originals submitted to DEM.

- Written notifications required under Part II
- Notice of unauthorized discharges
- Amendments to the SWPPP per Parts I.C.3, I.C.5, and I.C.6 of the permit
- Annual Deicing Fluid Collection and Management Report per Part I.C.7.c of the permit
- Annual Site Inspection Report per Part I.C.7.g of the permit

This information shall be submitted to DEM at the following address:

Rhode Island Department of Environmental Management
RIPDES Program
235 Promenade Street
Providence, Rhode Island 02908

6. Verbal Reports and Verbal Notifications

Any verbal reports or verbal notifications, if required in Parts I and/or II of this permit, shall be made to the DEM. This includes verbal reports and notifications which require reporting within 24 hours. (See Part II(1)(5) General Requirements for 24-hour reporting) Verbal reports and verbal notifications shall be made to DEM at (401) 222-4700 or (401) 222-3070 at night.

7. In addition to the required sampling results submitted in accordance with Part I.A.1., I.A.2., and I.A.3 of this permit, the permittee must provide the date and duration (hours) of the storm events sampled, the total depth of rainfall (inches), and the total volume of runoff (Ft³). This information must be submitted electronically with the DMR forms at the frequency specified in Part I.E.2 of this permit.

8. If the permittee is unable to collect samples due to adverse climatic conditions which make the collection of samples dangerous or impractical, the permittee must submit, in lieu of sampling data, a description of why samples could not be collected, including available precipitation data for the monitoring period. The permittee can only exercise this waiver once in a two (2) year period for the outfalls designated as 001 and 100. A waiver is not required if there was no flow from the outfall for the reporting period. This information must be submitted electronically with the DMR form for the period in which a sampling waiver is being requested.

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF WATER RESOURCES
235 PROMENADE STREET
PROVIDENCE, RHODE ISLAND 02908-5767

STATEMENT OF BASIS

RHODE ISLAND POLLUTANT DISCHARGE ELIMINATION SYSTEM (RIPDES) PERMIT TO DISCHARGE TO WATERS OF THE STATE

RIPDES PERMIT NO.

RI0021555

NAME AND ADDRESS OF APPLICANT:

Rhode Island Air National Guard
143rd Airlift Wing
2 Hercules Drive
North Kingstown, RI 02825

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Rhode Island Air National Guard
Quonset State Airport
2 Hercules Drive
North Kingstown, RI 02825

RECEIVING WATER:

Frys Pond (Water Body ID# RI0007027L-06)

CLASSIFICATION:

A

I. Proposed Action, Type of Facility, and Discharge Location

The Rhode Island Department of Environmental Management (DEM) proposes to issue a modification to the Rhode Island Air National Guard's (RIANG)'s RIPDES Permit to discharge into the designated receiving water. The proposed modifications include revised footnotes for the sampling locations at Outfall 100A/B, a permit condition requiring the RIANG to develop and submit a plan for implementing Best Management Practices (BMPs) at the vehicle maintenance/refueling facility, and updated requirements for the electronic reporting of Discharge Monitoring Report (DMR) forms all contained in RIPDES Permit No. RI0021555 issued on October 27, 2015. The facility's discharge consists of storm water runoff associated with industrial activity at RIANG's base. The discharge is to Frys Pond.

II. Permit Limitations and Conditions

The proposed permit modifications to effluent limitations and monitoring requirements may be found in the draft permit modification.

III. Permit Modification Basis and Explanation of Effluent Limitation Derivation

The RIANG 143rd Airlift Wing (AW) operates the facility located at the Quonset State Airport in North Kingstown, RI. The facility provides support for the 143AW, which flies and maintains C-130 aircraft to support its airlift mission. This permit authorizes storm water and allowable non-storm water point source discharges as defined in the permit to Frys Pond from RIANG's storm water collection system.

Permit No. RI0021555 was issued on October 27, 2015 and became effective January 1, 2016. Because RIANG was concerned that it would not be able to comply with the TSS limits of 20 mg/L at Outfalls 001A and 100A, RIANG requested a stay of the final permit limits via a stay/hearing request letter dated December 2, 2015. The December 2nd submittal requested a stay of the following permit conditions until the RIPDES permit could be modified:

- Part I.A. – Daily Maximum effluent limitations for Total Suspended Solids (TSS) for Outfall 001A (the sampling location at the final discharge point from the 60 inch storm drain located in a concrete headwall into Frys Pond) and Outfall 100A (the sampling location immediately downstream from the oil/water separator following the drainage manhole located within the 30 inch RCP storm drainage line, but prior to commingling with off-site storm water inputs).

In the request for hearing provided by RIANG in the December 2nd submittal it was noted that the facility would not be able to comply with the TSS limits at Outfall 001A due to Frys Pond being tidally influenced, background TSS levels in the pond being above the 20 mg/L daily maximum limit, and storm water discharging into the pond including additional sources of storm water from surrounding industries. Also, the hearing request stated that RIANG may not be able to comply with the TSS limits at the new sampling point, defined in the October 2015 RIPDES permit as Outfall 100A, as the storm water collected during wet weather conditions would include storm water runoff from the vehicle maintenance/refueling facility and Hercules Drive drainage areas, which would not be treated by an oil/water separator prior to sampling. Thus, RIANG believed they would not be able to meet the 20 mg/L Best Professionally Judgement (BPJ)-based limit with partial treatment of the storm water.

On January 21, 2016 RIANG submitted to the DEM a scope of work/monitoring plan as required by Part I.C.2.a of the October 2015 permit that provided an evaluation of the storm water collection systems downstream of the vehicle maintenance/refueling facility and Petroleum-based fuels, oil or lubricants (POL) facility. From this evaluation RIANG proposed a monitoring plan to characterize the storm water contributions from the vehicle maintenance facility utilizing existing sampling locations upstream and downstream from the maintenance facility, and also proposed a scope of work/schedule for installing a manhole access point downgradient of the POL facility 8,000 gallon oil/water separator with a five (5) month maximum timeframe to solicit a contractor and complete the installation of the monitoring location. RIANG additionally committed to amending its SWPPP within one (1) year of the approved date to install the new sampling location as required in Part I.C.2.b of the October 2015 permit. Upon review of January 21st submittal, the DEM determined that an on-site meeting and inspection would be necessary to discuss RIANG's pending stay request for TSS limits and to come to an agreement on the appropriate sampling location for the POL facility so the permit may be modified. On February 11, 2016 a compliance evaluation inspection and on-site meeting was conducted by RIPDES staff and the following were the outcomes of the site visit:

- RIANG will be able to install the monitoring location for the POL facility and both RIANG and DEM agreed the point immediately downstream from the POL facility

oil/water separator was representative of the storm water drainage for wet and dry weather sampling from the area. RIANG noted they may need additional time to complete the construction. As a result, DEM proposed to modify the date that RIANG must complete construction of the representative sampling/monitoring point (to be defined as Outfall 100A/B) from July 1, 2016 to September 1, 2016.

- RIANG requested a stay of the TSS permit limits at Outfall 001A until the new sampling location is installed.
- RIANG was willing to construct additional Best Management Practices (BMPs) at the vehicle maintenance/refueling facility when it is reconstructed.

In lieu of convening an Administrative Hearing the DEM had intended to enter into a Consent Agreement with RIANG regarding the disputed permit conditions contained in RIANG's December 2nd stay/appeal request. Subsequently, the DEM granted a stay for the Daily Maximum (20 mg/L) TSS effluent limitation for Outfall 001A (Part I.A.1 of the permit) that will continue until the permit modification becomes effective. RIANG indicated in an August 26, 2016 letter regarding the draft Consent Agreement/permit modification that the Outfall 100 representative sampling/monitoring point had been installed per the requirements of the draft permit modification, and RIANG requested the Consent Agreement be rendered moot so that DEM could move forward with the public notice of the draft permit modification. In addition, on September 1, 2016 RIANG submitted plans to implement storm water controls at the vehicle maintenance/refueling facility (Building 3) in accordance with the draft permit modification requirements. The only remaining schedule from the draft Consent Agreement was included in Paragraph 11 of the Agreement to address the process of reissuing a modified permit. Based on the above information and the items agreed to by DEM and RIANG during the February 11th inspection and on-site meeting, the modified permit will contain the following conditions:

- Parts I.A.1-3 of RIPDES Permit No. RI0021555 were modified to include updated effective and end dates, the TSS limits for Outfall 001A have been changed to monitor only, and the footnotes in Parts I.A.2-3 were revised to reflect the Outfall 100A/B monitoring location as a point immediately downstream from the 8,000-gallon oil/water separator at the POL facility, prior to commingling with off-site storm water inputs.
- Part I.C.2 of the RIPDES Permit No. RI0021555 was added to include a permit condition for implementing BMPs at the vehicle maintenance/refueling facility. RIANG has submitted a plan on September 1, 2016 for the implementation of the appropriate storm water controls at the vehicle maintenance/refueling facility (Building 3) that will be subject to DEM review, modification, and approval. For the source-specific storm water controls at the vehicle maintenance/refueling facility, RIANG shall consider the following minimum design elements (Note: If RIANG will infiltrate any of the storm water from the vehicle maintenance/refueling facility, they must follow all the below elements): Any storm water from the fuel dispensing and tank filling areas shall be treated using either a multi-chamber oil/water separator or acceptable proprietary device (minimum oil storage capacity of 500 gallons) that is preceded by at least one catch basin; Provide a roof over the fuel dispensing area with roof drainage directed away from the dispensing area; Elevate the fuel dispensing and tank filling areas to prevent storm water from running in and through them; Provide grooved concrete for the perimeter of the pad around the fuel dispensing area to be used to contain small spills.
- The SWPPP requirements in Part I.C.3 were updated so that RIANG must amend the SWPPP by September 1, 2017 to reflect the installation of the Outfall 100 sampling/monitoring location. In addition, the SWPPP will need to be amended again

within one (1) year of the installation of stormwater controls at the vehicle maintenance/refueling facility when it is reconstructed.

- Part I.E (Monitoring and Reporting) was revised to reflect the electronic submission of DMRs by RIANG using the EPA reporting tool NetDMR in order to comply with the NPDES Electronic Reporting Rule (E Rule). The E Rule requires NPDES regulated entities to begin submitting DMRs electronically by December 21, 2016.

IV. Comment Period, Hearing Requests, and Procedures for Final Decisions

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the Rhode Island Department of Environmental Management, Office of Water Resources, 235 Promenade Street, Providence, Rhode Island, 02908-5767. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to the Rhode Island Department of Environmental Management. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty (30) days of public notice whenever the Director finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Director will respond to all significant comments and make these responses available to the public at DEM's Providence Office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Director will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice. Within thirty (30) days following the notice of the final permit decision any interested person may submit a request for a formal hearing to reconsider or contest the final decision. Requests for formal hearings must satisfy the requirements of Rule 49 of the Regulations for the Rhode Island Pollutant Discharge Elimination System.

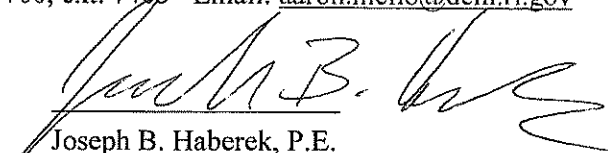
V. DEM Contact

Additional information concerning the permit may be obtained between the hours of 8:30 am and 4:00 pm, Monday through Friday, excluding holidays from:

Aaron Mello
Department of Environmental Management
235 Promenade Street
Providence, RI 02908

Telephone: (401) 222-4700, ext. 7405 Email: aaron.mello@dem.ri.gov

10/21/16
Date


Joseph B. Haberek, P.E.
Principal Sanitary Engineer