

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. RI0023639 issued to Greenwich Mills, LLC on August 5, 2009, shall be modified as follows:

The measurement frequency requirements, specified in Part I.A.1 and Part I.A.2 of the Permit, shall be deleted and replaced with the measurement frequency requirements specified in Attachments A and B of this modification.

The reporting requirements, specified in Part I.C.2 of the Permit, shall be deleted and replaced with the reporting requirements specified in Attachment C of 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, September 30, 2014.

This change modifies the permit issued on August 5, 2009.

This modification consists of four (4) pages.

Signed this _____ day of _____, 2013.

DRAFT

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

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

MODIFICATION – STATEMENT OF BASIS

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

RIPDES PERMIT NO. **RI0023639**

NAME AND ADDRESS OF APPLICANT:

Greenwich Mills, LLC
PO Box 1954
East Greenwich, Rhode Island 02818

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

42 Ladd Street
Warwick, Rhode Island 02818

RECEIVING WATER: **Greenwich Cove**

CLASSIFICATION: **SB1**

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

The above named applicant has been issued a RIPDES Permit to discharge into the designated receiving water. The discharges from the facility consist of effluent from a groundwater treatment system associated with contaminated groundwater infiltrating into an elevator shaft sump. The primary components of this treatment system include a submersible pump, a bag filter, and two (2) 200-pound granular activated carbon (GAC) vessels in series. The discharge is to an existing catch basin located at 42 Ladd Street, which discharges to Greenwich Cove. The final discharge is from outfall 100, which consists of elevator shaft sump water. The applicant has requested that the DEM consider reducing the permit monitoring frequency for each of the outfalls specified in the permit from once per quarter to twice per year on the basis of permit limit compliance history. The DEM has determined that a reduction in sampling frequency is appropriate for outfall 100.

II. Permit Modification Limitations and Conditions

The proposed changes to the monitoring requirements applicable to outfall 100 may be found in Attachments A-C of the Draft Permit Modification.

III. Permit Modification Basis

On March 4, 2013 Cardino ATC, on behalf of Greenwich Mills, LLC, requested a reduction in monitoring frequency for outfall 100.

The discharge from Outfall 100 consists of effluent from a groundwater treatment system associated with the treatment of contaminated groundwater that infiltrates into an elevator shaft sump located in the lower level of the building located in Lot 169, at the 42 Ladd Street facility. The current permit requires the permittee to sample the midpoint and effluent sample locations from the elevator sump groundwater treatment system at a frequency of once per quarter. The permit also requires the permittee to sample the influent to the groundwater treatment system on an annual basis, with influent data due January 15 of each year. The current permit requires all monitoring data to be reported to the DEM on Discharge Monitoring Report (DMR) forms on a

quarterly basis. The permittee has requested a reduction in monitoring frequency at the midfluent and effluent monitoring locations from quarterly to twice per year. The basis for this request is the facility's presentation, in correspondence dated March 4, 2013, of influent data which indicated that no outfall 100 influent concentrations have exceeded permit limitations since before December 2008.

The DEM has determined, based on information submitted by the facility on its March 4, 2013 correspondence, that a reduction in midfluent and effluent sampling frequency is appropriate. This determination is based on the fact that influent pollutant concentrations are typically less than detection and, therefore, actual system performance data has demonstrated that the granular activated carbon treatment system break through time is much greater than six months. Given this extended breakthrough time, a monitoring frequency of twice per year would be sufficient to detect any breakthrough of contaminants from the granular activated carbon treatment system. Part I. A. 5 of the permit, which states "The permittee shall conduct a primary carbon bed change out within 48 hours of detecting breakthrough of pollutants greater than the limits in Parts I.A.1 and I.A.2 at the midfluent sample point (between GAC units) of the elevator shaft sump groundwater treatment system (outfall 100) or at a minimum frequency of once every 12 months", will remain as a condition of the permit. Permittee compliance with Part I.A.5 of the permit, coupled with compliance with the proposed semi-annual system midfluent and effluent monitoring is adequate to ensure that water quality will be protected.

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

All persons, including applicants, who believe any condition of the draft permit modification 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 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**

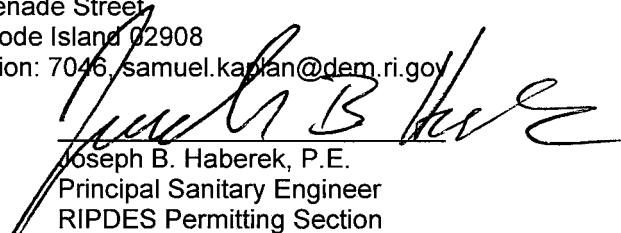
Additional information concerning the permit may be obtained between the hours of 8:30 a.m. and 4:00 p.m., Monday through Friday, excluding holidays from:

Samuel Kaplan, P.E.
RIPDES Program, Office of Water Resources
Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908

Telephone: (401) 222-6820, extension: 7046, samuel.kaplan@dem.ri.gov

Date

7/2/13


Joseph B. Haberek, P.E.
Principal Sanitary Engineer
RIPDES Permitting Section
Office of Water Resources
Department of Environmental Management

ATTACHMENT A

PART I

Permit No. RI0023639
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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through permit expiration, the permittee is authorized to discharge from outfall serial number(s) 100 (effluent from elevator sump groundwater treatment system).

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>					<u>Monitoring Requirement</u>	
	Quantity - lbs./day		Concentration - specify units			<u>Measurement Frequency</u>	<u>Sample Type</u>
	<u>Average Monthly</u>	<u>Maximum Daily</u>	<u>Average Monthly</u> *(Minimum)	<u>Average Weekly</u> *(Average)	<u>Maximum Daily</u> *(Maximum)		
Flow	--- gpm	6048 gal/day				Continuous	Recorder
Tetrachloroethylene			--- ug/l		5 ug/l	2/Year ¹	Grab
cis-1,2 -Dichloroethene			--- ug/l		5 ug/l	2/Year ¹	Grab
pH			(6.5 S.U.)		(8.5 S.U.)	2/Year	Grab

() Values in parentheses represent the minimum and maximum values.

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

¹ Midpoint and effluent samples shall be taken at a frequency of twice per year with one sample taken January 1 – June 30 and another taken July 1 – December 31. Influent samples should be taken annually and analyzed using EPA methods 624 and 625.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: Internal Outfall 100 (elevator shaft sump groundwater treatment system midpoint and effluent sample locations).

ATTACHMENT B

PART I

Permit No. RI0023639
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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning on the effective date and lasting through permit expiration, the permittee is authorized to discharge from outfall serial number(s) 100 (effluent from elevator sump groundwater treatment system).

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>			<u>Concentration - specify units</u>			<u>Monitoring Requirement</u>	
	Quantity - lbs./day		Average <u>Monthly</u> *(Minimum)	Average		Maximum <u>Daily</u> *(Maximum)	<u>Measurement Frequency</u>	<u>Sample Type</u>
	<u>Average Monthly</u>	<u>Maximum Daily</u>		<u>Weekly</u> *(Average)	<u>Daily</u>			
Ethylbenzene			---	ug/l		5 ug/l	2/Year ¹	Grab
Naphthalene			---	ug/l		5 ug/l	2/Year ¹	Grab
n-Propylbenzene			---	ug/l		5 ug/l	2/Year ¹	Grab
Toluene			---	ug/l		5 ug/l	2/Year ¹	Grab
1,2,4-Trimethylbenzene			---	ug/l		5 ug/l	2/Year ¹	Grab
Xylenes			---	ug/l		5 ug/l	2/Year ¹	Grab

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

¹ Midpoint and effluent samples shall be taken at a frequency of twice per year with one sample taken January 1 – June 30 and another taken July 1 – December 31. Influent samples should be taken annually and analyzed using EPA methods 624 and 625.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: Internal Outfall 100 (elevator shaft sump groundwater treatment system midpoint and effluent sample locations).

ATTACHMENT C

Permit No. RI0023639
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C. 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. Reporting

Monitoring results obtained during the previous six months shall be summarized and reported on Discharge Monitoring Report (DMR) Forms, postmarked no later than the 15th day of the month following the completed half year as follows:

<u>Semi-annual Testing to be Performed</u>	<u>Report Due No Later Than</u>	<u>Results Submitted on DMR for</u>
January 1 - June 30	July 15	January 1 - June 30
July 1 - December 31	January 15	July 1 - December 31

The first report is due on the 15th of the month following the calendar half year in which the permit becomes effective.

A signed copy of these, and all other reports required herein, shall be submitted to:

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