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

PUBLIC NOTICE OF PROPOSED PERMIT ACTIONS UNDER THE RHODE ISLAND POLLUTANT DISCHARGE ELIMINATION SYSTEM (RIPDES) PROGRAM WHICH REGULATES DISCHARGES INTO THE WATERS OF THE STATE UNDER CHAPTER 46-12 OF THE RHODE ISLAND GENERAL LAWS OF 1956, AS AMENDED.

DATE OF NOTICE: Friday, June 26, 2026

PUBLIC NOTICE NUMBER: PN-26-03

DRAFT RIPDES PERMITS
RIPDES PERMIT NUMBER: **RI0021814**

NAME AND MAILING ADDRESS OF APPLICANT:
Ashaway Line and Twine Manufacturing Company
24 Laurel Street
Ashaway, Rhode Island 02804

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:
Ashaway Line and Twine Manufacturing Company
Upper and Lower Mill Building Boilers
Laurel Street
Ashaway, Rhode Island 02804

RECEIVING WATER: **Ashaway River & Tributaries [RI0008039R-02B]**

RECEIVING WATER CLASSIFICATION: **B**

The facility, located in Ashaway, manufactures cord and twine. The discharge consists of boiler blowdown from the facility's two steam boilers, including a chemical additive used to prevent corrosion to the steam boilers. The Lower Mill discharges to Outfall 001 through a 2-inch diameter pipe, and the Upper Mill discharges to Outfall 002 through a 2-inch diameter pipe. The boiler blowdowns from both mills are discharged to the Ashaway River (also known as the Ashawog River). This permit includes monitoring and effluent limits to ensure that the discharge will not cause a water quality violation. It requires that the facility monitor the discharge and report the results to the DEM on a regular schedule.

RIPDES PERMIT NUMBER: **RI0023973**

NAME AND MAILING ADDRESS OF APPLICANT:

Town of Tiverton
343 Highland Road
Tiverton RI, 02878

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Tiverton Landfill #2
3524 Main Road
Tiverton, RI 02878

RECEIVING WATERS: **Quaker Creek [RI0010031R-04]**
Borden Brook & Tributaries [RI0010031R-01]

RECEIVING WATER CLASSIFICATION: **Quaker Creek: AA,**
Borden Brook & Tributaries: AA

The facility, which is the source of the discharge, is a capped, unlined, inactive landfill located in Tiverton, RI. The discharge consists of runoff from the capped landfill. The runoff passes through on-site stormwater BMPs such as detention basins, bioretention areas, sediment forebays, erosion control, check dams, and rip rap prior to discharge to the designated receiving waters through Outfalls 001, 002, 004, 0005, and 006. As per the Total Maximum Daily Loads (TMDL) for Phosphorus for the City of Newport Drinking Water Reservoirs, approved by EPA in November 2021, the Town of Tiverton was required to obtain a RIPDES permit to mitigate the observed water quality impacts from the facility. The permit reflects the current state of the facility, regulating the discharge from the inactive, capped, landfill. The permit includes effluent benchmarks for pollutants of concern and a regular monitoring and reporting schedule.

FURTHER INFORMATION:
A statement of basis (describing the type of facility and significant factual, legal and policy questions considered in these permit actions) for each permit may be obtained at no cost by writing or calling DEM as noted below:

Ekaterini Papazekos, EIT, Environmental Engineer I
Rhode Island Department of Environmental Management
Office of Water Resources
235 Promenade Street
Providence, Rhode Island 02908-5767
(401) 537-4036
Email: ekaterini.papazekos@dem.ri.gov

The administrative record containing all documents relating to these permit actions is on file and may be inspected, by appointment, at the DEM's Providence office mentioned above between 8:30AM and 4:00 PM, Monday through Friday, except holidays.

PUBLIC COMMENT AND REQUEST FOR PUBLIC HEARING:
Pursuant to Chapter 42-17.4 of the Rhode Island General Laws a public hearing has been scheduled to consider these permits if requested. Requests for a Public Hearing must be submitted in writing to the attention of Ekaterini Papazekos at the address above. Notice should be taken that if DEM receives a request from twenty-five (25) people, a governmental agency or subdivision, or an association having no less than twenty-five (25) members on or before 4:00 PM on Monday, July 27, 2026, a public hearing will be held at the following time and place:

5:00 PM Monday, August 4, 2026
Room 280
235 Promenade Street
Providence, Rhode Island 02908

Interested persons should contact DEM to confirm if a hearing will be held at the time and location noted above.

235 Promenade Street is accessible to individuals who are handicapped. If communication assistance (readers/interpreters/captioners) is needed, or any other accommodation to ensure equal participation, please call Ekaterini Papazekos or RI Relay 711 by 4 PM on Friday, July 31, 2026, so arrangements can be made to provide such assistance at no cost to the person requesting.

Interested parties may submit comments on the permit actions and the administrative record to the address above no later than 4:00 PM on Wednesday, August 5, 2026.

If, during the public comment period, significant new questions are raised concerning any of the permits, DEM may require a new draft permit or statement of basis or may reopen the public comment period. A public notice will be issued for any of these actions.

Any person, including the permittee/applicant, who believes these permit actions are inappropriate, must raise all reasonably ascertainable issues and submit all reasonably available arguments and factual grounds supporting their position, including all supporting material, by the close of the public comment period under 250-RICR-150-10-1.42 of the Regulations for the Rhode Island Pollutant Discharge Elimination System. The public comment period is from Friday June 26, 2026 to Wednesday August 5, 2026. Commenters may request a longer comment period if necessary to provide a reasonable opportunity to comply with these requirements. Comments should be directed to DEM as noted above.

FINAL DECISION AND APPEALS:

Following the close of the comment period, and after a public hearing, if such hearing is held, the Director will issue a final decision and forward a copy of the final decision to the permittee and each person who has submitted written comments or requested notice. Within 30 days following the notice of the final decision, any interested person may submit a request for a formal hearing in accordance with the requirements of 250-RICR-150-10-1.50 of the Regulations for the Rhode Island Pollutant Discharge Elimination System.

25 June 2026
Date

Heidi Travers
Heidi Travers, P.E.
Environmental Engineer IV
RIPDES, Office of Water Resources
Department of Environmental Management

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, the

Ashaway Line and Twine Manufacturing Company
24 Laurel Street
Ashaway, Rhode Island 02804

is authorized to discharge from a facility located at the

Ashaway Line and Twine Manufacturing Company
Upper and Lower Mill Building Boilers
Laurel Street
Ashaway, Rhode Island 02804

to receiving waters named

Ashaway River & Tributaries [RI0008039R-02B]

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on _____.

This permit and the authorization to discharge expire at midnight, five (5) years from the effective date.

This permit supersedes the permit issued on January 26, 2016.

This permit consists of 5 pages in Part I including effluent limitations, monitoring requirements, etc. and 8 pages in Part II including General Conditions.

Signed this _____ day of _____ , 2026.

DRAFT

_____
Jospeh B. Haberek, P.E., Administrator for Surface Water Protection
Office of Water Resources
Rhode Island Department of Environmental Management
Providence, Rhode Island

PART I

I.A. Effluent Limitations and Monitoring Requirements

I.A.1. During the period beginning on the effective date of this permit and lasting through permit expiration, the permittee is authorized to discharge from outfall serial number 001A (lower mill boiler blow down) and 002A (upper mill boiler blowdown). Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations					Monitoring Requirement	
	Quantity – lbs./day		Concentration – Specify Units				
	Average Monthly	Maximum Daily	Average Monthly *(Minimum)	Average Weekly	Maximum Daily *(Maximum)	Measurement Frequency	Sample Type
Flow	--- GPD	60 GPD				1/Day[1]	Calculated[1]
pH			(6.5 s.u.)*		(11.9 s.u)*	1/Month	Grab
Oil and Grease					15 mg/L	1/Quarter	Grab

Samples taken in compliance with the monitoring requirements specified above shall be taken on a normal operating day.

*Values in parenthesis ( ) are to be reported as Minimum / Maximum for the reporting period rather than Average Monthly/Maximum.

[1]Flow shall be measured each discharge and calculated using a flow totalizer or other method approved by DEM in writing. Flow for each discharge shall be recorded and maintained onsite. Monthly average flow is to be calculated by dividing the total flow discharged for a given month by the number of days in which there was a discharge during the month (i.e., if a given month had 30 days, but the facility only discharged on 25 days, the monthly average flow would be determined by dividing the total volume discharged during the month by 25 days). Since the reporting period consists of more than one month (i.e., quarterly reporting), the monthly average flow to be reported on the DMR is the highest monthly average flow for all the months in the reporting period. Reported maximum daily flow is the highest daily flow over the reporting period.

I.A.2 All existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(1) One hundred micrograms per liter (100 µg/L);

(2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitro-phenol; and one milligram per liter (1 mg/L) for antimony;

(3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR §122.21(g)(7); or

(4) Any other notification level established by the Director in accordance with 40 CFR §122.44(f) and Rhode Island Regulations.

b. That any activity has occurred or will occur which would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(1) Five hundred micrograms per liter (500 µg/L);

(2) One milligram per liter (1 mg/L) for antimony;

(3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR §122.21(g)(7); or

(4) Any other notification level established by the Director in accordance with 40 CFR §122.44(f) and Rhode Island Regulations.

c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or by-product any toxic pollutant which was not reported in the permit application.

I.A.3 This permit serves as the State's Water Quality Certificate for the discharges described herein.

I.A.4. The permittee shall evaluate the use of non-intrusive methods for boiler system maintenance in order to minimize chemical use at the facility and subsequent discharge to state surface waters. If chemical addition is the only alternative, the permittee must comply with all of the requirements of this permit with regard to chemical additives.

I.A.5. Unless authorized elsewhere in this Permit, the permittee must meet the following requirements concerning maintenance chemicals for boiler blowdown water. This permit prohibits the use of additives expected to pose significant risks to wildlife or human health. The permittee is required to demonstrate that the expected discharge concentration of the additive(s) to be used will not be harmful to aquatic life. This requirement is imposed in lieu of a continuing monitoring program for the additives in the discharge.

I.A.6. The permittee is prohibited from using the following chemicals:

a. Maintenance chemicals that contain any compounds for which the receiving water body is listed as impaired for in the State of Rhode Island 303(d) List of Impaired Waters

b. Any maintenance chemicals or biocides that contain tributyl tin, bis (tributyltin) oxide, or chlorinated phenols are strictly prohibited by this permit.

I.A.7. Any algicides and biocides are to be used in accordance with the registration requirements of the Federal Insecticide, Fungicide and Rodenticide Act.

I.A.8. The permittee must keep sufficient documentation on-site to show that the above requirements are being met. The following information shall be made available for on-site review by Department personnel:

a. Material Safety Data Sheets (MSDS) for each additive.

b. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) / U.S. EPA registration number.

c. A bound logbook that documents the quantity of additives added to the discharge, the frequency of additive applications, and the duration of additive applications.

I.A.9. All chemicals stored at the site shall be (1) within a diked area or other form of secondary containment, (2) supported by a base impervious to the material being contained, (3) covered by a permanent structure which prevents entry of precipitation, and (4) within a secondary containment area capable of holding without leakage or structural failure, 110 percent of the entire volume of the largest container within the area of the dike or barrier.

I.A.10. Discharge of boil out and boiler acid waste waters are not authorized by this permit. The discharge of these wastewaters must be permitted separately, or these wastewaters must be disposed of off-site in accordance with applicable regulations.

I.A.11. This permit authorizes the use of the chemical additives AWM-244 and AWM-455, manufactured by Atlantic Water Management, to prevent corrosion in the boiler systems at concentrations not to exceed 700 mg/L and 700 mg/L, in the boilers, respectively.

I.A.12. The permittee shall obtain Department approval before increasing the amount of any of the treatment chemicals listed in Part I.A.11 or prior to using any other additive(s) in conjunction with or in place of the treatment chemicals listed in Part I.A.11 of this permit. Prior to using any other chemical additives, the permittee shall submit for DEM approval a complete list of all chemical additives, including Material Safety Data Sheets. The permittee shall not begin to use any additional chemical additives other than those specified in Part I.A.11 of this permit without prior written approval from the Office of Water Resources.

I.A.13. This permit serves as the State's Water Quality Certificate for the discharges described herein.

I.B. Detection Limits

All analyses of parameters under this permit must comply with the National Pollutant Discharge Elimination System (NPDES): Uses of Sufficiently Sensitive Test Methods for Permit Applications and Reporting rule. Only sufficiently sensitive test methods may be used for analysis of parameters under this permit. In accordance with 40 CFR Part 136, EPA approved analysis techniques, quality assurance procedures and quality control procedures shall be followed for all reports required to be submitted under the RIPDES program. These procedures are described in "Methods for the Determination of Metals in Environmental Samples" (EPA/600/4-91/010) and "Methods for Chemical Analysis of Water and Wastes" (EPA/600/4-79/020).

I.C. Monitoring and Reporting

I.C.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).

I.C.2 Submittal of DMRs Using NetDMR

The permittee shall continue to submit its monitoring data in discharge monitoring reports (DMRs) to DEM electronically using NetDMR. When the permittee submits DMRs using NetDMR, it is not required to submit hard copies of DMRs to DEM. The permitee shall submit its time period monitoring reports to DEM per the following schedule:

Time Period Testing to be Performed	Report Due No Later Than	Results Submitted on DMR for
January 1 – March 31	April 15	January – March
April 1 – June 30	July 15	April – June
July 1 – September 30	October 15	July – September
October 1 – December 31	January 15	October – December

I.C.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:

a. DMR Cover Letters

I.C.4 Submittal of Requests and Reports to DEM

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

a. Transfer of Permit Notice
b. Request to use chemical additive(s)/cleaner(s) other than those listed in Part 1.A.11. (Part I.A.12)
c. Written notifications required under Part II
d. Notice of unauthorized discharges

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

I.C.5 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.(I)(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.

PART II

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General Requirements

a) Duty to Comply

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 46-12 of the Rhode Island General Laws and the Clean Water Act (CWA) and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(1) The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the CWA for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

(2) The CWA provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the CWA is subject to a civil penalty not to exceed $10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307 or 308 of the Act is subject to a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment of not more than 1 year, or both.

(3) Chapter 46-12 of the Rhode Island General Laws provides that any person who violates a permit condition is subject to a civil penalty of not more than $5,000 per day of such violation. Any person who willfully or negligently violates a permit condition is subject to a criminal penalty of not more than $10,000 per day of such violation and imprisonment for not more than 30 days, or both. Any person who knowingly makes any false statement in connection with the permit is subject to a criminal penalty of not more than $5,000 for each instance of violation or by imprisonment for not more than 30 days, or both.

b) Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The permittee shall submit a new application at least 180 days before the expiration date of the existing permit unless permission for a later date has been granted by the Director. (The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)

c) Need to Halt or Reduce Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

d) Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

e) Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures, and, where applicable, compliance with DEM "Rules and Regulations Pertaining to the Operation and Maintenance of Wastewater Treatment Facilities" and "Rules and Regulations Pertaining to the Disposal and Utilization of Wastewater Treatment Facility Sludge." This provision requires the operation of back-up or auxiliary facilities or similar systems only when the operation is necessary to achieve compliance with the conditions of the permit.

f) Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause, including but not limited to: (1) Violation of any terms or conditions of this permit; (2) Obtaining this permit by misrepresentation or

failure to disclose all relevant facts; or (3) A change in any conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

g) Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

h) Duty to Provide Information

The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

i) Inspection and Entry

The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

(1) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times any records that must be kept under the conditions of this permit;

(3) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit; and

(4) Sample or monitor any substances or parameters at any location, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the CWA or Rhode Island law.

j) Monitoring and Records

(1) Samples and measurements taken for the purpose of monitoring shall be representative of the volume and nature of the discharge over the sampling and reporting period.

(2) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings from continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 5 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

(3) Records of monitoring information shall include:
   (i) The date, exact place, and time of sampling or measurements;
   (ii) The individual(s) who performed the sampling or measurements;
   (iii) The date(s) analyses were performed;
   (iv) The individual(s) who performed the analyses;
   (v) The analytical techniques or methods used; and
   (vi) The results of such analyses.

(4) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 and applicable Rhode Island regulations, unless other test procedures have been specified in this permit.

(5) The CWA provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall upon conviction, be punished by a fine of not more than $10,000 per violation or by imprisonment for not more than

6 months per violation or by both. Chapter 46-12 of the Rhode Island General Laws also provides that such acts are subject to a fine of not more than $5,000 per violation, or by imprisonment for not more than 30 days per violation, or by both.

(6) Monitoring results must be reported on a Discharge Monitoring Report (DMR).

(7) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR Part 136, applicable State regulations, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

k) Signatory Requirement

All applications, reports, or information submitted to the Director shall be signed and certified in accordance with 250-RICR-150-10-1.12 of the Rhode Island Pollutant Discharge Elimination System (RIPDES) Regulations. Rhode Island General Laws, Chapter 46-12 provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than $5,000 per violation, or by imprisonment for not more than 30 days per violation, or by both.

l) Reporting Requirements

(1) Planned changes. The permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility.

(2) Anticipated noncompliance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with the permit requirements.

(3) Transfers. This permit is not transferable to any person except after written notice to the Director. The Director may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under State and Federal law.

(4) Monitoring reports. Monitoring results shall be reported at the intervals specified elsewhere in this permit.

(5) Twenty-four-hour reporting. The permittee shall immediately report any noncompliance which may endanger health or the environment by calling DEM at (401) 222-4700 or (401) 222-3070 at night.

A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

The following information must be reported immediately:

(i) Any unanticipated bypass which causes a violation of any effluent limitation in the permit; or
(ii) Any upset which causes a violation of any effluent limitation in the permit; or
(iii) Any violation of a maximum daily discharge limitation for any of the pollutants specifically listed by the Director in the permit.

The Director may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

(6) Other noncompliance. The permittee shall report all instances of noncompliance not reported under paragraphs (1), (2), and (5), of this section, at the time monitoring reports are submitted. The reports shall contain the information required in paragraph (l)(5) of the section.

(7) Other information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, they shall promptly submit such facts or information.

m) Bypass

"Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.

(1) Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (2) and (3) of this section.

(2) Notice.

(i) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten (10) days before the date of the bypass.

(ii) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in 250-RICR-150-10-1.14(R) of the RIPDES Regulations.

(3) Prohibition of bypass.

(i) Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:

(A) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage, where "severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production;

(B) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(C) The permittee submitted notices as required under paragraph (2) of this section.

(ii) The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed above in paragraph (3)(i) of this section.

n) Upset

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

(1) Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of paragraph (2) of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

(2) Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
   (i) An upset occurred and that the permittee can identify the cause(s) of the upset;
   (ii) The permitted facility was at the time being properly operated;
   (iii) The permittee submitted notice of the upset as required in 250-RICR-150-10-1.14(R) of the RIPDES Regulations; and
   (iv) The permittee complied with any remedial measures required under 250-RICR-150-10-1.14(E) of the RIPDES Regulations.

(3) Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

o) Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. Discharges which cause a violation of water quality standards are prohibited. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different or increased discharges of pollutants must be reported by submission of a new NPDES application at least 180 days prior to commencement of such discharges, or if such changes will not violate the effluent limitations specified in this permit, by notice, in writing, to the Director of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

Until such modification is effective, any new or increased discharge in excess of permit limits or not specifically authorized by the permit constitutes a violation.

p) Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner consistent with applicable Federal and State laws and regulations including, but not limited to the CWA and the Federal Resource Conservation and Recovery Act, 42 U.S.C. §§6901 et seq., Rhode Island General Laws, Chapters 46-12, 23-19.1 and regulations promulgated thereunder.

q) Power Failures

In order to maintain compliance with the effluent limitation and prohibitions of this permit, the permittee shall either:

In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or if such alternative power source is not in existence, and no date for its implementation appears in Part I,

Halt reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

r) Availability of Reports

Except for data determined to be confidential under paragraph (w) below, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the DEM, 235 Promenade Street, Providence, Rhode Island 02908. As required by the CWA, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the CWA and under Section 46-12-14 of the Rhode Island General Laws.

s) State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law.

t) Other Laws

The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, nor does it relieve the permittee of its obligation to comply with any other applicable Federal, State, and local laws and regulations.

u) Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

v) Reopener Clause

The Director reserves the right to make appropriate revisions to this permit in order to incorporate any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the CWA or State law. In accordance with 250-RICR-150-10-1.16 and 250-RICR-150-10-1.24 of the RIPDES Regulations, if any effluent standard or prohibition, or water quality standard is promulgated under the CWA or under State law which is more stringent than any limitation on the pollutant in the permit, or controls a pollutant not limited in the permit, then the Director may promptly reopen the permit and modify or revoke and reissue the permit to conform to the applicable standard.

w) Confidentiality of Information

(1) Any information submitted to DEM pursuant to these regulations may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions or, in the case of other submissions, by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of submission, DEM may make the information available to the pubic without further notice.

(2) Claims of confidentiality for the following information will be denied:

(i) The name and address of any permit applicant or permittee;
(ii) Permit applications, permits and any attachments thereto; and
(iii) NPDES effluent data.

x) Best Management Practices

The permittee shall adopt Best Management Practices (BMP) to control or abate the discharge of toxic pollutants and hazardous substances associated with or ancillary to the industrial manufacturing or treatment process and the Director may request the submission of a BMP plan where the Director determines that a permittee's practices may contribute significant amounts of such pollutants to waters of the State.

y) Right of Appeal

Within thirty (30) days of receipt of notice of a final permit decision, the permittee or any interested person may submit a request to the Director for an adjudicatory hearing to reconsider or contest that decision. The request for a hearing must conform to the requirements of 250-RICR-150-10-1.50 of the RIPDES Regulations.

Definitions

1. For purposes of this permit, those definitions contained in the RIPDES Regulations, and the Rhode Island Pretreatment Regulations shall apply.

2. The following abbreviations, when used, are defined below.

cu. M/day or M^3/day	cubic meters per day
mg/L	milligrams per liter
µg/L	micrograms per liter
lbs/day	pounds per day
kg/day	kilograms per day
Temp. °C	temperature in degrees Centigrade
Temp. °F	temperature in degrees Fahrenheit
Turb.	turbidity measured by the Nephelometric Method (NTU)
TNFR or TSS	total nonfilterable residue or total suspended solids
DO	dissolved oxygen
BOD	five-day biochemical oxygen demand unless otherwise specified
TKN	total Kjeldahl nitrogen as nitrogen
Total N	total nitrogen
NH_3-N	ammonia nitrogen as nitrogen
Total P	total phosphorus
COD	chemical oxygen demand
TOC	total organic carbon
Surfactant	surface-active agent
pH	a measure of the hydrogen ion concentration
PCB	polychlorinated biphenyl
CFS	cubic feet per second
MGD	million gallons per day
Oil & Grease	Freon extractable material
Total Coliform	total coliform bacteria
Fecal Coliform	total fecal coliform bacteria
mL/L	milliliter(s) per liter
NO_3-N	nitrate nitrogen as nitrogen
NO_2-N	nitrite nitrogen as nitrogen
NO_3-NO_2	combined nitrate and nitrite nitrogen as nitrogen
Cl_2	total residual chlorine

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 NUMBER: **RI0021814**

NAME AND ADDRESS OF APPLICANT:
Ashaway Line and Twine Manufacturing Company
24 Laurel Street
Ashaway, Rhode Island

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:
Ashaway Line and Twine Manufacturing Company
Upper and Lower Mill Building Boilers
Laurel Street
Ashaway, Rhode Island

RECEIVING WATER: Ashaway River

WATERBODY ID NUMBER (WBID): RI0008039R-02B

CLASSIFICATION: B

TABLE OF CONTENTS

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

The above-named applicant has applied to the Rhode Island Department of Environmental Management (DEM) for reissuance of a Rhode Island Pollutant Discharge Elimination System (RIPDES) Permit to discharge into the designated receiving water. The applicant's discharge consists of boiler blowdown from steam boilers. The discharge to the Ashaway River, also known as the Ashawog River, consists of boiler blowdown from the facility's steam boilers.

II. Description of Discharge

A quantitative description of the discharge in terms of significant effluent parameters based on the facility's Discharge Monitoring Report (DMR) data from April 2016 to December 2025 is shown in Attachment A.

III. Permit Limitations and Conditions

The effluent limitations of the permit, the monitoring requirements and any implementation schedule (if required) may be found in the draft permit.

IV. Permit Basis and Explanation of Effluent Limitation Derivation

Variances, Alternatives, and Justifications for Waivers of Application Requirements

No variances or alternatives to required standards were requested or granted. No waivers were requested or granted for any application requirements per 40 CFR §122.21(j) or (q).

Facility Description

Ashaway Line and Twine Manufacturing Company manufactures various types of cord and twine. The company has two (2) mills, each of which has a steam boiler. The Lower Mill discharges to Outfall 001 through a 2-inch diameter pipe and the Upper Mill discharges to Outfall 002 through a 2-inch diameter pipe. The boiler blowdowns from both mills are discharged to the Ashaway River (also known as the Ashawog River). The maximum daily discharge from each outfall is 60 gallons. The source water for the boilers is from an on-site well. A site plan is shown in Attachment E.

The most recent permit issued to Ashaway Line and Twine, authorized discharges from the above-mentioned facility, was issued on January 26, 2016. This permit became effective on April 1, 2016, and expired on April 1, 2021. The facility submitted an application for permit reissuance to the DEM on June 10, 2020. On August 7, 2020, DEM issued an application complete letter to the facility. In accordance with the Regulations for the Rhode Island Pollutant Discharge Elimination System (250-RICR-150-10-1.13), the facility's 2016 permit remains in effect. Once this permit is reissued, it will supersede the 2016 permit.

Receiving Water Description

The facility discharges to the Ashaway River waterbody segment with WBID RI0008039R-02B, located in Hopkinton. The waterbody segment is delineated by the Ashaway River highway bridge and the Ashaway River's confluence with the Pawcatuck River. The Ashaway River is classified as a Class B waterbody and is designated for fish and wildlife habitat and primary and secondary recreational activities. The waterbody is listed on DEM's 2024 303(d) List of Impaired Water Bodies as being impaired for enterococcus and does not support primary or secondary recreation. Impaired waters include those where TMDLs are required (i.e., Category 5 Waters or 303d List of Impaired Waters) and those where TMDLs are not required (i.e., Category 4 Waters).

Permit Limit Development

The requirements set forth in this permit are from the State's Water Quality Regulations (250-RICR-150-05-1) and the State's Regulations for the Rhode Island Pollutant Discharge Elimination System, both filed

pursuant to RIGL Chapter 46-12, as amended. RIDEM's primary authority over the permit comes from EPA's delegation of the program in September 1984 under the Federal Clean Water Act (CWA).

Development of RIPDES permit limitations is a multi-step process consisting of the following steps: calculating allowable water quality-based discharge levels based on instream criteria, background data, and available dilution; assigning applicable technology-based limits and appropriate Best Professional Judgement (BPJ) based limits; determining if technology based limits apply; comparing existing and proposed limits; comparing discharge data to proposed limits; performing an antidegradation/antibacksliding analysis to determine the final permit limits; and evaluating the ability of the facility to meet the final permit effluent limits.

Water quality criteria are comprised of numeric and narrative criteria. Numeric criteria are scientifically derived ambient concentrations developed by EPA or the State for various pollutants of concern to protect human health and aquatic life. Narrative criteria are statements that describe the desired water quality goal. A water quality-based permit limit protects receiving water quality by ensuring that water quality standards are met.

A technology-based limit is a numeric limit, which is determined by examining the capability of a treatment process to reduce or eliminate pollutants.

Effluent monitoring requirements have been specified in accordance with RIPDES regulations as well as 40 CFR 122.41 (j), 122.44 (i), and 122.48 to yield data representative of the discharge.

Dilution Factor

Appendix B of the Water Quality Regulations describes the flows used to determine compliance with the aquatic life criteria, specifying that the design flow to be utilized for aquatic life criteria shall not be exceeded at or above the lowest average 7 consecutive day low flow with an average recurrence frequency of once in 10 years (7Q10). The dilution was calculated from United States Geologic Survey (USGS) at the gauging station #01118360 on the Ashaway River in Ashaway, RI. Using this gauging station, the 7Q10 flow for the point of discharge was determined to be 2.18 cubic feet per second (ft^3/s). The dilution factor (DF) used to establish the allowable water quality-based discharge concentrations was determined using the following equation:

$$DF = \frac{Q_D + Q_{dis.}}{Q_{dis.}}$$

Where: DF: Dilution Factor
Q_D: Design Flow (Receiving Water 7Q10 Flow)
Q_{dis}: Discharge Flow

The dilution factor using this equation was determined to be 11,759 using a 7Q10 flow of 2.18 ft^3/s and a discharge flow of 0.0001854 ft^3/s equivalent to the sum of the maximum allowable discharge from each outfall (i.e., 120 gallons/day).

Selection of Pollutants of Concern

DEM conducted a reasonable potential analysis using the discharge monitoring report data along with information submitted as part of the facility's permit application. Based on this analysis, the pollutants of concern are flow, pH, temperature, and oil and grease. The monitoring requirements and permit limits, as applicable, for these pollutants are described in the following sections.

While the segment of the Ashaway River where the discharge is located is impaired for enterococcus, this permit does not require enterococcus monitoring as boiler blowdown is not expected to be a source of enterococcus.

pH

The permit includes a minimum pH limit of 6.5 S.U. and a maximum pH limit of 11.9 S.U. The previous permit had a minimum pH limit of 6.0. The new minimum pH permit limit is set to the water quality criteria. DMR data submitted by the facility demonstrated the facility can comply with the revised limit. The maximum pH limit is unchanged from the previous permit and was calculated using the dilution factor calculated in the previous section. A pH analysis entitled "pH Limit Calculation" was conducted showing that the pH limits in the permit will not cause an exceedance of the pH criteria in Table 1.8.D(2) of the Rhode Island Water Quality Regulations. This analysis can be found in Attachment D.

Temperature

A temperature analysis is presented in Attachment B "Effluent Temperature Analysis". This analysis demonstrates that even at a discharge temperature of 212°F (the boiling point of water), the discharge will have a minimal increase in the temperature of the river. Therefore, monitoring and permit limits are not required.

Oil and Grease

Oil and Grease effluent limitations are based on Best Professional Judgement (BPJ). The 15 mg/L daily maximum Oil and Grease limit is equivalent to the new source performance standard that the Environmental Protection Agency (EPA) has established for most industry groups. This standard represents the level of control achievable by the best available demonstrated control technology, process, operating method, or other alternative for the removal of oil and grease. Past data submitted by the facility via NetDMR indicates that the facility will be able to meet this effluent limit. This data can be found summarized in Attachment A.

Antibacksliding and Antidegredation

Provided below is a brief introduction to Antibacksliding and Antidegradation, as well as a discussion on how the two policies were used to calculate water quality-based limits.

Antibacksliding

Antibacksliding restricts the level of relaxation of water quality-based limits from the previous permit. Section 303(d)(4) of the Clean Water Act addresses antibacksliding as the following:

1. Standards not attained – For receiving waters that have not attained the applicable water quality standards, limits based on a TMDL or WLA can only be revised if the water quality standards will be met. This may be done by (i) determining that the cumulative effect of all such revised limits would assure the attainment of such water quality standards; or (ii) removing the designated use which is not being attained in accordance with regulations under Section 303.

2. Standards attained – For receiving waters achieving or exceeding applicable water quality standards, limits can be relaxed if the revision is consistent with the State's Antidegradation Policy.

Therefore, in order to determine whether backsliding is permissible, the first question that must be asked is whether or not the receiving water is attaining the water quality standard. The Office has determined the most appropriate evaluation of existing water quality is by calculating pollutant levels, which would result after the consideration of all currently valid RIPDES permit limits or historic discharge data (whichever is greater), background data (when available), and any new information (i.e., dilution factors).

Antidegradation

The DEM's "*Policy on the Implementation of the Antidegradation Provisions of the Rhode Island Water Quality Regulations July 2006*" (the Policy) established four tiers of water quality protection:

Tier 1. In all surface waters, existing uses and the level of water quality necessary to protect the existing uses shall be maintained and protected.

Tier 2. In waters where the existing water quality criteria exceeds the levels necessary to support the propagation of fish and wildlife and recreation in and on the water, that quality shall be maintained and protected except for insignificant changes in water quality as determined by the Director and in accordance with the Antidegradation Implementation Policy, as amended. In addition, the Director may allow significant degradation, which is determined to be necessary to achieve important economic or social benefits to the State in accordance with the Antidegradation Policy.

Tier 2½. Where high quality waters constitute Special Resource Protection Waters SRPWs[1], there shall be no measurable degradation of the existing water quality necessary to protect the characteristics which cause the waterbody to be designated a SRPW. Notwithstanding that all public drinking water supplies are SRPWs, public drinking water suppliers may undertake temporary and short-term activities within the boundary perimeter of a public drinking water supply impoundment for essential maintenance or to address emergency conditions in order to prevent adverse effect on public health or safety. These activities must comply with the requirements set forth in Tier 1 and Tier 2.

Tier 3. Where high quality waters constitute an Outstanding Natural Resource ONRWs[2], that water quality shall be maintained and protected. The State may allow some limited activities that result in temporary or short-term changes in the water quality of an ONRW. Such activities must not permanently degrade water quality or result in water quality lower than necessary to protect the existing uses in the ONRW.

In terms of the applicability of Tier 2 of the Policy, a water body is assessed as being high quality on a parameter-by-parameter basis. In accordance with Part II of the Policy, "Antidegradation applies to all new or increased projects or activities which may lower water quality or affect existing water uses, including but not limited to all 401 Water Quality Certification reviews and any new, reissued, or modified RIPDES permits." Part VI.A of the Policy indicates that it is not applicable to activities which result in insignificant (i.e., short-term minor) changes in water quality and that significant changes in water quality will only be allowed if it is necessary to accommodate important economic and social development in the area in which the receiving waters are located (important benefits demonstration). Part VI.B.4 of the Policy states that: "Theoretically, any new or increased discharge or activity could lower existing water quality and thus require the important benefits demonstration. However, DEM will: 1) evaluate applications on a case-by-case basis, using BPJ and all pertinent and available facts, including scientific and technical data and calculations as provided by the applicant; and 2) determine whether the incremental loss is significant enough to require the important benefits demonstration described below. [If not then as a general rule DEM will allocate no more than 20%.] Some of the considerations which will be made to determine if an impact is significant in each site specific decision are: 1) percent change in water quality parameter value and their temporal distribution; 2) quality and value of the resource; 3) cumulative impact of discharges and activities on water quality to date; 4) measurability of the change; 5) visibility of the change; 6) impact on fish and wildlife habitat; and 7) impact on potential and existing uses. As a general guide, any discharge or activity which consumes greater than 20% of the remaining assimilative capacity may be deemed significant and invoke full requirements to demonstrate important economic or social benefits."

In terms of a RIPDES permit, an increased discharge is defined as an increase in any limitation, which would result in an increased mass loading to a receiving water. The baseline for this comparison would be the monthly average mass loading established in the previous permit. It would be inappropriate to use the daily maximum mass loading since the Policy is not applicable to short-term changes in water quality.

[1] SRPWs are surface waters identified by the Director as having significant recreational or ecological uses.
[2] ONRWs are a special subset of high-quality water bodies, identified by the State as having significant recreational or ecological water uses.

In the case of this permit, both the discharge amounts and the limits remain the same as the previous permit issuance. Therefore, the limits are in compliance with the Antibacksliding and Antidegradation policy.

Other Conditions

Flow shall be calculated using a flow totalizer or other method approved by DEM in writing. Flow for each discharge shall be recorded and maintained onsite. Monthly average flow is to be calculated by dividing the total flow discharged for a given month by the number of days in which there was a discharge during the month (i.e., if a given month had 30 days, but the facility only discharged on 25 days, the monthly average flow would be determined by dividing the total volume discharged during the month by 25 days). Since the reporting period consists of more than one month (i.e., quarterly reporting), the monthly average flow to be reported on the DMR is the highest monthly average flow for all the months in the reporting period. Maximum daily flow is the highest daily flow over the reporting period.

The permitee is authorized to use 700 mg/L per boiler of chemical additives AWM-244 and AWM-455 to prevent boiler corrosion. This quantity has been carried over from the previous permit. Part I.A.8 of the permit requires that documentation regarding the additives used must be maintained onsite. Required documentation includes the material safety data sheets, the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) / U.S. EPA registration number. In addition, the facility must maintain a bound logbook that documents the quantity of additives added to the discharge, the frequency of additive applications, and the duration of additive applications. The facility must obtain approval from the DEM in writing prior to increasing the quantity of the chemical additives, including additional additives, or changing the chemical additives used. Parts I.A.4 through I.A.12 of the permit describe the acceptable use of chemical additives and additional chemical safety and handling requirements.

Permit Limit Summary

The following Table presents a summary of the permit limitations and monitoring requirements for Outfall 001A and Outfall 002A set forth in the Final Permit.

Table 1 Permit Limits – Outfall 001A and Outfall 002A

Parameter	Average Monthly	Maximum Daily	Minimum	Maximum	Measurement Frequency
Flow	-- GPD	60 GPD			1/Day
pH			6.5 S.U.	11.9 S.U.	1/Month
Oil and Grease		15 mg/L			1/Quarter

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

V. 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 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 the RIPDES Regulations (RI Code of Regulations: 250-RICR-150-10-1.50).

VI. 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:

Ekaterini Papazekos
Environmental Engineer I
RIPDES Program

Office of Water Resources / RIPDES Program
Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908
Telephone: (401) 537-4255
Email: ekaterini.papazekos@dem.ri.gov

25 June 2026
Date

Heidi Travers
Heidi Travers, P.E.
Environmental Engineer IV
RIPDES Program
Office of Water Resources
Department of Environmental Management

Attachment A

Summary of Discharge Monitoring Report Data
September 2015 through December 2025

Outfall 001A - Monitoring Location - Limit Set: 001 - 1 - A				
Monitoring Period End Date	**Flow (Daily Max)** 60 (gal/d)	**Oil & Grease (Daily Max)** 15 (mg/L)	**pH (Max)** 11.9 (SU)	**pH (min)** 6 (SU)
03/31/2016	60	4	10.6	10.3
06/30/2016	60	NODI: Q	10.5	9.6
09/30/2016	60	NODI: C	10.5	9.8
12/31/2016	60	0	10	9
03/31/2017	60	0	10.5	8
06/30/2017	60	0	10.2	8
09/30/2017	60	0	10.3	8
12/31/2017	60	0	10.5	10
03/31/2018	60	0	10.5	10
06/30/2018	60	11.9	10.5	10
09/30/2018	60	1.2	10.5	10
12/31/2018	60	0.07	10.5	10
03/31/2019	60	0	10.5	10
06/30/2019	60	0	10.5	10
09/30/2019	60	0	10.5	10
12/31/2019	60	0	10.5	10
03/31/2020	60	0	10.5	10
06/30/2020	60	0.9	10.5	10
09/30/2020	60	0.5	10.5	10
12/31/2020	60	1.4	10.5	10
03/31/2021	60	0.7	10.5	10
06/30/2021	60	1.1	10.5	10
09/30/2021	60	0.5	10.5	10
12/31/2021	60	2.1	10.5	10
03/31/2022	60	0.67	10.5	10
06/30/2022	60	2	10.5	10
09/30/2022	60	0.56	10.5	10
12/31/2022	60	1	10.5	10.5
03/31/2023	60	2.1	11.6	11.5
06/30/2023	60	1.7	11.8	11.7
09/30/2023	60	0.88	11.29	10.96
12/31/2023	60	1.6	11.8	11
03/31/2024	60	0.78	11.8	10.86
06/30/2024	60	1	11	10.73
09/30/2024	60	1	11.5	10.9
12/31/2024	60	6.6	11	10.5
03/31/2025	60	0.77	11	10.3
06/30/2025	60	1.3	10.8	10.3
09/30/2025	60	1	11	10.5
12/31/2025	60	0.889	11.4	10.5

Outfall 002A - Monitoring Location - Limit Set: 002 - 1 - A				
Monitoring Period End Date	**Flow (Daily Max)** 60 (gal/d)	**Oil & Grease (Daily Max)** 15 (mg/L)	**pH (Max)** 11.9 (SU)	**pH (Min)** 6 (SU)
03/31/2016	60	4	10.8	9.3
06/30/2016	60	NODI: C	11	10.6
09/30/2016	60	NODI: C	10.5	9.8
12/31/2016	60	0	10.3	8
03/31/2017	60	0	10.5	9.5
06/30/2017	60	0	10.5	8.5
09/30/2017	60	0	10.2	8.5
12/31/2017	60	0	10.5	10
03/31/2018	60	0	10.5	9.5
06/30/2018	60	11.9	10.5	10
09/30/2018	60	2	10	9.5
12/31/2018	60	0.5	10	9.5
03/31/2019	60	0	10	9.5
06/30/2019	60	0	10	9.5
09/30/2019	60	0	10	9.5
12/31/2019	60	0	10	9.5
03/31/2020	60	0	10	9.5
06/30/2020	60	1.8	10	9.5
09/30/2020	60	0.5	10	9.5
12/31/2020	60	1.6	10	9.5
03/31/2021	60	0.5	10	9.5
06/30/2021	60	5.1	10	9.5
09/30/2021	60	0.5	10	9.5
12/31/2021	60	0.5	10	9.5
03/31/2022	60	0.5	10	9.5
06/30/2022	60	0.92	10	9.5
09/30/2022	60	0.7	10	9.5
12/31/2022	60	0	11	11
03/31/2023	60	0	10.5	9.5
06/30/2023	60	0.59	10.9	10.7
09/30/2023	60	0.89	11.03	10.86
12/31/2023	60	2.2	10.8	10.64
03/31/2024	60	0.5	11	10.5
06/30/2024	60	1.2	11.5	10.6
09/30/2024	60	1.3	11.3	10.5
12/31/2024	60	2	11.6	10
03/31/2025	60	0.93	11.1	10.5
06/30/2025	60	1	10.6	10.5
09/30/2025	60	1	11.1	10.7
12/31/2025	60	0.667	11.2	10.7

Attachment B

Effluent Temperature Analysis

In order to determine the discharge temperature limit, it is necessary to evaluate the impact of the discharge on the receiving water. In accordance with the Rhode Island Water Quality Regulations, the maximum instream thermal impact of 4°F and the maximum instream temperature of 83°F must be met at the lowest 7Q10 flow. The proposed temperature limit (212°F) is the same as the temperature limit of the previous permit. The average instream Summer and Winter ambient temperatures were assumed based upon best professional judgement.

Summer Instream Temperature = $T_{instream}$ = 68°F
Winter Instream Temperature = $T_{instream}$ = 36°F
Maximum Thermal Impact = 4°F
Maximum Instream Temperature = 83°F
Maximum Discharge Temperature = T_{max} = 212°F
Maximum Flow from the facility = Q_{max} = 120 gpd
Ashaway River 7Q10 Flow = Q_{7Q10} = 1,408,971 gpd

Calculate the thermal impact of the discharge on the Ashaway river solve for ΔT in the energy balance. ΔT must be less than or equal to 4 to comply with Rhode Island Water Quality Regulations.

$$Q_{max} * T_{max} + Q_{7Q10} * T_{instream} = (Q_{max} + Q_{7Q10}) * (T_{instream} + \Delta T)$$

Case 1: Winter

$$120 * 212 + 1{,}408{,}971 * 36 = (120 + 1{,}408{,}971) * (36 + \Delta T)$$
$$\Delta T = 0.015\ °\text{F} \leq 4\ °\text{F}$$

$$T_{instream} + \Delta T \leq 83°\text{F}$$
$$36 + 0.015 = 36.015 \leq 83°\text{F}$$

Case 2: Summer

$$120 * 212 + 1{,}408{,}971 * 68 = (120 + 1{,}408{,}971) * (68 + \Delta T)$$
$$\Delta T = 0.012\ °\text{F} \leq 4\ °\text{F}$$

$$T_{instream} + \Delta T \leq 83°\text{F}$$
$$68 + 0.012 = 68.012 \leq 83°\text{F}$$

In both cases the discharge does not cause a significant change in the temperature of the Ashaway River, and the Water Quality Criteria are met.

Attachment C

Ashaway River pH and 7Q10 data – RIDEM Ambient River Monitoring Program and USGS StreamStats

RIDEM Ambient River Monitoring Program pH Data - Ashaway River

Organization	Waterbody	Station	SampleDate	Parameter	Result	Unit
RIDEM	Ashaway River & Tribs	PAW12	5/11/2011 0:00	pH	6.77	SU
RIDEM	Ashaway River & Tribs	PAW12	8/24/2011 0:00	pH	6.6	SU
RIDEM	Ashaway River & Tribs	PAW12	9/28/2011 0:00	pH	6.54	SU
RIDEM	Ashaway River & Tribs	PAW12a	8/17/2015 0:00	pH	6.86	SU
RIDEM	Ashaway River & Tribs	PAW12a	6/8/2015 0:00	pH	6.78	SU
RIDEM	Ashaway River & Tribs	PAW12a	9/3/2015 0:00	pH	6.71	SU
RIDEM	Ashaway River & Tribs	PAW12a	5/11/2015 0:00	pH	6.74	SU
RIDEM	Ashaway River & Tribs	PAW12a	6/8/2015 0:00	pH	6.76	SU
RIDEM	Ashaway River & Tribs	PAW12a	7/20/2015 0:00	pH	7.02	SU
RIDEM	Ashaway River & Tribs	PAW12a	8/17/2015 0:00	pH	6.69	SU
RIDEM	Ashaway River & Tribs	PAW12a	9/3/2015 0:00	pH	6.7	SU

StreamStats Gage Page

Gage Information

Name	Value
USGS Station Number	**01118360 (https://waterdata.usgs.gov/monitoring-location/01118360)**
Station Name	ASHAWAY RIVER AT ASHAWAY, RI
Station Type	Gaging Station, continuous record
Latitude	41.42343278
Longitude	-71.79173528
NWIS Latitude	41.42343288
NWIS Longitude	-71.7917351
Is regulated?	false
Agency	United States Geological Survey
NWIS Discharge Period of Record	08/16/2002 - 12/15/2004

Physical Characteristics

Filter By Statistic Group: Select Filter By Citation: Select

Land Cover Characteristics

Characteristic Name	Value	Units	Citation
Percent Forest	76.3	percent	**73**
Percent Impervious	1.3	percent	**73**
Percent Urban	1.97	percent	**73**

Characteristic Name	Value	Units	Citation
Percent Wetlands	7.92	percent	**73**
CROPS	8.08	percent	**73**
WATER	1.06	percent	**73**
Percent_Forested_Wetlands	6.36	percent	**73**
Percent_Nonforested_Wetlands	1.56	percent	**73**

Basin Dimensional Characteristics

Characteristic Name	Value	Units	Citation
Drainage Area	28.3	square miles	**73**
Drainage Area	28.6	square miles	**193**
Basin Perimeter	40.4	miles	**73**

Topographical Characteristics

Characteristic Name	Value	Units	Citation
Maximum Basin Elevation	530	feet	**73**
Mean Basin Elevation	261	feet	**73**
Minimum Basin Elevation	32.6	feet	**73**
Relief	498	feet	**73**
Mean Basin Slope from 10m DEM	7.17	percent	**73**
Elevation of Gage	32.9	feet	**73**
CENTROIDX	145696.48	feet	**73**
CENTROIDY	240092.49	feet	**73**
OUTLETX	124064.98	feet	**73**
OUTLETY	248054.98	feet	**73**

Geological Characteristics

Characteristic Name	Value	Units	Citation
Fraction_Underlain_By_Sand_And_Gravel	15	dimensionless	**73**

Stream Channel Properties

Characteristic Name	Value	Units	Citation
Stream Slope 10 and 85 Method	35.5	feet per mi	**73**
Stream Length Total	49.7	miles	**73**
Stream Density Edited	1.76	miles per square mile	**73**

Soil Properties

Characteristic Name	Value	Units	Citation
SSURGO Percent Hydrologic Soil Type A	4.04	percent	**73**
SSURGO Percent Hydrologic Soil Type B	47.9	percent	**73**
SSURGO Percent Hydrologic Soil Type C	20.5	percent	**73**
SSURGO Percent Hydrologic Soil Type D	24.6	percent	**73**

Temperature Statistics

Characteristic Name	Value	Units	Citation
Mean Annual Max Temperature	15	degrees F	**73**

Precipitation Statistics

Characteristic Name	Value	Units	Citation
Mean Annual Precip PRISM 1971 2000	49.8	inches	**73**

Streamflow Statistics

Filter By Statistic Group: Select Filter By Citation: Select

Show Only Preferred

Low-Flow Statistics

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
7 Day 2 Year Low Flow	4.56	cubic feet per second	✓	2		**73**	
7 Day 10 Year Low Flow	2.18	cubic feet per second	✓	2		**73**	

Flow-Duration Statistics

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
1 Percent Duration	366	cubic feet per second	✓	2		**73**	
2 Percent Duration	282	cubic feet per second	✓	2		**73**	
3 Percent Duration	241	cubic feet per second	✓	2		**73**	
5 Percent Duration	195	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
7 Percent Duration	166.6	cubic feet per second	✓	2		**73**	
10 Percent Duration	142	cubic feet per second	✓	2		**73**	
15 Percent Duration	113.9	cubic feet per second	✓	2		**73**	
20 Percent Duration	94.9	cubic feet per second	✓	2		**73**	
25 Percent Duration	82.1	cubic feet per second	✓	2		**73**	
30 Percent Duration	70.7	cubic feet per second	✓	2		**73**	
35 Percent Duration	61.7	cubic feet per second	✓	2		**73**	
40 Percent Duration	54	cubic feet per second	✓	2		**73**	
45 Percent Duration	45.6	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
50 Percent Duration	38.4	cubic feet per second	✓	2		**73**	
55 Percent Duration	33.3	cubic feet per second	✓	2		**73**	
60 Percent Duration	28.3	cubic feet per second	✓	2		**73**	
65 Percent Duration	23.5	cubic feet per second	✓	2		**73**	
70 Percent Duration	18.2	cubic feet per second	✓	2		**73**	
75 Percent Duration	14.7	cubic feet per second	✓	2		**73**	
80 Percent Duration	11.3	cubic feet per second	✓	2		**73**	
85 Percent Duration	8.79	cubic feet per second	✓	2		**73**	
90 Percent Duration	6.43	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
93 Percent Duration	5.32	cubic feet per second	✓	2		**73**	
95 Percent Duration	4.79	cubic feet per second	✓	2		**73**	
97 Percent Duration	3.76	cubic feet per second	✓	2		**73**	
98 Percent Duration	3.28	cubic feet per second	✓	2		**73**	
99 Percent Duration	2.71	cubic feet per second	✓	2		**73**	
99.5 Percent Duration	2.26	cubic feet per second	✓	2		**73**	
4 Percent Duration	212	cubic feet per second	✓	2		**73**	
6 Percent Duration	178	cubic feet per second	✓	2		**73**	
8 Percent Duration	158	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
9 Percent Duration	148.1	cubic feet per second	✓	2		**73**	
99.9 Percent Duration	1.35	cubic feet per second	✓	2		**73**	
99.95 Percent Duration	1.25	cubic feet per second	✓	2		**73**	
99.99 Percent Duration	1.2	cubic feet per second	✓	2		**73**	
0.5 Percent Duration	477	cubic feet per second	✓	2		**73**	
0.1 Percent Duration	749	cubic feet per second	✓	2		**73**	
0.05 Percent Duration	975	cubic feet per second	✓	2		**73**	
0.01 Percent Duration	1200	cubic feet per second	✓	2		**73**	
91 Percent Duration	6.43	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
92 Percent Duration	5.87	cubic feet per second	✓	2		**73**	
94 Percent Duration	5.32	cubic feet per second	✓	2		**73**	
96 Percent Duration	4.27	cubic feet per second	✓	2		**73**	

Annual Flow Statistics

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
Mean Annual Flow	55	cubic feet per second	✓	2		**73**	

Monthly Flow Statistics

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
January Mean Flow	80.5	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
February Mean Flow	85.6	cubic feet per second	✓	2		**73**	
March Mean Flow	115	cubic feet per second	✓	2		**73**	
April Mean Flow	112	cubic feet per second	✓	2		**73**	
May Mean Flow	71.9	cubic feet per second	✓	2		**73**	
June Mean Flow	44.9	cubic feet per second	✓	2		**73**	
July Mean Flow	18.8	cubic feet per second	✓	2		**73**	
August Mean Flow	15.7	cubic feet per second	✓	2		**73**	
September Mean Flow	12.4	cubic feet per second	✓	2		**73**	
October Mean Flow	21.5	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
November Mean Flow	43.5	cubic feet per second	✓	2		**73**	
December Mean Flow	75.5	cubic feet per second	✓	2		**73**	
Med Jan Monthly Mean Flow	54	cubic feet per second	✓	2		**73**	
Med Feb Monthly Mean Flow	71.7	cubic feet per second	✓	2		**73**	
Med Mar Monthly Mean Flow	86.3	cubic feet per second	✓	2		**73**	
Med Apr Monthly Mean Flow	103	cubic feet per second	✓	2		**73**	
Med May Monthly Mean Flow	61.7	cubic feet per second	✓	2		**73**	
Med Jun Monthly Mean Flow	29.5	cubic feet per second	✓	2		**73**	
Med Jul Monthly Mean Flow	12	cubic feet per second	✓	2		**73**	

Statistic Name	Value	Units	Preferred?	Years of Record	Standard Error, percent	Citation	Comments
Med Aug Monthly Mean Flow	10.7	cubic feet per second	✓	2		**73**	
Med Sep Monthly Mean Flow	9.72	cubic feet per second	✓	2		**73**	
Med Oct Monthly Mean Flow	12.6	cubic feet per second	✓	2		**73**	
Med Nov Monthly Mean Flow	34.1	cubic feet per second	✓	2		**73**	
Med Dec Monthly Mean Flow	54	cubic feet per second	✓	2		**73**	

Citations

ID	Citation
73	**Bent, G.C., Steeves, P.A., and Waite, A.M., 2014, Equations for estimating selected streamflow statistics in Rhode Island: U.S. Geological Survey Scientific Investigations Report 2014–5010, 65 p. (http://dx.doi.org/10.3133/sir20145010)**
193	**Imported from NWIS file (http://waterdata.usgs.gov/nwis/si)**

Attachment D

pH Limit Analysis

Permit limits must be protective of water quality and adhere to the Rhode Island Water Quality Criteria for Class B Freshwaters. The water quality criteria for pH in Class B waters are between 6.5 and 9.0 standard pH units, or as naturally occurs. The permit sets pH limits as a minimum of 6.5 standard pH units and a maximum of 11.9 standard pH units. The minimum pH limit is set to the water quality criteria, while the following buffer calculation demonstrates that the maximum permit limit is protective of water quality in the receiving water. The calculation uses the maximum allowable discharge flow, the maximum allowable pH limit, the 7Q10 flow of the receiving water, and the lowest and highest ambient pH measured over the last 15 years upstream of the facility's discharge. The ambient river data used is shown in Attachment C.

Ashaway River	
7Q10 Flow	1,408,971 gpd (2.18 cfs)
Lowest Ashaway River pH	6.54 S.U.
Highest Ashaway River pH	7.02 S.U.
Maximum Discharge Flow	120 gpd (1.86 x 10^{-4} cfs)

Permit Limits	
Maximum Discharge Flow	120 gpd (1.86 x 10^{-4} cfs)
Minimum pH	6.5 S.U.
Maximum pH	11.9 S.U.

By Definition

$$\text{pH} = -\log([H^+]) \text{; therefore } [H^+] = 10^{-pH}$$

Calculate the $[H^+]$ and $[OH^-]$ concentrations of the discharge at the maximum permitted pH limit.

$$[H^+] = 10^{-11.9} = 1.26 \times 10^{-12} \frac{mol}{L}$$

$$pOH = 14 - pH = 14 - 11.9 = 2.1$$

$$[OH^-] = 10^{-2.1} = 7.94 \times 10^{-3} \frac{mol}{L}$$

CASE I: Assume the pH of the Ashaway River is at lowest observed pH (6.54 S.U.). Calculate the $[H^+]$.

$$[H^+] = 10^{-6.54} = 2.88 \times 10^{-7} \frac{mol}{L}$$

Assume the discharge is a strong base, the river is a strong acid, and there is no buffering capacity. Calculate the initial concentrations of $[H^+]$ and $[OH^-]$ in the combined river combined with the discharge from the facility.

$$[OH^-]initial = discharge\ flow \times \frac{[OH^-]\ of\ discharge}{flow\ of\ river + discharge\ flow}$$

$$[OH^-]initial = 1.86 \times 10^{-4}\ cfs \times \frac{7.94 \times 10^{-3} \frac{mol}{L}}{2.188\ cfs} = 6.75 \times 10^{-7} \frac{mol}{L}$$

$$[H^+]initial = flow\ of\ river \times \frac{[H^+]\ of\ river}{flow\ of\ river + discharge\ flow}$$

$$[H^+]initial = 2.18\ cfs \times \frac{2.88 \times 10^{-7} \frac{mol}{L}}{2.188\ cfs} = 2.87 \times 10^{-7} \frac{mol}{L}$$

There is a higher initial concentration of $[OH^-]$ than $[H^+]$ so the solution will be basic. The excess $[OH^-]$ is:

$$6.75 \times 10^{-7} \frac{mol}{L} - 2.87 \times 10^{-7} \frac{mol}{L} = 3.88 \times 10^{-7} \frac{mol}{L}$$

The final pOH is:

$$pOH = -\log(3.88 \times 10^{-7}) = 6.41\ S.U.$$

The final pH is:

$$14 - 6.41 = 7.59\ \text{S. U.}$$

The discharge from the Ashaway Line and Twine facility could raise the river's pH from 6.54 S.U. to 7.59 S.U. This would not cause a water quality violation.

CASE II: Assume the pH of the Ashaway river is at highest observed pH (7.04 S.U.). Calculate the $[H^+]$:

$$[H^+] = 10^{-7.02} = 9.55 \times 10^{-8} \frac{mol}{L}$$

Assume no buffering capacity.

$$[OH^-]initial = 1.86 \times 10^{-4}\ cfs \times \frac{7.94 \times 10^{-3} \frac{mol}{L}}{2.188\ cfs} = 6.75 \times 10^{-7} \frac{mol}{L}$$

$$[H^+]initial = 2.18\ cfs \times \frac{9.55 \times 10^{-8} \frac{mol}{L}}{2.188\ cfs} = 9.515 \times 10^{-8} \frac{mol}{L}$$

There is a higher initial concentration of $[OH^-]$ than $[H^+]$ so the solution will be basic. The excess $[OH^-]$ is:

$$6.75 \times 10^{-7} \frac{mol}{L} - 9.515 \times 10^{-8} \frac{mol}{L} = 5.80 \times 10^{-7} \frac{mol}{L}$$

The final pOH is:

$$pOH = -\log(5.80 \times 10^{-7}) = 6.24\ S.U.$$

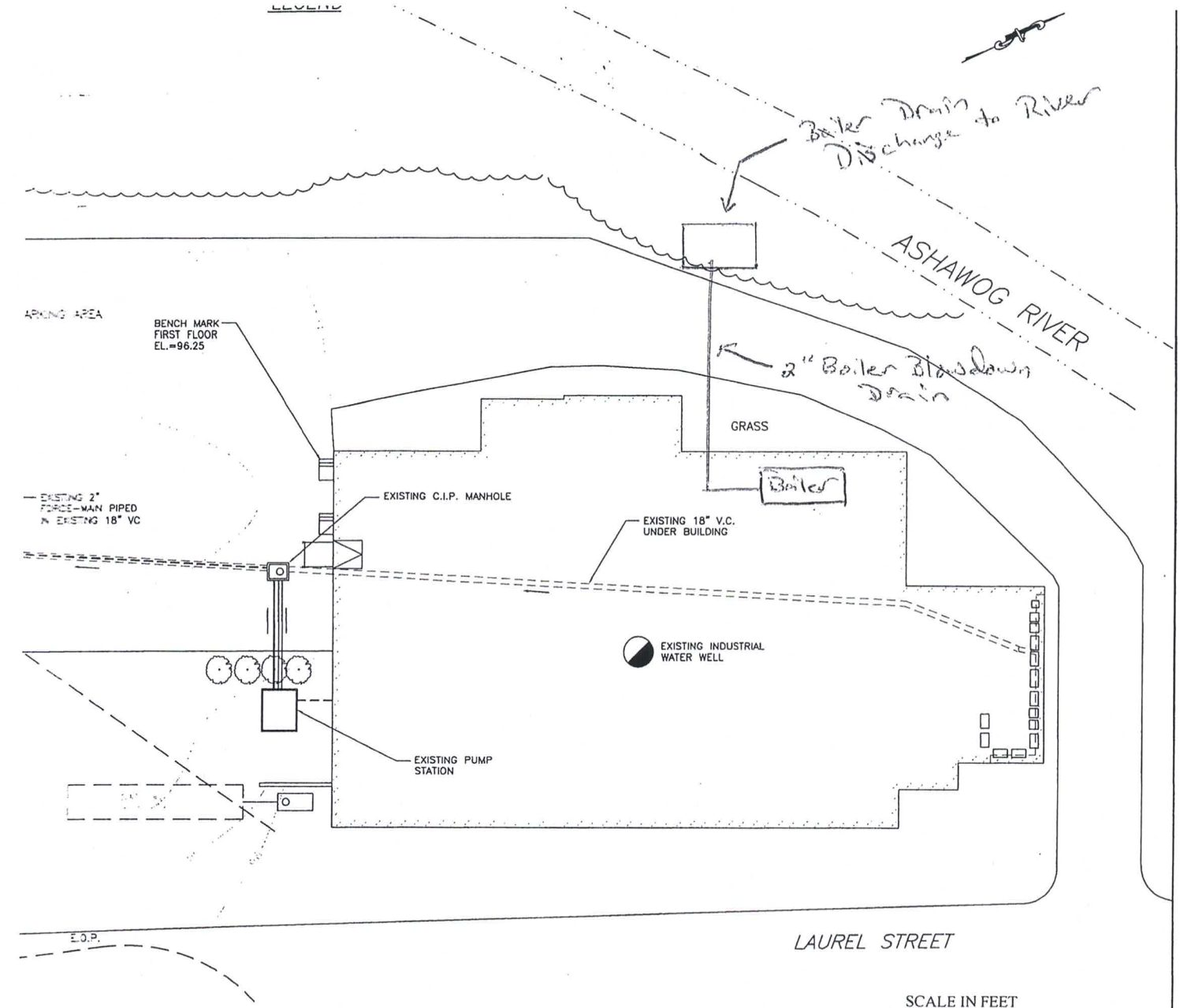
The final pH is:

$$14 - 6.24 = 7.58\ \text{S. U.}$$

The discharge from the Ashaway Line and Twine facility could raise the river's pH from 7.25 S.U. to 7.58 S.U. This would not cause a water quality violation.

Attachment E

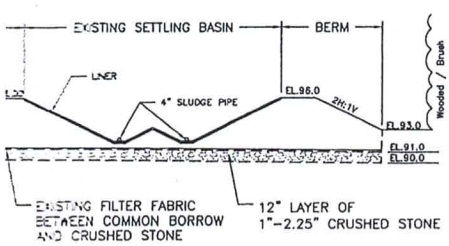
Site Plan



SCALE IN FEET

0 10 20 40 80

SCALE : 1"= 20'



* Lower Mill
24 Laurel Street

NO.	DATE	BY

REVISIONS

PREPARED FOR:

SHAWAY LINE & TWINE MFG. CO.
4 LAUREL STREET
SHAWAY, RHODE ISLAND

SHEET DESCRIPTION

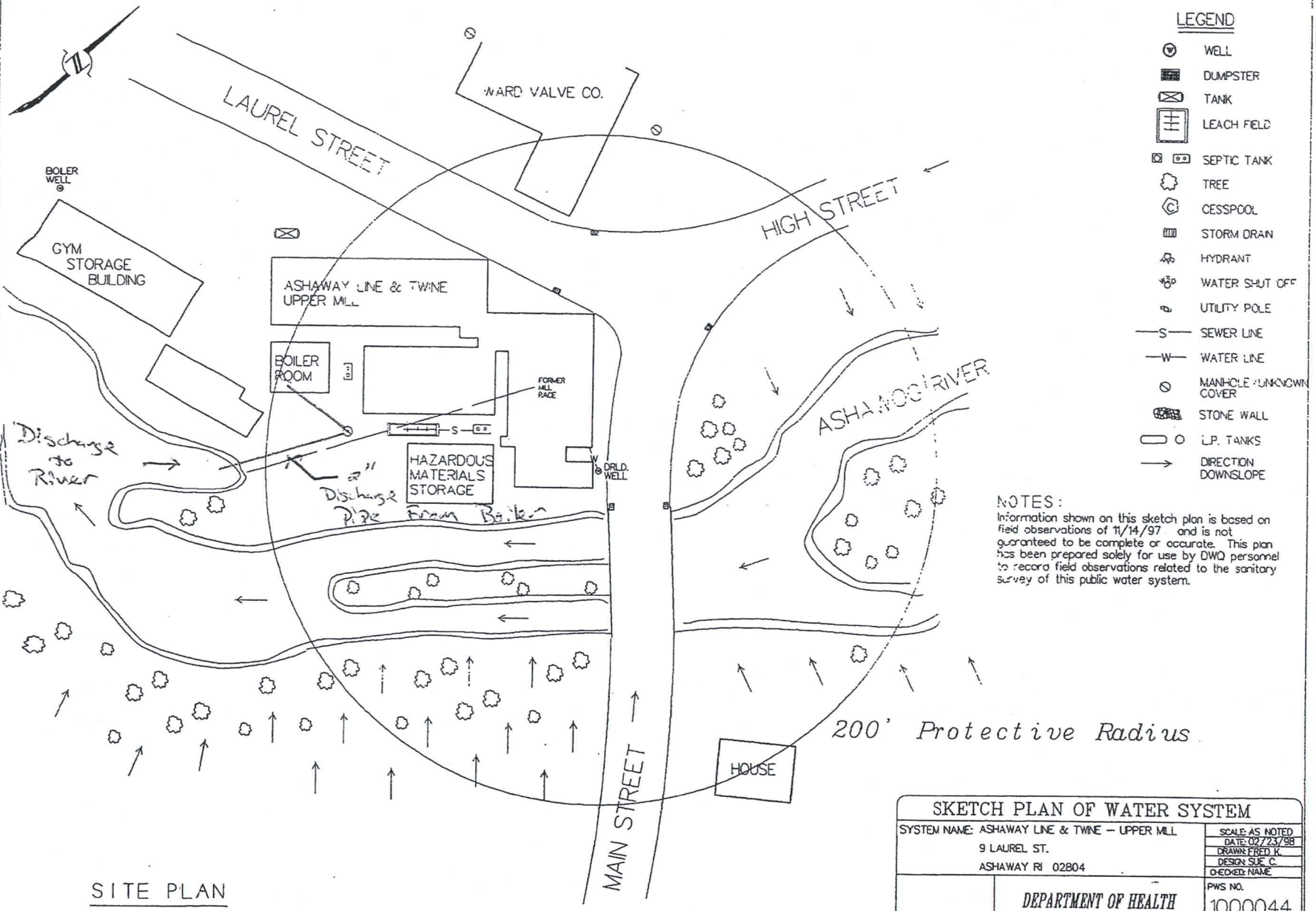
EXISTING CONDITIONS PLAN

PROJECT NO. 6849
DESIGNED BY RM
DRAWN BY ED
CHECKED BY RM
DATE JANUARY 2017
SCALE AS SHOWN

2

SHEET 2 OF 5

Upper Mill



NOTES:
Information shown on this sketch plan is based on field observations of 11/14/97 and is not guaranteed to be complete or accurate. This plan has been prepared solely for use by DWQ personnel to record field observations related to the sanitary survey of this public water system.

SITE PLAN
1" = 80'

SKETCH PLAN OF WATER SYSTEM

SYSTEM NAME: ASHAWAY LINE & TWINE – UPPER MILL
9 LAUREL ST.
ASHAWAY RI 02804

SCALE: AS NOTED
DATE: 02/23/98
DRAWN: FRED K.
DESIGN: SUE C.
CHECKED: NAME

DEPARTMENT OF HEALTH
DIVISION OF DRINKING WATER QUALITY
3 CAPITOL HILL
PROVIDENCE, RHODE ISLAND 02908

PWS NO.
1000044

FILE NAME.
1000044S