EA Engineering, Science, and Technology, Inc., PBC

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13 April 2024

Mr. Stephen Curtis
Port Facility Manager/FSO
Waterson Terminal Services, LLC
ProvPort, Inc. / Port of Providence RI
35 Terminal Road
Providence, RI 02905
www.watersonllc.com
401-461-9900 office

Subject: Green Marine Verification Summary Report 2023
Waterson Terminal Services, LLC
Providence, RI
EA Project # 63438-03-00-LS

Dear Mr. Curtis:

EA Engineering, Science and Technology, Inc. PBC (EA) is pleased to submit this Green Marine Verification Summary Report for 2023 Self-Assessment claimed levels to Waterson Terminal Services, LLC (WTS). The report summarizes the results of the Green Marine Verification completed the week of 8 April 2024.

EA thanks you for the opportunity to support WTS. Please contact me with any questions or comments.

Sincerely,

EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC., PBC

Brian Lesinski
Green Marine Verifier

cc: C. Kerlish, EA
C. Schwartz, EA

VERIFIED COMPANY INFORMATION
Company name Waterson Terminal Services, LLC
Company address 35 Terminal Road Providence, RI 02905
Company website www.watersonllc.com
Name and address of the person in charge of the Green Marine Program Stephen Curtis Port Facility Manager/FSO 401-461-9900 office
Number of employees 24 WTS administrative & management and ~70 unionized labor (ILA)
Number and name/location of terminals/sites or number of vessels participating in the program Waterson Terminal Services, LLC ProvPort, Inc. / Port of Providence RI 35 Terminal Road Providence, RI 02905
VERIFIER INFORMATION
Verifier name Brian C. Lesinski
Verifier address 301 Metro Centre Blvd. Warwick, RI 02886
Phone 401-287-0367
Verification date and time 10 April 2024
Name of persons interviewed during the verification (alphabetical) • Stephen Curtis, Facility Manager/Facility Security Officer (FSO) • John Gustus, Director of Operations • John Giarusso, Safety & Operations Manager • Kevin Sorenson, Lead Mechanic • Chris Waterson, CEO and President
LAST VERIFICATION
Date of last verification 13 April 2022
Scores reached during last verification 1. Greenhouse Gases and Air Pollutants – 2 2. Spill Prevention – 3 3. Dry Bulk Handling and Storage – 2 4. Community Impacts – 2 5. Environmental Leadership – 2 6. Waste Management – 2 7. Community Relations – NA
Site/vessel visit yes / no? Yes – site visit conducted 10 April 2024

1. EXECUTIVE SUMMARY

EA Engineering, Science and Technology, Inc., PBC (EA) was retained by Waterson Terminal Services (hereafter WTS) to conduct a Green Marine Verification in April 2024. The purpose of the verification was to document WTS's self-claimed levels of Green Marine environmental program progress on its 2023 self-evaluation. The period of review was calendar year 2022-2023. The verification was performed by Mr. Brian Lesinski with the active participation of WTS employees.

The review consisted of:

- Physical review of the facility;
- Interviews with various WTS employees;
- Observation of employee work practices;
- Review of documented plans, procedures, programs, and training;
- Examination of select facility records and documents; and
- Auditor's professional judgement of management practices.

The review was conducted in conformance with published Green Marine protocols and checklists, and information provided specifically:

- Self-Evaluation Guide and Summary
- Green Marine Smart Guide – Terminals

WTS has sufficiently implemented systems and processes to support the applicable performance levels verified. The summary of claimed and verified levels is summarized below:

Green Marine Verification Summary 2023 – Waterson Terminal Services, LLC

Environmental Performance Indicator	Level Claimed	Level Verified	Comments
1) Greenhouse Gases and Air Pollutants	3	3	Level 3 verified. Level 1 met. Level 2 met. Level 3 met. Level 4 not met – 1.4.1 not met – STOP.
2) Spill Prevention and Stormwater Management	3	4	Level 4 verified. Level 1 met. Level 2 met. 8 of 8 criteria met (100%). Level 3 met. Level 4 met. Level 5 not claimed or justified – STOP.
3) Dry Bulk Handling and Storage	3	3	Level 3 verified. Level 1 met. Level 2 met. Level 3 met. 3.2.6 not applicable. Level 4 not claimed or justified – STOP.
4) Community Impacts	2	2	Level 2 verified. Level 2 met. 9 of 10 criteria met. (90%) or 100% of applicable criteria. 4.2.5 not met. Level 3 not claimed or justified – STOP.

			verified as claimed. 11 of 15 criteria met (73%). Criterion 4.2.7 should be applicable (not NA as claimed). Level 3 not claimed and not justification provided.
5) Environmental Leadership	3	2	Level 2 verified. Level 1 met. Level 2 met. Level 3 not met. 5.3.2 not met – STOP.
6) Waste Management	2	2	Level 2 verified. Level 1 met. Level 2 met. 10 of 11 applicable criteria met (91%). Criterion 6.2.3 not met and 6.2.12 not applicable. Level 3 not met. 6.3.1 not met – STOP.
7) Community Relations	2	1	Level 1 verified. Level 1 met. Level 2 not met. 7.2.3 not met – STOP.

WTS joined Green Marine in 2018 and completed its initial verification in 2019 and continues to build and improve upon its environmental program performance. WTS improved scores in three performance indicators e.g., 1, 2, and 3. Two performance indicator levels were reduced from levels claimed for indicators 5 and 7. Commendables noted during the verification include:

- WTS leadership's interest, enthusiasm, and commitment to position WTS as an environmental steward in the stevedore community on the east coast.
- Obtaining ISO 14001:2015, 45001:2018 and 9001:2015 certifications with supporting manuals and standard operating procedures.
- Initiation of a 30-year master planning effort with consultant.
- Initial efforts to develop an Environmental, Social, Governance (ESG) report.
- Communicating prior Green Marine performance reports with stakeholders through WTS's website and promoting Green Marine involvement.
- Organization of supporting documentation including management plans and Green Marine "playbook" organized by performance indicator provided efficient review of requirements.
- WTS leadership involvement in local maritime and offshore wind power advocacy organizations including the City of Providence, RI Commerce Corporation, Near Port Community and Providence Resilience Partnership through financial and voluntary commitments for port infrastructure and neighborhood improvements.
- Transparency with public stakeholders through web site content e.g., contact and phone numbers, inquiry form, social media channels, etc.
- Terminal expansion and strategic infrastructure improvements to further position o in the wind power industry on the eastern seaboard (Orsted partnership).
- Decarbonization strategies include Fleet Electrification Assessment, secured EPA Diesel Emission Reduction Act (DERA) funding for vehicle replacements.
- On-going work with Direct Energy as part of tenant value chain to purchase Renewable Energy Credits and agreement with RI Energy/NRG for purchase of 100% green energy.
- Partnership with City of Providence, environmental regulatory agencies, and Save The Bay (NGO) concerning the restoration of an adjacent brownfield and integration into an Urban Coastal Greenway.

Recommendations from this verification review include:

- Continue to share the results of this verification report with stakeholders through WTS's website and actively develop actions plans.
- Develop strategy to meet environmental compliance audit criteria 5.3.2. The baseline environmental compliance audit of WTS operations will serve as baseline for continual improvement and support elevated levels of Green Marine Performance Indicator 5 – Environmental Leadership requirements.
- Coordinate with Republic Services for monthly waste inventory; identify all waste streams and material recycling/reuse efforts to define landfill diversion percentage and opportunities for improvement.
- Modify IMS915 Environmental Management System Policy to include commitment to waste minimization and recycling as part of community/environmental leadership performance indicators.
- Expand Section 5 of IMS915 5.3 Pollution Risk and Prevention Pan Annual Course and existing Safety training to include waste management module focusing on RIDEM/EPA requirements such as waste generator status, handling and management, disposal and recordkeeping and valorization. This can also be developed through tool-talks or similar communication channels.
- Finalize incident identification and reporting procedure, train, and communicate with staff to support complaint and environmental reporting requirements and develop log for tracking.
- Consider modification to model lease contract clauses to promote tenant commitment to Green Marine where feasible.

The verifier wishes to thank WTS and its employees for making the verification process most enjoyable. Of note I would recognize the preparedness of the facility employees, flexibility in scheduling, accessibility of the requested documentation, and engagement of senior leadership in the review.

Disclaimer on Use of Verification Report

This report was specifically developed for use by WTS. The process by which this verification review was conducted is consistent with generally acceptable environmental auditing practices and the best professional judgement of the verifier. The verifier used established checklists/protocols supplied by Green Marine and information from WTS. Protocols were based on Green Marine Environmental Program requirements. It should be understood that the review consisted of evaluating a sample of facility environmental practices and documentation and was conducted in a short time span relative to the review period. Efforts were directed toward validating claimed environmental programs, management practices, and performance during the period of review. This verification report should not be interpreted as a guarantee of compliance with all applicable or relevant environmental legal obligations and WTS requirements.

2. INTRODUCTION

- Description of participating company (name, business sector, number of employees, overview, location(s), types of activities, facilities and cargo handled, and the company's designated authorities and corresponding responsibilities for environmental management and certifications related to environmental management, such as ISO 14001)

WTS is an all-inclusive terminal management and stevedoring company that focuses on bulk, break bulk and project cargo handling https://www.provport.com/waterson/waterson.html. WTS operates stevedoring operations at two other locations – the Port of Davisville in North Kingstown, RI and Port of New Bedford, MA. Neither of these locations are active participants in the Green Marine program at this time. WTS joined Green Marine in 2018.

WTS is the terminal operator for ProvPort and maintains operations including tenants. (Orsted, Univar USA, Sea-3 Providence LLC, Heidelberg Materials, Radius Recycling, Washington Mills, Morton Salt, Grimaldi Lines, WIND cable, St. Mary's Cement, New England Petroleum Terminal). WTS has numerous other customers who do not have infrastructure within the facility or lease property. Most are short term dock storage (for instance export vehicle customer, Grimaldi Lines). Bulk products imported include petroleum, asphalt, cement, LPG, aluminum oxide, project cargos and road salt imports. Primary exports are scrap metals, automobiles and project equipment and materials. Various other bulk products pass through WTS, utilizing the intermodal opportunities presented by the interface of two major highways (Interstates 95 and 195), the deep-water seaport, and a railway capable of supporting double stack service. WTS's NAICS is 488320 – Marine Cargo Handling.

WTS's ProvPort operations cover over 115 acres and contain 4,200 feet of berthing space, 130,000 square feet of covered storage, and more than 25 acres of open lay down area. Rail service includes three rail spurs allowing direct vessel-to-rail transfers, indoor rail, and alongside rail at the open lay-down area. All storage areas, whether covered or open, are served by adjacent rail.

In 2023, WTS received ISO 14001:2015, 45001:2018 and 9001:2015 certification from BSI Registration.

3. PREVIOUS VERIFICATION

EA completed WTS's 2018 and 2021 verifications. Since that baseline verification, specific improvements implemented by WTS and documented in this recent assessment that demonstrate WTS's commitment to continual improvement include:

- Development and implementation of Spill Prevention Control and Countermeasures (SPCC) plan.
- Obtained ISO 9001 (quality), 14001 (environmental), and 45001 (occupational health & safety) third-party certification of integrated management system by BSI for all WTS operating terminals in future.
- Documentation and organization of binders addressing Green Marine performance indicators.
- Implementation of anti-idling policy.
- Greenhouse gas (GHG) emissions inventory.
- Good housekeeping BMPs detailed in Section 2.2.7 of the facility Stormwater Management Plan (SWMP).
- Addition of mobile crane spill response kits where none were in place in 2019.
- Administrative office recycling program for paper, plastics, and aluminum cans.
- Collaboration/partnership with stakeholders to position and develop facility as a major wind energy hub.

WTS joined Green Marine in 2018 and completed its initial verification in 2019 and continues to build and improve upon its environmental program performance. WTS improved scores in three performance indicators e.g., 1, 2, and 3. Two performance indicator levels were reduced from levels claimed for indicators 5 and 7.

4. PURPOSE, SCOPE, AND METHODOLOGIES

- Clearly indicate the purpose and objectives of the verification.

The purpose of the review was to provide verification of Green Marine environmental program requirements and levels claimed on the 2023 annual Self-Evaluation for the WTS ProvPort (Providence, RI) facility.

- Clearly state the verifier's mandate, and any exclusions.

The period of review is calendar year 2022 and 2023.

- Clearly state it is not part of the verifier's mandate to verify the client's compliance with any environmental laws or regulations. It is, however, the verifier's role to verify whether the client has a process in place to ensure the enterprise has reasonable knowledge of its legal and regulatory obligations (Level 1).

See Disclaimer – this verification report should not be interpreted as a guarantee of compliance with all applicable or relevant environmental legal obligations and client requirements.

- Explain the verification's boundaries, specifying what has been covered and what has been excluded (e.g., activities, operating sites, terminals, or individual ships not participating in the program).

Verification boundaries are the WTS facility located on ProvPort (Providence, RI) located at 35 Terminal Road in Providence, RI 02905.

- Indicate the verification date to provide a timeframe and context.

On-site verification occurred on 10 April 2024.

- Indicate whether the verification included a site visit.

Verification included a site visit.

- Briefly explain the methods and procedures used to conduct the verification (e.g., evidence collected, interviews conducted, sample verification of documents, site visits, etc.).

Methods and procedures used to conduct the verification are defined in EA's proposal to WTS dated 8 January 2024 to include:
1. Pre-assessment review of publicly available information, Self-Evaluation Smart Guide, logistics coordination;
2. A site review to meet with WTS stakeholder, review site operations and review documentation; and
3. Post-assessment development of Smart Guide submission and Verification Summary Report and coordination with WTS/Green Marine.

- List all the people who participated in or oversaw the verification or who were interviewed during the verification process, as well as their position within the company and their role during the verification.

Stephen Curtis, Facility Manager/Facility Security Officer (FSO) – (Interviewee & Sponsor)
John Gustus, Director of Operations (Interviewee)
John Giarusso, Safety & Operations Manager (Interviewee)
Kevin Sorenson, Lead Mechanic (Interviewee)
Chris Waterson, CEO and President (Interviewee)

5. VERIFICATION RESULTS AND RECOMMENDATION

The section below provides a detailed comment (finding) and conclusion (and/or recommendations) for each criterion and level claimed. Each comment/finding includes the following basic elements:

Claimed Status:
Indicate whether the criterion was claimed, or not, or not applicable.

Condition:
Indicate if requirements (pertaining to the specific criterion) are met or not. This is supported by evidence from the verification work.

Cause:
Provide arguments as to why requirements were or were not met (e.g., clear/unclear procedures, sufficient/lacking resources, adequate/insufficient documentation, understood/misinterpreted requirements, etc.), and provide concrete examples of documentation verified and/or other information collected to support these findings.

If "n/a" is selected for a criterion, briefly explain the reason.

Effect:
State the result of the condition, if possible, in quantifiable terms (e.g., increased/reduced spill risks, change in GHG emissions as a percentage, amount of financial savings, or reduced/increased number of complaints, etc.)

Conclusions/Recommendations:
Conclusions are clear and direct, and recommendations are actionable.

List of Documents Reviewed/Provided by WTS:

- WTS Oil Spill Prevention, Control and Countermeasure Plan (SPCC) ProvPort Facility 35 Terminal Road Providence, RI 02905 Revision 1dated 1 January 2024.
    - Monthly Spill Prevention Inspection Record 02/26/2024 inspection form
- Stormwater Management Plan ProvPort, Inc., Providence, RI RIPDES Authorization No. RIR50Q054 Prepared for WTA, LLC by Wilcox & Barton, Inc., revised April 2022.
    - 4 quarterly and sampling - $25K
- WTS website https://www.provport.com/waterson/waterson.html
- 2023 completed Smart Guide – Terminals received electronically through Green Marine web portal.
- Integrated Management System (IMS) Manuals
    - IMS915 – Environmental Management System and SOPs
    - IMS925 – Checklists and Forms
- Storm Water Plan Binder with tabbed sections.
- Terminal Tariff No. 008, Governing Rules, Regulations, Charges and Conditions for Terminal Services and Use at ProvPort, Inc., effective 1 January 2022, as amended
- Green Marine binder or "playbook"
- Daily Equipment Inspection Reports (various sampled)
- WTS Equipment Schedule 2023 (MS Excel spreadsheet)

- RIDEM DERA Grant document 12/1/21 – 9/30/23 AWARDED for 2021 Disel Emission Reduction Act National Grants for vehicle replacement project. $94K for replacement of several diesel-powered class 7/8 vehicles with 2019 model year or newer or Tier ¾ certified engine.
- RI Energy (ICF Fleet Advisory Services) Fleet Electrification Assessment dated 2022 August. Assesses economic feasibility of 56 vehicles including 22 on road and 34 non-road vehicles. Identified 22 EV options for on road fleet and 14 beneficial to convert over next 12 years. 14 vehicles replacements and NPV and total saving presented.
- BSI ISO 14001:2015, Certificate No/ 777873, BSI (Registrar),effective date 7/17/23/ to 7/16/26.
- Example invoices:
- October 2023 Igus feasibility study for shore power for Berths 5 & 6 directly related to offshore wind vessel fleet.
- EMS Summary of Environmental Reporting and Compliance Requirement.

PERFORMANCE INDICATOR 1 – GREENHOUSE GASES AND AIR POLLUTANTS

Does the participant ensure that it is monitoring regulations?	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS utilizes the following sources to monitor regulations: o Websites e.g., Rhode Island Department of Environmental Management (RIDEM), RI Coastal Resources Management Council (RICRMC), U.S. Environmental Protection Agency (EPA), etc. o Regulatory agencies contracts e.g., EPA Ports Initiative, RIDEM e.g., Office of Air Resources, Office of Site Remediation, etc. o Trade journals and magazines. o Consultants e.g., Wilcox & Barton, GZA, KLR, etc. o Advocacy organizations e.g., American Association of Port Authorities (AAPA), Propeller Club Port of Narragansett Bay, North Atlantic Ports Association (NAPA), Northeast Diesel Collaborative (NEDC) Ports & Goods Movement Workgroup. o NGOs e.g., Save The Bay. o Institutional e.g., URI, Bryant University. o ProvPort Board of Directors.
Effect	Awareness and competence of applicable and emerging regulatory requirements.
Conclusion/ Recommendation	Continue methods and approaches noted above.
Level 1 achieved.	
1.2.1 *Implement policies and communications that discourage idling of vehicles powered by Internal Combustion Engines. Include at a minimum, participants own road, off-road, and unlicensed vehicles.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Section 4 Environmental Protection Elements, 4.3 of IMS915 – Anti-Idling Policy. Policy includes purpose, applicability, definitions, diesel motor vehicle engine idling, exceptions to policy and references. The policy is applicable to all vehicles and equipment, regardless of location and operations. Specific idling policy directives include: o *Road Vehicle Idling*: All roadgoing vehicles shall observe a 15-minute idling limit, regardless of operation. Once 15 minutes of idling has been reached, the vehicle's engine shall be deenergized. o *Off-Road Vehicle Idling*. All non-road vehicles and equipment, such as wheel loaders, excavators, non-road dump trucks, etc., shall observe a 60-minute idling limit. Once 60 minutes of idling has been reached, the vehicle or equipment's engine shall be deenergized. • Anti-Idling Policy memorandum posted a main security gate and discussed with gate agents. Agents provided Security Guard Post Orders in Site Operations Plan with anti-policy and congestion mitigation plan. • RI Energy (ICF Fleet Advisory Services) Fleet Electrification Assessment dated 2022 August. Assesses economic feasibility of

	56 vehicles including 22 on road and 34 non-road vehicles. Identified 22 EV options for on road fleet and 14 beneficial to convert over next 12 years. 14 vehicles replacements and NPV and total saving presented.
Effect	Reduced GHG and air pollutant emissions.
Conclusion/ Recommendation	• Follow policy and procedure and monitor results.
1.2.2 *Promote sustainable transportation practices by employees.* *Examples: Incentives for public transport and carpooling, reorganization of business travel. Installation of bicycle racks, etc.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS continues to evaluate sustainable employee transportation practices. Most employees are scattered regionally making public transit or rideshare options limited due to schedule, traffic, safety and accessibility to ProvPort from transit routes. • WTS has installed a bicycle rack outside the main office off Terminal Road outside the port. While it may not be used by WTS staff, there is a port benefit for vessel crew looking to head ashore and avoid taxis, rideshare, etc. for travel into the City of Providence. Electric bicycles provided through the City of Providence SPIN program are routinely used by tenants and users. • In 2023, WTS installed an electric vehicle (EV) charging station outside the Terminal Road main offices for public use. WTS is further evaluating fleet electrification options.
Effect	Sustainable employee transportation further reduces GHG emissions.
Conclusion/ Recommendation	• WTS continues to evaluate options and incentives for public transport and carpooling, reorganization of business travel. Installation of bicycle rack provides option for crew shore leave. • New EV charging station provides incentive to employees.
1.2.3 *Implement measures to reduce truck congestion and idling.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See 1.2.1 – Guard Post Orders posted on wall of security shed. • Section 4.3 of IMS915 includes an anti-idling policy. The policy's procedure has a bypass lane trigger to reduce truck congestion and idling. Specifically, "for six or more inbound vehicles outside of the main security checkpoint waiting for security clearance the use of the secondary inbound traffic lane is authorized. Port personnel should utilize the roving patrol guard to inspect security credentials and assist in moving traffic towards the secondary inbound lane to reduce waiting/vehicle idling times". • WTS is decarbonizing owned fleet assets through use of grants for equipment replacement: o RIDEM DERA Grant document 12/1/21 – 9/30/23 AWARDED for 2021 Disel Emission Reduction Act National Grants for vehicle replacement project. $94K for replacement of several

	diesel-powered class 7/8 vehicles with 2019 model year or newer or Tier ¾ certified engine. o RI Energy (ICF Fleet Advisory Services) Fleet Electrification Assessment dated 2022 August. Assesses economic feasibility of 56 vehicles including 22 on road and 34 non-road vehicles. Identified 22 EV options for on road fleet and 14 beneficial to convert over next 12 years. 14 vehicles replacements and NPV and total saving presented.
Effect	Reduced GHG and air pollutant emissions from idling.
Conclusion/ Recommendation	• Monitor and evaluate.
Level 2 achieved.	
1.3.1 *Complete an annual report on GHG emission.* *Note: Include Scope 1 at a minimum, and Scope 2 is recommended, as defined by the GHG Reporting Protocol. See Annex 1-A.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS presented a MS Excel 2023 GHG emission inventory developed by KLR (consultant) to support planned Environmental, Social, and Governance (ESG) reporting. The inventory includes only Scope 1 GHG and is based on the WTS annual asset inventory of mobile and fixed emission sources. Data collected includes equipment type, year, make, model location, fuel type, emission factors, etc. Date is reported for CY's 2012, 2022 and 2023. • Emission factors and conversion citations are included in worksheet • Reporting for Scope 1 meets Annex 1-A requirements; emission factors are from IPCC GHG protocols using EPA references.
Effect	Tracking of GHG emissions by scope/equipment type can lead to reduced GHG and air pollutant emissions.
Conclusion/ Recommendation	• Expand to include Scope 2 (recommended). • Provide summary breakdown by GHG scope (Scope 1 minimum requirement).
Level 3 achieved. **Level 4 not claimed or justified – STOP.**	

PERFORMANCE INDICATOR 2 – SPILL PREVENTION AND STORMWATER MANAGEMENT

Does the participant ensure that it is monitoring regulations?	
Condition	Met.
Cause	• WTS utilizes the following sources to monitor regulations: o Websites e.g., Rhode Island Department of Environmental Management (RIDEM), RI Coastal Resources Management Council (RICRMC), U.S. Environmental Protection Agency (EPA), etc. o Regulatory agencies contracts e.g., EPA Ports Initiative, RIDEM e.g., Office of Air Resources, Office of Site Remediation, etc. o Trade journals and magazines. o Consultants e.g., Wilcox & Barton, GZA, KLR, etc. o Advocacy organizations e.g., American Association of Port Authorities (AAPA), Propeller Club Port of Narragansett Bay, North Atlantic Ports Association (NAPA), Northeast Diesel Collaborative (NEDC) Ports & Goods Movement Workgroup. o NGOs e.g., Save The Bay. o Institutional e.g., URI, Bryant University. o ProvPort Board of Directors.
Effect	Awareness and competence of applicable and emerging regulatory requirements.
Conclusion/ Recommendation	• Continue methods and approaches noted above. • Update and complete SWMP-related employee training.
Level 1 achieved.	
2.2.1 *Perform vehicle and machinery fueling, lubrication and maintenance in an adequately equipped designated area and/or at a minimum distance of 30 m (100 ft) from the water and at a minimum distance of 15 m (50 ft) from a tributary (e.g., catch basin, ditch, storm drains) unless the area is covered by or is part of a permitted and properly operating stormwater management system. If these requirements cannot be met, alternative pollution prevention measures must be taken (e.g., watertight lids, rubber rugs, retention pans).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS has a Stormwater Management Plan (SWMP) associated with Rhode Island Pollutant Discharge Elimination System (RIPDES) permit #RIR50Q054 (July 2019). The SWMP defines monitoring and reporting requirements, roles, and responsibilities and BMPs. • WTS mechanics perform lubrication and maintenance for a fleet of ~30 vehicles and equipment e.g., forklifts, cranes, etc.). All services (other than cranes) are performed inside the Maintenance Shop building located over 1,000 ft from the Providence River (nearest body of water – see Figure 2 SWMP). Interior maintenance bays drain to an oil-water separator. • SWMP Section 2.2.7.2 details vehicle/equipment fueling. o IMS915 A3 Remote Fueling SOP encompasses all remote fueling operations on any of the ProvPort leased Marine Terminals. o Motive ship-to-shore cranes are fueled within 100 ft from the water by mobile source; alternative pollution prevention measures used

	include spill kits on the cranes and contractor fuel trucks, storm drain covers, and dock booms. o WTS uses a qualified and licensed contractor (Dennis K. Burke, Inc.) for bunkering. The contractor is insured and must have their own spill plan. The contractor fuels WTS's cranes utilized on the berths using WTS's 1,500-gallon mobile diesel fuel truck. Cranes and tank trucks remain within the facility. Fleet vehicles within the facility are also refueled using the tank truck. The fuel vendor and the tank truck are equipped with spill kits. A 100-gallon fuel tank is kept on a truck that is stored inside the Maintenance Building and is used for minor refueling of vehicles. o Mobile fuel truck is outfitted with spill kit and staff are trained on spills per WTS operations and SPCC plan. For mobile harbor cranes, a designated specialized bunker vendor is utilized (third party) due to bunker volumes. Mobile harbor crane fuel tanks are double walled as a means to further prevent leaks/spills. Copies of insurance are required of vendors and each company must have a spill plan on file. Vehicle and machinery repairs occur inside the WTS mechanic shop where lubricating fluids are stored. Currently, there is an OWS within the WTS mechanic shop where floor drains run to, this system is pumped out along with floor drains on an annual basis. o WTS's maintenance shop Box Truck is equipped with mobile spill response materials e.g., pigs, blankets, oil-sorbent, PPE, etc. The Box Truck supports WTS maintenance activities at locations around the facility where maintenance is performed outside the shop. • IMS915 A3 Remote Fueling SOP. • Company policies that require this criterion to be enforced are the; WTS operations manual, ProvPort/WTS Storm Water Management Plan, WTS SPCC plan. • Manuals include: WTS Ops manual, WTS SPCC manual, ProvPort/WTS SWMP manual, IMS915.
Effect	Prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• Continue to follow SWMP, SPCC and IMS915 A3 requirements. • Addition of SPCC plan noted as improvement implemented since 2022 verification.
2.2.2 *In areas draining to surface water, use, inspect and ensure proper maintenance of secondary containment for stationary devices and equipment that can potentially leak, or which need to be resupplied periodically (e.g., generating sets, compressors). Use a risk-based approach to determine the adequate volume of each secondary containment to contain anticipated spills or leaks. All employees using such devices and equipment must be aware of the procedure to follow (what to do, who to contact) in case of a spill or leak (e.g., proper signage visibly posted directly on devices and equipment, internal emergency number, annual employee training).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Inspections for secondary containment are part of the operations plan requirements for the SWMP, SPCC, and WTS operations plans. Controls noted include:

	○ Quayside land utilizes sediment containment booms to filter sheet flow runoff from berth areas. ○ Stationary and mobile spill kits noted throughout the terminal. ○ Mechanics utilize BMPs for vehicles and equipment including drip pans. ○ Petroleum, oil, and lubricants (POLs) are stored within OSHA approved containment or cabinets generally inside the maintenance shop. ○ In use POLs in shop areas are on containment pallets ○ Street side storm drains and catch basins utilize filtration fabrics. • The SPCC and SWMP provide inventories of exposed materials, methods, and locations of storage. The SPCC provides tank inventory. Both plans detail employee training and spill prevention and response procedures in addition to IMS915 A9 Spill Response. Figure 2 of the SWMP illustrates site drainage areas. • The SPCC and SWMP were developed following a risk-based approach and developed by qualified environmental professionals. The SPCC is certified by the RI Professional Engineer. • Stationary equipment inside the Maintenance Shop includes compressors, grinding wheel, generators, etc., where a spill kit is located. WTS maintains a 24/7 standby contract for major response (>5-gal. per IMS915 A9) with Clean Harbors and self-performs smaller cleanups. • 2023/2024 Employee Training for Stormwater Management & Planning Training was reviewed. Training was provided by Wilcox & Barton (consultant) and documented with an employee training sign-in sheet. Training addressed MSGP requirements and specific drainage, pollutants, and BMPs for ProvPort. SPCC training for oil-handlers will be delivered in 2024. • Housekeeping was excellent and a few minor areas of leaks/spills were noted on the pavement. Tenants are responsible for management in their respective areas and the tariff requires tenants to obtain and hold required environmental permits and management plans identifying WTS at the leaseholder.
Effect	Prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• Continue to follow and monitor SWMP and SPCC BMP requirements.
2.2.3 *Implement inspection and maintenance procedures for all devices and equipment (e.g., tanks, generating sets, compressors, landscaping equipment) that could potentially leak liquid contaminants into the environment (e.g., drainage system, natural receiving environment).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS provided 2023 Equipment Schedule inventorying assets that could potentially leak including vehicles, forklifts, cranes, loaders, excavators, light stands, yard trucks. The inventory includes all insured, owned equipment. A few assets such as compressors, generators, above ground tanks, etc. POL hydraulic oil tank (3-330-gal. double walled) inside the

	Maintenance Shop are maintained by outside vendor per contract agreement. • While all equipment is not included in current inventory, due to location of POL assets/equipment over 1,000 from water, inside shop area with contained drainage and OWS. Not included in the asset inventory, all tanks in SPCC plan are inspected daily/monthly per requirements and serves as the primary inspection and maintenance control. • Policies/procedures for inspection and maintenance are documented in IMS915. IMS925 Checklists and Forms Section 3 and Operations Manual includes: o Daily Operator Checklists (uncontrolled) for yard forklifts, trucks, cranes. o Daily Equipment Inspection Reports are completed prior to use by qualified/designated staff of any equipment and are mandatory as "pre-use staff inspections". Hard copies of inspection forms are kept within the Mechanic Shop office. Form notes items to be checked and requires inspectors to classify each item as "OK", "Needs Attention" or "Immediate Attention" required. A comment box is provided for specific comments/details. Daily Equipment Inspection Reports were reviewed L-12 228 Loader with Lead Mechanic for 2023 and comments discussed, noting form is used to prioritize maintenance and purchasing requirements. o Ad hoc maintenance inspections e.g., OWS inspection dated 15 March 2023 from Clean Harbors • Lead Mechanic has asset preventive maintenance schedule on wall board in shop noting last date of service and hours of service for each asset. Maintains folder file with all service records.
Effect	Routine equipment/asset maintenance helps prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• All insured assets are included in current asset inventory, and due to location of POL assets/equipment over 1,000 from water, inside shop area with contained drainage and OWS, and alternate inspection of tanks through SPCC, criteria is met. • Document/track corrective action follow-up on Daily Equipment Inspection Reports where "attention" is noted by inspector to demonstrate that items are addressed or prioritize for maintenance.
2.2.4 *Regularly inspect near shore and property to identify any illicit discharge. If such a discharge is identified, immediately implement corrective measures to stop contamination from the source.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS SWMP and SPCC plans detail a hierarchy of inspections which are performed by a combination of WTS and consultant resources. Inspection hierarchy discussed includes: o Daily use for equipment via shop walk throughs, general inspection; o Weekly housekeeping inspections for sweeping; o Monthly SPCC inspections and DMRs;

	○ Quarterly SWMP visual inspections and sampling; and ○ Annual comprehensive site SWMP inspection and RIDEM landfill ELUR. ○ Section 2.2.8 of SWMP discusses dust or particle generating processes noting sweeping program requirements. Sweepings are managed through soil broker, Brighter Horizons, who samples, characterizes, and manages disposal of materials at an appropriate facility. • Daily roving patrols by WTS staff during M-F business hours from 0600hrs to 1600hrs. Based on vessel 24/7 cargo opportunities staff may also perform after hours and weekend roving. On call staff are available during downtime periods. To supplement patrolling, WTS utilizes a security and safety patrol with contracted security company, Securitas. Roving patrols take place 24/7 365 days a year and report any safety or security item. • Terminal Tariff No. 008 applicability to illicit discharges: ○ Part 780 Discharge of Ballast, Rubbish or Sewage notes **"**pumping ballast water or discarding rubbish, garbage, dunnage, sewage or any debris into the Providence River or onto the property of ProvPort may be restricted by law, any requests to discharge shall be sent to the appropriate authority with a copy to ProvPort. All vessels must comply with all Federal and State regulations and are liable for all violations. Vessels or their agents must utilize the certified carriers on file with ProvPort for the removal of any garbage or oily waste. All expenses related to the disposal of any materials left on the facility property with or without permission is the full responsibility of the vessel." ○ Part 782 Discharge of oil into water is prohibited states "no person or vessel shall pump, discharge or deposit or cause or permit to be pumped, discharged, or deposited or to pass or to escape in or into the waters of ProvPort any of the following materials or substances: oil, spirits, combustible liquids, coal tar, refuse, residual products of coal, petroleum, asphalt, bitumen or other carbonaceous materials. Any accidental discharge shall be immediately reported to ProvPort and the person or vessel responsible shall report the spill to USCG and make all efforts to contain the spill." ○ Part 750 Berths notes "it is the responsibility of the tenant business and/or stevedore company using any berth and dock apron for vessel operations to return the berth to its condition before such work commenced. The areas must be clear and free of any debris, remaining cargo, equipment or other item associated with the cargo operation within twenty-four (24) hours after the completion of the vessel." • Storm Water Plans and Document Binder – Tab D Routine Facility Inspection Reports document Stormwater Industrial Routine Facility Inspection Reports dating back quarterly to 2020 reviewed.

	• Storm Water Plans and Document Binder – Tab E MSGP Quarterly Visual Assessment Forms for RIPDES Permit #RIR50Q054 – monitoring and sampling forms quarterly back to 2020 reviewed. • Storm Water Plans and Document Binder – Tab F Comprehensive Site Inspection Reports RIPDES permit #RIR50Q054, 2020 reviewed and 2021 still being finalized. • Training conducted by both WTS and external consultants; training documentation noted associated with this performance indicator: o NetDMR permittee and data provider training (RIDEM on-line) for reporting RIPDES inspection data electronically. o SWMP Annual Training provided by Wilcox & Barton (January 2024 for S. Curtis & G. Waldron).
Effect	Routine inspection helps prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• SWMP notes Stormwater Pollution Prevention Team – clarify roles and responsibilities for WTS staff. • Complete SPCC oil-handler training.
2.2.5 *Check for visible sheen on, colour and odour of water collected in secondary containments and excavation pits or extracted from monitoring wells. If there is a doubt about its quality, the water must be sampled, analyzed for contaminants of concern and managed appropriately or treated prior to being discharged into the environment.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Inspections are detailed in criterion 2.2.4. • The SPCC details inspection requirements for stationary tank containments. Currently, all WTS tanks are located inside, double-walled and subject to routine inspection. • The SWMP identifies six sampling points covering all ProvPort property and areas under WTS management. Environmental consultants (Wilcox & Barton) perform quarterly sampling, lab analysis and reporting to RIDEM in accordance with Table 3 of SWMP (analytical monitoring program under RIPDES permit). • Currently there are only two retention ponds within the terminal operations. Each is part of a storm water treatment system (south end of the port near Save The Bay Campus) and (Southwest corner near Johnson & Wales campus) for storm water runoff control. Ponds are routinely inspected and recorded annual reports filed by environmental consultants. Quarterly storm water runoff samples taken throughout the terminal property are analyzed and visually inspected with reports logged into the company SWMP plan. • Southern portions of the WTS property have land use controls or restrictions from past uses. These parcels are managed through coordination with RIDEM and have location specific requirements for management of soil or groundwater from monitoring well. • Third party environmental vendors (or licensed environmental engineers) are required for any project-based work by tenants and

	WTS. All vendors must comply with RIDEM/CRMC and applicable City/State requirements for monitoring and reporting. • Facility is an active waterfront operating 24/7. Several active capital projects on tenant sites involving excavation, etc. which are managed by tenants through temporary and permanent stormwater quality BMPS, some involving earthwork.
Effect	Routine inspection helps prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• WTS (and tenants) are actively monitoring and managing water quality in accordance with the SWMP as observed through permit monitoring and project oversight of construction activities.
2.2.6 *Have an emergency spill kit readily available near any facility or operation where a spill or leak is likely to occur. Ensure employees are trained to use these kits and to respond to accidental discharges. Spills or leaks must be cleaned-up immediately when noticed and contaminated material must be eliminated in an authorized site.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• SWMP, SPCC and IMS915.A9.3.3a notes leak or spill of greater than five (5) gallons, procedures contained SOP-A.9 (Spill Response Procedure) will be followed. • Spill kits and their locations are identified in the SPCC and operations plan along with the inventoried stored amounts for purchasing requirements. WTS spill kits and response materials observed during site visit: o Maintenance Shop spill kit in shop area containing sorbent, pads, blankets, etc.; o Mobile harbor crane spill kits; and o Maintenance Box Truck with spill response materials for performing maintenance outside shop areas. o Exterior wash bay o A few additional spill kits are stored in self-contained barrels along adjacent quayside locations. • See criteria 2.3.3 for discussion on CY2023 reported spills/leaks. • Spill drills are part of WTS's requirements under the operations plan and part of ISO audits for training purposes. Staff routinely trained for spills, security, stormwater along with other OSHA requirements as part of our operations manual. • Standing emergency response contract with Clean Harbors for large spills. • Tenants are required to maintain their own spill response plans and requirements per their lease agreements.
Effect	Spills reduce entry of pollutants into stormwater infrastructure.
Conclusion/ Recommendation	• Spill kits are located near activities which could result in a spill/release.
2.2.7	

Implement good housekeeping practices to ensure surfaces near storm drains, dockside, or other pathways to water are clear of pollutants (e.g., solid wastes, grit, dust, paint, or paint residues).	
Claimed? ☐ Yes ■ No	
Condition	Met.
Cause	• SWMP and SPCC addresses Good Housekeeping practices. • Per SWMP Section 3.1, paved areas are swept weekly site wide, and daily in heavily trafficked areas. Areas of ship activity are swept immediately after cargo operations are completed. The scrap metals tenant is responsible for conducting daily sweeping and debris removal during transfer operations under their own SWMP along heavily trafficked interior road. • Terminal Tariff No. 008 requirements related to housekeeping: o Part 750 Berths notes "it is the responsibility of the tenant business and/or stevedore company using any berth and dock apron for vessel operations to return the berth to its condition before such work commenced. The areas must be clear and free of any debris, remaining cargo, equipment or other items associated with the cargo operation within twenty-four (24) hours after the completion of the vessel. If the area is not cleaned to the satisfaction of port management, then any appropriate actions to do so will be billed by ProvPort for all direct and indirect costs upon completion of the action." o Upon completion of cargo operations, dock areas are swept with mechanical broom equipment and/or magnets for ferrous cargoes. Routine sweeping is performed in non-dock areas and checklists managed in SWMP. • SWMP BMPs for dry bulk handling and wet areas in preparation for mechanical sweeping to reduce dust. WTS Dust control truck was observed parked in interior wash bay during April 2024 site visit. • On-going capital project activity across tenant operations result in temporary BMPs in use e.g., haul roads, drainage collection and containment. Daily sweeps of common roads by tenants in support of tariff requirements (above) for periods of heavy use. ProvPort is assessing long-term stormwater infrastructure improvements associated with planned capital improvements and modernization. • Reviewed March 2023 record o Dock Sweeping and Periodic Maintenance Exterior Grounds – documents weekly sweeping of berths. • Sweepings are accumulated, characterized, and disposed of by qualified contractor. Analytical reports, beneficial use determination and/or disposal documentation provided in Tab C of Stormwater binder.
Effect	Housekeeping helps prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• Follow SWMP requirements.
2.2.8	

Prevent discharge of wash water that could contain oils, chemical products (e.g., detergents), or residues/suspended solids into the environment via treatment or containment for example.	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS has two designated washing areas described in Section 2.2.7 of the SWMP and noted on Figure 3 of SWMP: o Interior wash bay in Maintenance Shop. Accumulated wash water is collected in an oil-water separator (OWS) connected to City sewer. Sumps/OWS cleanout is maintained by Clean Harbors, a licensed disposal contractor. Interior wash bay uses Simple Green in washing. o Exterior washing on western side . Drainage Area 3 over 100 feet from the waterfront. Washing is completed within containment blocks with containment booms; use of soaps/detergents/degreasers are prohibited, and use is limited to water wash for accumulated dust on vehicles/equipment only. Reviewed exterior wash area on 10 April 2024 site visit - signage posted "NOTICE – Vehicle Tire/Body Wash Only – No Cleaners/Degreasers". • Tariff Part 750 requirement for all users of common dock areas to sweep after completion of cargoes. SWMP BMPs for dry bulk handling and wet areas in preparation for mechanical sweeping to reduce dust. • Upon completion of cargo operations, dock areas are swept with mechanical broom equipment and/or magnets for ferrous cargoes. Routine sweeping is performed in non-dock areas and checklists managed in SWMP by both WTS sweep truck or outside vendor (Express Sweeping). • Sweepings are accumulated, characterized, and disposed of by qualified contractor (Bright Horizons). Analytical reports, beneficial use determination and/or disposal documentation provided in Tab C of Stormwater binder.
Effect	Wash water management helps prevent spills and leaks of pollutants and manage stormwater to minimize contamination to environment (both water and land).
Conclusion/ Recommendation	• Routine housekeeping/sweeping evident.
Level 2 achieved – 8 of 8 criteria met (100%).	
2.3.1 *Implement all applicable best practices of Level 2*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• All best practices in Level 2 met and implemented.
Effect	Prior absence of 2.2.7 during 2019 review – continual improvement.
Conclusion/ Recommendation	• Continue to follow and monitor SWMP requirements.
2.3.2 *Adopt a Water and Land Pollution Prevention plan that covers all sites that the participant operates on (for terminal operators, this plan must cover all terminals participating in the Green Marine program).* *Note: See Annex 2-A.*	
Claimed? ■ Yes ☐ No	

Condition	Met.
Cause	• WTS has a Stormwater Management Plan (SWMP) associated with Rhode Island Pollutant Discharge Elimination System (RIPDES) permit #RIR50Q054. The SWMP is the governing management plan for stormwater management defining monitoring and reporting requirements, roles and responsibilities and Best Management Practices (BMPs) to be employed to reduce risk. The contents of the SWMP satisfy the requirements of Annex 2-A. WTA also has a Spill Prevention Control & Countermeasure (SPCC) Plan requirements pursuant to 40 CFR 112. • WTS believes that the SWMP, SPCC and WTS Operations Manuals satisfy this criterion. WTS maintains a matrix using the Annex 2-A Level 3 requirements cross-referencing to existing plans such as the SWMP, SPCC and WTS Operations Manuals citing specific sections applicability to Annex 2-A criteria.
Effect	Water and Land Pollution Prevention Plan addresses management of activities to reduce pollutant contributions.
Conclusion/ Recommendation	• WTS has other stevedoring operations at the Port of Davisville, RI and New Bedford, MA. However, WTS is the only Terminal Operation participating in the Green Marine program, thus the Water and Land Pollution Plan only applies to this site. • Continue to follow and monitor Annex 2-A requirements in SWMP, SPCC and other documentation in crosswalk.
2.3.3 *Keep a record of all accidental discharges of pollutants into the environment that occur on the participant's operated property and report such discharges to the port authority, if applicable.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS spills are defined in IMS915 A9 Spill Response, the SPCC, and SWMP (Section 2.4 details significant leaks and spills). • Significant leaks and spills are defined in the RIPDES regulations as including but not being limited to "releases of oil or hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act (40 CFR 110.6 and 40 CFR 117.21) or Section 102 of CERCLA (40 CFR 302.4)." • In 2023, 16 reportable spills were noted/documented in Appendix D of SWMP. – two reviewed: o 30 October 2023 – leak from a RoRo truck parked dockside. Visible sheen was noted and reported. WTS used SWMP spill report form. The after action of this event included a tabletop drill which was documented. o 24 July 2023 – while making daily rounds, found two vehicles leaking oil. Forms reviewed corrective actions taken. • Past and future significant spills or leaks will be maintained in Appendix D of the SWMP to include information about spill locations, materials, quantity released, and response procedures.
Effect	Appendix D ensures appropriate SWMP and SPCC compliance.
Conclusion/ Recommendation	• Continue to follow and monitor SWMP, SPCC and IMS requirements.

2.3.4 *Keep a registry of all owned and leased fixed, portable, and mobile (e.g., forklifts, mobile cranes) hydraulic equipment operated near the shore. At least for each owned equipment, assess the technical feasibility as well as modernization and maintenance costs of switching from conventional to inherently and readily biodegradable, non-toxic, and non-bioaccumulative lubricants.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS provided 2023 Equipment Schedule inventorying assets that could potentially leak including vehicles, forklifts, cranes, loaders, excavators, light stands, yard trucks. • WTS provided an April 2024 memorandum from the Director of Operations which evaluated the feasibility of substituting traditional lubricants with biobased lubricants to reduce POL using three assessment criteria: technical specification, product performance and cost impact for two owned asset classes - Liebherr LHM550 mobile crane and forklift. The memo noted lack of product certification and warranty coverage, increased cost, and multi-mission use of equipment which concluded substitution is not feasible at this time. The memo includes product specification sheets for several traditional and biobased products for comparison. Evaluation of product cost, modernization labor was factored into evaluation.
Effect	Consideration of alternative non-toxic lubricants where feasible.
Conclusion/ Recommendation	• Continue to monitor and evaluate feasibility.
Level 3 achieved.	
2.4.1 *Implement a documented Preventive Inspection and Maintenance program for vehicles and equipment, containers and tanks, and any associated conveyance systems (e.g., conveyor, aboveground piping, transfer hoses) used exclusively for the participant's direct activities and which might release discharges into the environment (fuel, lubricants, etc.).* *Note: See Annex 2-B,*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS has a Preventive Inspection and Maintenance (PMS) program which is documented in IMS920 Section 15 - Preventive Inspection and Maintenance (PMS) program. Copies of the PMS were reviewed with the Lead Mechanic during the site review. The documented program meets Annex 2-B requirements. The PMS program is appropriate for the size and scale of the WTS operations. • 2023 asset/equipment inventory (30 assets) was provided for cranes, loaders, end dumps, forklifts, excavator, yard trucks, support vehicles, car yard, road fleet and assorted equipment. • Above ground tanks are not included in the PMS system as they are covered under the SPCC program inspection requirements. Tanks are maintained by external parties as needed when maintenance is noted. • In-place PMS program is paper-based and administered by experienced Lead Mechanic. o Asset inventory is updated at least annually;

	○ Maintenance Shop Lead Mechanic maintains the last date of services and hours of service on a written white board in the shop office. 250 hours of service is the target for maintenance, but can be sooner or later based on operational requirements; ○ Lead Mechanic completes a daily written rundown of shop maintenance activities for the day; assignments are made; ○ Maintenance activities (repair and preventative) files are reflected in a spreadsheet. Director of Operations maintains spreadsheet through coordination with mechanics. Parts used and mechanic hours dedicated to the task are tracked. Product manuals/specifications determine purchasing requirements. ○ Daily Equipment Inspection Reports from the mechanics are reviewed by Equipment Maintenance Manager for approval. • Section 3.3 of the SWMP discusses preventive maintenance, and a preventive maintenance team duties and responsibilities was provided, but no detailed list of all assets/equipment and defined PM inspection and requirements. • IMS920 Section 15 addresses Annex 2-B through: ○ Formal PMS team; ○ Asset specific written workbooks; ○ Record of deficiencies and anomalies, repairs and/or replacements, and follow-up actions in inspection checklists; ○ Centralized management of change responsibility by Lead Mechanic if the equipment being used and/or the regular inspection or maintenance routine undergoes any change; and ○ Recognized boundaries and documented service contracts for external vendor-maintained equipment such as part washer, hydraulic oil tanks, etc.
Effect	Effective PMS program reduces leaks or spills and enhances operational performance of assets/equipment to reduce emissions, etc.
Conclusion/ Recommendation	• PMS program documented in IMS920 Section 15 – area for improvement in 2022 verification – continual improvement.
Participants must also fulfill either criterion 4.2 OR all the following 4.3 to 4.5 criteria.	
2.4.2 *Develop and adopt a Stormwater Management Plan.* *Note: See Annex 2-C.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• A Stormwater Management Plan (SWMP) per Annex 2-C is a document developed by a qualified environmental professional that guides processes and decisions to decrease the likelihood of contaminating stormwater runoff and to manage impacted stormwater. • Component elements of the SWMP are also addressed in the Land and Water Pollution Prevention Plan discussed in criterion 2.3.2. • WTS has a Stormwater Management Plan (SWMP) associated with Rhode Island Pollutant Discharge Elimination System (RIPDES) permit #RIR50Q054. The SWMP is the governing management plan for stormwater management defining monitoring and reporting

	requirements, roles and responsibilities and Best Management Practices (BMPs) to be employed to reduce risk. • WTS believes that the SWMP, SPCC and Operations Manual satisfy this criterion. The SWMP incorporates the requirements of Annex 2-C and was prepared/certified by a qualified environmental professional in accordance with 40 CFR 122 and RIPDES General Permit requirements.
Effect	Stormwater management plan defines sources, means, methods, and responsibilities to manage impacts to stormwater infrastructure and receiving receptors.
Conclusion/ Recommendation	The contents of the RIPDES SWMP and Operations Manual satisfy the requirements of Annex 2-C.
2.4.3, 2.4.4 and 2.4.5 *Collect and treat stormwater using an appropriate stormwater treatment system.* ***2.4.4****. Inspect and maintain stormwater treatment systems on a regular basis or according to the manufacturer's specifications to ensure good performance of the systems.* ***2.4.5****. Sample and analyze treated stormwater routinely to ensure proper functioning of treatment equipment and infrastructure. Samples must be collected following a recognized/approved procedure and analyzed by an accredited laboratory.* *Note: Stormwater treatment must be adapted to the contaminants present (e.g., catch basins, bioswales, oil separators, hydrodynamic separators, or any other type of simple or complex treatment system).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Stormwater collection, conveyance and treatment controls observed at WTS include: o Porous pavement in new RoRo parking and laydown area near Johnson & Wales campus; o Retention pond (see below); o Grassed and paved channels; o Filter lined catch basins; o Filter booms and socks; • Inspection and sampling are performed by Wilcox & Barton, qualified Environmental Professional, per the RIPDES general permit requirements; analytical testing is performed by a National Environmental Laboratory Accreditation Program, or NELAP certified lab. • WTS has a Stormwater Management Plan (SWMP) associated with Rhode Island Pollutant Discharge Elimination System (RIPDES) permit #RIR50Q054 which includes an approved storm water collection system in the car yard storage lot (Lot 288 Upper). The area is included in the existing RIPDES SWMP (Drainage Area #5) and includes Sampling Point #4. The treatment system includes detention basins with sand filter discharging via outfall to Providence River. This sampling point is subject to Sector Q benchmark monitoring parameters in the existing permit/SWMP. • WTS has a storm water treatment system pilot for the dock area planned for berth #2 in future. System will include trench and sock filter treatment. The pilot project has been designed (plans reviewed) and is in the budgeting phase. Current sampling points are along dock edge after containment booms. This pilot project will determine if collection

	and treatment is effective before implementing similar system for all dock drainage areas.
Effect	Stormwater BMPs in-place to reduce impacts to receiving waters.
Conclusion/ Recommendation	The stormwater treatment system in-place on Lot 288 Upper includes retention and sand filter treatment (approved by RIDEM). Pilot projects planned for additional treatment along active dock waterfront in future.
Level 4 achieved. **Level 5 not claimed or justified – STOP.**	

PERFORMANCE INDICATOR 3 – DRY BULK HANDLING AND STORAGE

Does the participant ensure that it is monitoring regulations?	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS utilizes the following sources to monitor regulations: o Websites e.g., Rhode Island Department of Environmental Management (RIDEM), RI Coastal Resources Management Council (RICRMC), U.S. Environmental Protection Agency (EPA), etc. o Regulatory agencies contracts e.g., EPA Ports Initiative, RIDEM e.g., Office of Air Resources, Office of Site Remediation, etc. o Trade journals and magazines. o Consultants e.g., Wilcox & Barton, GZA, KLR, etc. o Advocacy organizations e.g., American Association of Port Authorities (AAPA), Propeller Club Port of Narragansett Bay, North Atlantic Ports Association (NAPA), Northeast Diesel Collaborative (NEDC) Ports & Goods Movement Workgroup. o NGOs e.g., Save The Bay. o Institutional e.g., URI, Bryant University. o ProvPort Board of Directors.
Effect	Awareness and competence of applicable and emerging regulatory requirements.
Conclusion/ Recommendation	Continue methods and approaches noted above.
Level 1 achieved.	
3.2.1 *Collect cargo residues on the ground as soon as possible using methods that minimize dust generation (e.g., water spraying, vacuum sweeping, etc.).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS Operations Manual, SWMP, and Port Tariff define BMPs for routine sweeping and after cargo operations. For cargos that create dust, water spray towers and truck watering of the docks are methods used. WTS SWMP also has BMP guidance and Section 2.2 covers potential pollutant sources to include cargo residues e.g., dust, ferrous and non-ferrous debris, other. Equipment includes water spray towers, water trucks, sediment/containment booms, mechanical sweeping attachments. • Upon completion of cargo operations, dock areas are swept with mechanical broom equipment and/or magnets for ferrous cargoes. Routine sweeping is performed in non-dock areas and checklists managed in SWMP. Daily Boom and sweeping logs are kept in SWMP manual. Sweeping is conducted by WTS or contracted vendors (Express Sweeping). • Tariff Part 750 requirement for all users of common dock areas to sweep after completion of cargoes. SWMP BMPs for dry bulk handling and wet areas in preparation for mechanical sweeping to reduce dust.

	• Active bulk piles are worked to minimize peaking when necessary for compaction, boomed and/or tarped if long term stored.
Effect	Management of cargo residues from ground reduced handling, transportation, and storage of dry bulk impacts to stormwater.
Conclusion/ Recommendation	• Continue to follow and monitor Tariff and SWMP requirements.
3.2.2 *Ensure that collected cargo residues are properly stored, recovered and/or disposed of.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See criterion 2.2.7 for additional discussion. • Stormwater Management Plan (SWMP) Section 2.2 covers potential pollutant sources to include cargo residues e.g., dust, ferrous and non-ferrous debris, other. • Cargo residue sweepings of the docks/common areas and roadways are collected into a designated block and containment boom lined bin. Collected pile is sampled biannually or quarterly for third-party pickup and disposed of at an offsite licensed receiving facility. Characterization and chain-of-custody documentation is located in the WTS Green Marine manual and WTS SWMP binders. • SWMP BMPs for dry bulk handling and wet areas in preparation for mechanical sweeping to reduce dust. • Terminal Tariff No. 008 requirements related to housekeeping: o Part 750 Berths notes "it is the responsibility of the tenant business and/or stevedore company using any berth and dock apron for vessel operations to return the berth to its condition before such work commenced. The areas must be clear and free of any debris, remaining cargo, equipment, or other items associated with the cargo operation within twenty-four (24) hours after the completion of the vessel". If the area is not cleaned to the satisfaction of port management, then any appropriate actions to do so will be billed by ProvPort for all direct and indirect costs upon completion of the action." o Upon completion of cargo operations, dock areas are swept with mechanical broom equipment and/or magnets for ferrous cargoes. Routine sweeping is performed in non-dock areas and checklists managed in SWMP. • WTS generated sweepings are accumulated, characterized, and disposed of by qualified contractor. Analytical reports, beneficial use determination and/or disposal documentation provided in Tab C of Stormwater binder.
Effect	Rapid management of cargo residues from ground reduced handling, transportation, and storage of dry bulk impacts to stormwater.
Conclusion/ Recommendation	• Continue to follow and monitor Tariff and SWMP requirements.
3.2.3 *Take measures to prevent water contamination during loading and unloading operations (e.g., use canvas between ships and docks when unloading).*	
Claimed? ■ Yes ☐ No	

Condition	Met.
Cause	• IMS925 Checklists and Forms Section 3.2.3 has a Pre-Cargo Transfer Checklist to be completed during operations. • Due to the nature of bulk cargoes and limited space between vessel and dock there are few options allowing canvas usage. WTS does modify and maintain cargo unloading gear to ensure limited spillage occurs e.g., welding containment plates on grapple grabs). • Example BMPs employed by WTS during loading and unloading operations include: o Use of qualified operators; o Not dropping from height: o Booms; o Welding of containment plates on grapples; and o Ensuring the correct crane grab attachment is utilized is part of the SOPs. • WTS uses licensed divers to routinely investigate any material loss in or near navigational berth/channel when warranted. When spillage or residue does occur, Tariff 750 Berths requires corrective action and timelines to be met (See Criterion 3.2.2).
Effect	Measures to prevent water contamination during loading and unloading operations reduce impacts to the environment.
Conclusion/ Recommendation	• Continue to follow and monitor Tariff and SWMP requirements.
3.2.4 *For outdoor operations, reduce dust dispersal by one or more of the following: spraying a light mist; using screens, air, or water curtains and/or drapes; reducing conveyor belt height and speed; keeping outdoor dry bulk piles covered or protected by wind shields as much as possible when they are likely to blow away by the wind or to leach out on to the ground.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Section 2.2.8 of the SWMP notes Dust or Particle Generating Process to include bulk cargo piles, vehicles, etc. BMPs are discussed to include booms, curtains or shields, water spray, etc. • SWMP BMPs for dust mitigation include the use of water spray towers, water fogging machine, and/or designated water trucks for dust control. Water is utilized in air spray and also on ground to mitigate migration. • Outdoor dry bulk piles e.g., salt, etc. are noted on the SWMP Figure 2 material storage areas, covered, and protected by impermeable cover/shield. • Terminal Tariff No. 008 requirements related to housekeeping. Part 750 Berths notes "it is the responsibility of the tenant business and/or stevedore company using any berth and dock apron for vessel operations to return the berth to its condition before such work commenced. The areas must be clear and free of any debris, remaining cargo, equipment, or other items associated with the cargo operation within twenty-four (24) hours after the completion of the vessel". If the area is not cleaned to the satisfaction of port management, then any

	appropriate actions to do so will be billed by ProvPort for all direct and indirect costs upon completion of the action."
Effect	Measures to prevent particle/dust contamination via air/water will reduce impacts to the stormwater infrastructure.
Conclusion/ Recommendation	• Continue to follow and monitor Tariff and SWMP requirements.
3.2.5 *Fit storm drains with screens, baskets, geo-textiles or other devices in order to filter suspended solids found in storm water runoff and ensure that such devices are cleaned on a regular basis.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Containment booms in use along berth edge. • Sediment filter fabric in catch basins noted. • See SWMP binder for pictures/purchase orders for routine sweepings management, catch basin cleaning and maintenance, etc.
Effect	Filters BMPs prevent/reduce suspended solid contributions to stormwater infrastructure.
Conclusion/ Recommendation	• Continue to follow and monitor Tariff and SWMP requirements.
3.2.6 *Recover cargo losses under the conveyors.*	
Claimed? ☐ Yes ☐ No ■ NA (Claimed as Not Applicable)	
Condition	Criteria not applicable – conveyors not used over water.
Cause	• Conveyors for cargo of ships loading are not used. • One instance of conveyor use in 2023 loading off-specification product for customer to rail for recycling. Transfer was all land based and not proximal to water.
Effect	Not applicable.
Conclusion/ Recommendation	• Not applicable.
3.2.7 *Regularly wash vehicles in dedicated areas to avoid dust dispersal on and off site.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Vehicle washing is discussed in Section 2.2.7 of the SWMP. • WTS has two designated vehicle/equipment washdown areas noted on Figure 2 SWMP. o Interior wash bay in the Maintenance Shop which allows for the use of biodegradable degreasers. This wash bay is contained, and effluents are collected in an oil-water separator (OWS) with sump; and discharge to City sewer; and o Exterior wash pad on western side of Drainage Area 3 over 100 feet from the waterfront. Washing is completed within containment booms and blocked off area. Wash water does not include chemicals, soaps, detergents, steam, or heated water. The washing process is restricted to the outside of vehicles (i.e., no engines, transmissions, undercarriages, or truck beds) and is not used to remove accumulated industrial materials, paint residues, heavy

	metals or any other potentially hazardous materials from the vehicle surfaces. Signage on appropriate use is visible and posted.
Effect	Vehicle washing reduces dust and suspended solid pollutants on and off the site.
Conclusion/ Recommendation	• Continue to follow and monitor Tariff and SWMP requirements.
Level 2 achieved.	
3.3.1 *Adopt a Water and Land Pollution Prevention Plan.* *Note: A model is provided in Annex 2-A.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See 2.3.2
Effect	Existing plans and operational controls satisfy Annex 2-A Level 3 requirements.
Conclusion/ Recommendation	• Continue to manage and annually review per plan revision requirements (#28) and update Annex 2-A crosswalk. Capture updates in revision logs. • Additional enhancement to the Level 3 plan includes: ○ List and estimated quantity of potential pollutants (e.g., fuel, solvent, oil, paint, etc.) stored and/or used on site (#14). Append inventory to plan and keep at area e.g., building, of use. Only general locations of waste management, material storage, etc. are provided in Figure 2. Material inventory at the point of use is best practice. • Document Pollution Prevention and Preventative Maintenance Program team meetings and summary actions to demonstrate consideration/action (#1)
3.3.2 *Produce an incident report and maintain records for each incident of abnormal dust or discharge accompanied by a detailed analysis of the causes and corrective measures implemented.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• IMS925 Checklists and Forms 3.1 Initial Report/Nonconformity Reporting Flowchart and Form presented for incident documentation, including root cause determination and corrective action. • Incident reports are filed within the company SPCC plan, SWMP plan and operations plan manuals. • Discharges include spills, and/or reports of water sheen within the Providence River (areas surrounding vessels). • Discharges are reported both as part of the SWMP, SPCC and WTS reporting requirements in Operations Manual. SWMP Section 2.4 Significant Leaks and Spills defines spill reporting requirements. • Tariff 008 requires reporting to WTS for tenant activities but is seldom conducted. Tenant awareness opportunity for improvement.
Effect	Incident reporting including root cause determination and corrective action planning ensures incidents are addressed and WTS can learn and improve.

Conclusion/ Recommendation	• Finalize, train, and communicate incident reporting process, to include tracking, reporting and causal analysis; integrate into ISO 14001 EMS Corrective and Preventive Action (CAPA) process. • Use trend and causal analysis to identify opportunities for improvement.
Level 3 achieved. **Level 4 not claimed or justified – STOP.**	

PERFORMANCE INDICATOR 4 – COMMUNITY IMPACTS

Does the participant ensure that it is monitoring regulations?	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Section 6 of IMS915 identifies environmental regulations. • WTS participates in various stakeholder workgroups and advocacy organizations e.g., Propeller Club of Narragansett Bay, USCG community stakeholder meetings, City of Providence local emergency planning committee (LEPC), City of Providence community outreach program via EPA. • WTS also monitors press/media associated with ProvPort and other waterfront issues and posts related information of its' web site. • WTS uses a public relations firm to monitor social media/media communications and support outreach needs.
Effect	Awareness and competence of applicable and emerging regulatory requirements.
Conclusion/ Recommendation	• WTS is involved in a number of federal, state, local, trade/advocacy organization organizations and should continue to monitor its brand reputation, promoting its commitments and environmental performance improvements through Green Marine in the future.
Level 1 achieved.	
External Communications	
Noise	
4.2.1 *Impose speed limits on vehicles in sensitive zones.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Posted street signs are along access roadways leading to all areas in the port. Once on dock designated signage as needed near tenant locations or posted on temporary and fixed locations. • WTS (ProvPort) has posted speed limit of 25 MPH on streets and "safe speeds" throughout facility. Tenant areas may impose further reduced speed limits. • WTS is located in an area not accessible by public transport. Access to the operating site by bike or by foot is not allowed for security reasons; all employees/visitors must be granted access by Security and perimeter is security controlled by Security vendor (Securitas). • Access/egress to ProvPort is controlled through 24/7 manned security gate pursuant to Facility Security Plan. Officer(s) deployed at the gate coordinate traffic flow (as witnessed during the site visit).
Effect	Speed limit signage and communication a control to reduce accidents.
Conclusion/ Recommendation	• Continue to follow FSP, Operations Manual, and monitor controls.
4.2.2 *Adopt operational procedures or take measures limiting the use, or reducing the impact of warning signals, without compromising safety (e.g., use strobe light during nighttime operations, use lynx alarm, adapt the height or direction of the device, adjust the frequency of the signal, etc.)*	
Claimed? ■ Yes ☐ No	

Condition	Met.
Cause	• Due to navigational concerns nighttime lighting is limited to avoid blindness of port docking pilots. Dock lighting while at higher elevations or on top of buildings are aimed down when in use in a particular area. • Security concerns for lighting involve lower light towers and are in limited areas (again downward facing) due to the overall background ambient lighting use of perimeter lighting is reduced.
Effect	Not applicable in 2018 verification.
Conclusion/ Recommendation	Not applicable.
4.2.3 *Take measures to reduce the noise emanating from rail operations at the port (such as rail lubrication, etc.).*	
Claimed? ☐ Yes ☐ No ■ NA (Claimed as Not Applicable)	
Condition	Claimed as Yes but not applicable after discussion.
Cause	• Not applicable in 2018 and 2021 verifications. • Rail operations are privately owned and operated by the Genesee & Wyoming Railroad. The rail only services the port on an as needed basis and 24/7 operations do not occur, limiting exposure. • There is no use of the port facility for storing rail cars or having throughput rail lines connecting other locations limiting overall rail traffic to the terminal.
Effect	Not applicable in 2018 & 2021 verification.
Conclusion/ Recommendation	• Agree not applicable as criterion not within WTS control.
4.2.4 *Limit idling of vehicle, equipment, and locomotives.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See Performance Indicator criteria 1.2.1 and 1.2.3. • Section 4.3 of IMS915 includes an anti-idling policy. The policy is applicable to all vehicles and equipment, regardless of location and operations. Specific idling policy directives include: o *Road Vehicle Idling*: All roadgoing vehicles shall observe a 15-minute idling limit, regardless of operation. Once 15 minutes of idling has been reached, the vehicle's engine shall be deenergized. o *Off-Road Vehicle Idling*. All non-road vehicles and equipment, such as wheel loaders, excavators, non-road dump trucks, etc., shall observe a 60-minute idling limit. Once 60 minutes of idling has been reached, the vehicle or equipment's engine shall be deenergized. • Railroad operations not applicable; beyond WTS control. • Equipment idling – area for improvement.
Effect	Reduced GHG and air pollutant emissions.
Conclusion/ Recommendation	• Monitor and enforce policies and guidance. • Expand to tenants where feasible.
4.2.5	

Have a documented process (e.g., purchase policy) for selecting less noisy equipment when buying new equipment.	
Claimed? ☐ Yes ■ No	
Condition	Not claimed or justified.
Cause	• No documented process or purchasing policy.
Effect	Purchase policy for environmentally preferred products.
Conclusion/ Recommendation	• Equipment purchases are often limited in options driven by cost and specification requirements. WTS should explore, wherever possible purchasing products with lower emissions, better fuel efficiency, and noise as considerations (met in part through DERA grant pursuits).
Dust	
4.2.6 *Adopt measures to hold back dust on roads (e.g., watering of roads, wet brushing, paving, maintenance of pavement, etc.).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• IMS915 A1 Dust Mitigation SOP. • Vehicle fleet includes designated water truck and mechanical sweeping attachments. WTS also utilizes vendor services for street and common area sweeping. Common areas e.g., roadways and dock apron are routinely wetted by mobile water tanker when applicable. • BMPs in-place within WTS Operations Manual, SWMP and Green Marine binder which contains reference invoices for vendors utilized. • Section 2.2.8 of SWMP discusses dust or particle generating processes noting sweeping program requirements. Sweepings are managed through soil broker, Brighter Horizons, who samples, characterizes, and manages disposal of materials at an appropriate facility. • Tariff 008 requires common roads to be maintained by tenants with prescribed timelines and penalties.
Effect	Dust and reduction contribute to reduced impacts to stormwater.
Conclusion/ Recommendation	• Measures in place appear to be sufficient when SWMP BMPs are followed. • Roadway housekeeping may be required based on on-going tenant and construction activities. • Tariff language reinforces construction projects impacting common roadways on site.
4.2.7 *Apply measures to improve the management of bulk cargo storage (e.g., covering cargo that is stored in piles, reducing the height of such piles, moving piles to areas that are less exposed to wind, containment walls, etc.).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Bulk cargo locations noted on SWMP Figure 2 – Drainage Plan. Piles are located in designated containment areas. • WTS utilizes a combination of inside storage locations (WA Mills/Heidelberg Materials, St. Mary's cement), • Outside storage piles are routinely tarped to avoid runoff and/or the use of containment sediment booms around base of piles.

	• BMP's include shaping pile heights for compaction and/or wetting of the pile. Exterior stockpiles are usually of short duration for salt, aluminum oxide, copper slag, etc. • Majority of tenant operations now break bulk associated with wind power industry.
Effect	Management of bulk cargo storage reduces impacts to stormwater infrastructure and receptors.
Conclusion/ Recommendation	• Continue to monitor and sustain bulk piles in accordance with SWMP and Port Tariff best practices.
Housekeeping	
4.2.8 *Take measures to avoid garbage and recycling dispersion by wind and wildlife (ex. covers, fencing) and to reduce odours.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• IMS915 A8 Litter Management SOP. • IMS915 A7 Recycling SOP. • WTS uses Republic Services for solid waste and recycling management at Port. • Exterior recycling dumpsters are covered by lids. • Port debris dumpsters are either covered by lid or roll off containers are required not to be overfilled. • Active storm preparation or heavy winds SOP requires all dumpsters to be checked to ensure wind born debris is kept to a minimum.
Effect	Solid waste segregation and collection reduces litter.
Conclusion/ Recommendation	• Waste receptables, materials recycling e.g., scrap, etc. and other recycling in appropriate locations.
Traffic/Congestion	
4.2.9 *Implement measures to manage traffic (e.g., bus, truck, railway) in and out of the property to avoid local congestion (e.g., signboard, traffic coordinator or checker).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See criterion 1.2.3. • By product of a secured port is that all traffic entry is controlled at one main entry location. Traffic and vehicle entry is controlled, and procedures include adding a secondary traffic lane if frequency increases. • Staff set up traffic lanes around cargo truck loading/unloading areas as needed. • Roadways are not throughput for the general public reducing the volume of vehicles entering the port. • Interior traffic flow with abundant and visible posted signage. • WTS is in an area not accessible by public transportation at the terminus of Terminal Road. Access to the operating site by bike or on foot is not allowed for security reasons. Rail access is controlled by Genesee & Wyoming Railroad.
Effect	Avoid or mitigate local congestion.

Conclusion/ Recommendation	• All site access controlled through main security gate.
Light	
4.2.10 *Direct lights so they only illuminate the necessary zone.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Unless there is a higher port security threat level, non-essential or non-active zone lighting is off. Nighttime lighting is downward facing and most on photocells for dusk-to-dawn if essential. • Cargo handling lights for dock areas are kept off during down times and only minimal security perimeter lighting is used during evening hours. Where applicable perimeter lighting is all down facing reducing the impacts especially for navigation in the nearby waterway. • Berth lighting faces downward, any light towers needed are only illuminated during cargo operations and turned off when not in use as BMP.
Effect	Reduction of light pollution.
Conclusion/ Recommendation	• Continue with SOP/BMPs.
4.2.11 *Switch off bothersome lighting at a specific time if there are no operations underway.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See criterion 4.2.10. • Facility does not abut residential areas. Dock lighting faces downward and any light towers needed on waterfront are only illuminated during cargo operations and turned off when not in use as BMP. • Nighttime lighting is switched off unless needed for cargo operations or security. Individual dock zones enable limited areas to be lit as needed. Security lighting is minimal unless additional lighting is needed for heighted security threat level. • Security lighting on photocells enabling them to be off during daytime hours.
Effect	Energy conservation through demand-based management and efficient lighting.
Conclusion/ Recommendation	• Interior lights in WTS building are manual switch off; use of automated timer an opportunity area. • Noted exterior light pole change out to LED lighting as energy conservation commendable.
Level 2 achieved. 9 of 10 criteria met. (90%) or 100% of applicable criteria. 4.2.5 not met. **Criterion 4.2.3 not applicable (Claimed as met but historically NA) as WTS does not control rail operations.** **Level 3 not claimed and no justification provided – STOP.**	

PERFORMANCE INDICATOR 5 – ENVIRONMENTAL LEADERSHIP

5.1.1 *Reach Level 2 for at least 1 other performance indicator of the program.*	
WTS has reached level 2 for 6 of the 7 performance indicators in this verification.	
Level 1 achieved.	
5.2.1 *Reach Level 2 for at least 2 other performance indicators of the program.*	
WTS has reached level 2 for 6 of the 7 performance indicators in this verification.	
AND fulfill one of the following 2 criteria:	
5.2.2 *Write and publicly communicate an environmental policy.*	
Claimed? ■ Yes ☐ No	
Condition	Not met.
Cause	• WTS has implemented an Environmental Protection Policy in support of its ESG commitments and ISO certification process, but it has not been publicly communicated. • The policy is dated May 2023 and signed by the designated person ashore.
Effect	A publicly communicated environmental policy.
Conclusion/ Recommendation	• WTS has taken the step to develop an ISO 14001 EMS and created an environmental policy. Publish the environmental policy statement on the WTS web site – continual improvement.
Or	
5.2.3 *Develop and update annually a section on the participant's public website presenting an overview of the Green Marine program and the participant's latest performance results.* *Note: Green Marine offers assistance to participants in developing the content.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• https://www.provport.com/waterson/environmental.html • WTS web site includes "Environmental" page with overview and Green Marine information with links to each. "Latest News" contains articles about partnership with new offshore wind energy partners e.g., WIND, Orsted, etc. and business along with environmental successes. • 2022 Green Marine Performance Report link is posted as well as links to the 2019 and 2022 Green Marine verification reports completed by EA Engineering, Science, and Technology, Inc., PBC. A press release regarding the 2019 baseline Green Marine Verification Summary Report was noted in the Latest News page. https://www.provport.com/pdf/GM_PR_2018_results-FINAL.pdf • The "More information about Green Marine" links directly to the Green Marine home page.
Effect	Promotion of Green Marine program and continual improvement.
Conclusion/ Recommendation	• Continue to use web site to publicly communicate its journey, commitment to Green Marine, and demonstrated leadership to its community stakeholders.
Level 2 achieved.	

5.3.1 *At least 2 of the participants' eligible terminals or operating sites (stevedoring companies) or shipyards are Green Marine participants.* ***Notes*** *Not applicable if the company operates only one eligible terminal or site.*	
Claimed? ☐ Yes ☐ No ■ Not Applicable	
Condition	Not applicable per note.
Cause	• WTS at ProvPort is the only location where WTS is terminal operator. • WTS as terminal manager and operator does not have the authority to enforce voluntary compliance with this environmental program. • It can however assure that each terminal tenant is in compliance with city, state and federal regulatory requirements.
Effect	Expansion of Green Marine program and continual improvement.
Conclusion/ Recommendation	• Expand Green Marine participation as feasible in the future.
5.3.2 *Undergo an internal or external audit at least every 5 years to verify the environmental compliance of all operations.* ***Notes*** *Any non-compliances found should be rectified, when possible, within the following year. Otherwise, an action plan with a timeline should be developed.*	
Claimed? ■ Yes ☐ No	
Condition	Not met.
Cause	• WTS a hierarchy of inspections and reviews as noted in prior sections related to permit-compliance but has not completed an internal or external audit within the last 5 years to verify compliance of all operations. • Per ISO EMS, WTS does have an annual environmental regulations applicability review performed by third-party to develop its regulations register, but this is not an audit of environmental compliance.
Effect	Audits are a best practice for risk management.
Conclusion/ Recommendation	• Evaluate options to meet this requirement.
Level 3 not met – 5.3.2 not met – STOP.	

PERFORMANCE INDICATOR 6 – WASTE MANAGEMENT

Does the participant ensure that it is monitoring regulations?	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS utilizes the following sources to monitor regulations: o Websites e.g., Rhode Island Department of Environmental Management (RIDEM), RI Coastal Resources Management Council (RICRMC), U.S. Environmental Protection Agency (EPA), etc. o Regulatory agencies contracts e.g., EPA Ports Initiative, RIDEM e.g., Office of Air Resources, Office of Site Remediation, etc. o Trade journals and magazines. o Consultants e.g., Wilcox & Barton, GZA, KLR, etc. o Advocacy organizations e.g., American Association of Port Authorities (AAPA), Propeller Club Port of Narragansett Bay, North Atlantic Ports Association (NAPA), Northeast Diesel Collaborative (NEDC) Ports & Goods Movement Workgroup. o NGOs e.g., Save The Bay. o Institutional e.g., URI, Bryant University. o ProvPort Board of Directors.
Effect	Awareness and competence of applicable and emerging regulatory requirements.
Conclusion/ Recommendation	Continue methods and approaches noted above.
Level 1 achieved.	
Implementation of the majority of the applicable criteria	
6.2.1 *Equip offices, workspaces, and facilities with recycling bins, including for used batteries, cartridges and fluorescent light bulbs and make sure they are strategically located and appropriately labeled.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS has an in-place and sustained recycling program across operations. All company buildings have designated recycling bins and labelled trash receptacles. • Material recycling occurs through informal processes. WTS has partnered with Republic Services for input on solid waste. Recycling noted occurs in both operational and non-operational areas: o Office operations ▪ Paper ▪ Aluminum cans/plastic bottles ▪ Light tubes (managed by external vendor) ▪ Batteries (see photo) ▪ Copier toner (take back program) o Operational ▪ Scrap metal ▪ Parts washer solvent (vendor) ▪ Batteries (vendor) ▪ Plastic/bottles and cans ▪ Paper

	▪ Wood pallets (vendor) ▪ Used oil (vendor) • WTS administrative office has bottled water service to offset purchase of plastic water bottles.
Effect	Increase waste diversion and reduce waste at source.
Conclusion/ Recommendation	• In 2019, Administrative office/shop kitchen previously did not have formal paper recycling bins, battery, or light storage – now kitchen in administrative offices provides plastic/aluminum can recycling – continual improvement. • Continue recycling program in administrative office and Maintenance Shop for paper, office products, batteries, and light tubes. • Work with Republic Services to refine waste inventory per Annex.
6.2.2 *Install clear signage for waste disposal on port or terminal property.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Clear signage for waste disposal noted across operations as WTS and tenants are individually responsible for waste management and disposal associated with their operations and activities. • Signage noted "don't litter". • WTS uses Republic Services for solid waste management at Port.
Effect	Clear signage supports awareness and communication of waste management.
Conclusion/ Recommendation	Continue methods and approaches noted above.
6.2.3 *Provide training and/or educate staff on established garbage management procedures and hierarchy (Reduce, Reuse, Recycle, Valorize – as in to add value), including on procedures for handling and disposing of hazardous waste.*	
Claimed? ■ Yes ☐ No	
Condition	Not met.
Cause	• WTS generates various wastes e.g., solid, hazardous, universal wastes, as well as products which are recycled by others. Observed wastes in the form of paper and trash, spent solvent from parts washer, aerosol cans and waste oil/POL in shop, general knowledge/documentation of EPA generator status, waste streams and management was demonstrated. • No evidence of formal training on valorization/waste management procedures or pollution prevention were provided. Training related to waste is currently provided through the annual Safety program training but is HAZCOM-focused versus regulatory e.g., RCRA waste management. • Staff who manage waste in Maintenance Shop were knowledgeable in management practices for materials such as aerosol can puncturing, used oil recovery and management, parts washer solvent, oil filters, solid waste, hazardous waste, and who to call if action needed; knowledge was based on their operational years of experience and not routine training, or prior employment.

	• Hazardous/special waste is managed through use of qualified/licensed waste disposal vendor e.g., Safety-Kleen, Clean Harbors, but no formal inventory or handling and disposal procedure has been developed. • A new SOP under IMS915 A7 Recycling was added. As part of WTS company general training program, ensures all staff are aware of our recycling policies – noted area of continual improvement. • Importance of training is emphasized through Terminal Tarriff compliance. Tariff No. 008, Part 940 Hazardous Materials notes "prior arrangements must be made for the handling of hazardous cargo. All hazardous materials must be properly documented, labeled and packaged according to applicable government regulations. ProvPort and the Terminal Manager reserve the right to refuse to handle and may require the removal from the facility any hazardous materials not meeting these requirements." WTS staff must have the appropriate training to support conformance with this tariff.
Effect	Controls to manage waste diversion and disposal in compliance with regulatory requirements.
Conclusion/ Recommendation	• Expand Section 5 of IMS915 5.3 Pollution Risk and Prevention Pan Annual Course and existing Safety training to include waste management module focusing on RIDEM/EPA requirements such as waste generator status, handling and management, disposal and recordkeeping and valorization. This can also be developed through tool-talks or similar communication channels. • WTS can take advantage of pollution prevention case studies through RIDEM Office of Pollution Prevention http://www.dem.ri.gov/programs/customertech/pollution-prevention.php
6.2.4 *Encourage the use of 1) reusable, 2) recyclable and 3) compostable supplies (e.g., reusable dishes, etc.).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See 6.2.1 above, WTS has implemented a recycling and reuse program across operations as previously reported. operational uses include recycling of used oil, batteries, scrap metal, parts washer solvent, antifreeze, tires, wooden pallets, metal drums and containers. • Recycling occurs through informal processes and is encouraged but not centrally managed or evaluated. • WTS kitchen has recycling of batteries, plastic bottles, aluminum cans, water dispenser, and reusable kitchenware e.g., dishes, mugs, etc. • Office paper recycled paper content. • Consideration and use of environmentally preferred products in operations noted - Simple Green environmentally friendly, non-toxic, and biodegradable cleaner used in Shop operations.
Effect	Use of environmentally preferred products reduces landfill waste.
Conclusion/ Recommendation	• RIDEM's Office of Customer and Technical Assistance's Pollution Prevention Program offers guidance; the program provides non-regulatory business assistance and offers free technical assistance. http://www.dem.ri.gov/programs/customertech/pollution-prevention.php
6.2.5	

Encourage staff to adopt sustainable paper use practices (e.g., reduce overall printing and copy paper consumption, double-sided printing, reuse and recycle paper, etc.).	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Office network printer default set to double-sided print and paper recycling stations set up in administrative space. • Office paper verified to be SFI/FSC-certified and ensures that products come from responsibly managed forests that provide environmental, social, and economic benefits. • WTS works with a solid waste vendor, Republic Services, for input and guidance on improvements. • Single stream closed dumpster outside WTS office building solely focused for paper and cardboard.
Effect	Paper recycling as means to increase waste diversion.
Conclusion/ Recommendation	• Continue methods and approaches noted.
6.2.6 *Promote and encourage users, contractors, and/or clients to minimize waste and to recycle.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS claims no verifiable evidence other than requests, however the following were noted as methods to promote and encourage: o Web site promotion of Green Marine program demonstrates encouragement to stakeholders on waste minimization; o Use of qualified waste disposal contractors for collection of used oil and other materials for recycling/reuse; and o Visible recycling program in workspaces and signage. • Tenant and customer operations are responsible for management of their own operations. • As leaseholder for tenant operations, WTS lease agreements require tenants to meet applicable local, state, and federal laws and regulations, but going beyond this is not required at this time.
Effect	Active promotion to stakeholders encourages waste minimization and reduction.
Conclusion/ Recommendation	• Modify IMS915 Environmental Management System Policy to include commitment to waste minimization and recycling as part of community/environmental leadership performance indicators.
6.2.7 *Gather information from the local service provider/waste hauler in order to have a better understanding of the relative costs and the environmental benefits related to the disposal of waste, recycling, and organics.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS engages with numerous service providers/waste haulers to obtain information on recycling and disposal of wastes. Vendors include; Safety-Kleen, Brighter Horizons, Western Oil, Clean Harbors. • Republic Services provides solid waste management for the port.

Effect	Promotes awareness on waste management technologies from the value chain.
Conclusion/ Recommendation	• Document dialogue and consider technologies/alternatives in Pollution Prevention team discussions.
6.2.8 *Eliminate or limit the use of plastic straws, plastic bottles, single-use coffee cups, and any other similar items in administrative office.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• See criterion 6.2.4. • WTS kitchen has plastic/aluminum recycling, water dispenser to discourage plastic bottle use, and reusable kitchenware e.g., dishes, coffee mugs, etc. – no single-use Styrofoam or straws noted.
Effect	Promotes plastics reduction in marine environments e.g., Operation Clean Sweep.
Conclusion/ Recommendation	• Continue commitment noted.
6.2.9 *Place marked garbage and recycling containers at convenient locations on site (e.g., for employees and visitors).*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Exterior solid waste dumpsters were available for company building locations and general berth areas. Containers are market for proper disposal. • Purchase orders for trash pick-up in binders reviewed.
Effect	Convenient garbage and recycling containers.
Conclusion/ Recommendation	• The containers observed were sufficient and managed appropriately. Continue to work with Republic Services.
Dry Bulk Terminals (2.9, 2.10, 2.11)	
6.2.10 *Adopt procedures to minimize the amount of cargo residues left on board the ships.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Written procedure is established by Tariff No. 008 where WTS typically machine cleans holds. Cargo cleaning is arranged prior to vessel cargo operations. Broom cleaning is sometimes applicable but usually vessel crews support clean-out operations. Sweepings are managed appropriately. • Exterior solid waste dumpsters are available for company building locations and one is for general dock use. • WTS uses stevedore BMPs noted in Green Marine playbook. • Vessel wastes are regulated by MARPOL and USCBP/USCG. Notices are provided to all parties by Tariff. Vessel dumpsters are arranged by vessel agents and approved by WTS staff. Vendors are required to possess certificates of insurance and spill plans.

	• Cargo designated dumpsters are coordinated as required, managed and removal by tenant agent vendor or WTS.
Effect	Cargo residue reduction reduces cross-contamination and housekeeping.
Conclusion/ Recommendation	• Cargo offload operations are governed by tenant contract, tariff and written BMPs.
6.2.11 *Facilitate the discharge of solid bulk cargo residues ashore, including hold sweepings.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• For cargo operations where WTS provides service, BMPs are in place to reduce residues and cargo loss. Most vessel operations utilize machine cleaning of vessel cargo holds and in some cases labor is used to broom clean vessel holds. Occasional vessels will hire third party companies to wash vessel holds. • Solid bulk cargo managed by WTS includes salt, asphalt, cement, aluminum oxide, and project cargoes (see SWMP – Appendix C). Primary exports are scrap metals, automobiles and project equipment and materials. • Facilitation of discharge is demonstrated by written procedure Tariff No. 008 where WTS typically machine cleans holds. Cargo cleaning is arranged prior to vessel cargo operations. • WTS uses stevedore BMPs noted in Green Marine playbook. • Vessel wastes are regulated by MARPOL and USCBP/USCG. Notices are provided to all parties by Tariff. Vessel dumpsters are arranged by vessel agents and approved by WTS staff. Vendors are required to possess certificates of insurance and spill plans. • Residues/sweepings are disposed of through a remediation broker to licensed receiving facility after sampling. Chain of custody and disposal slips kept in the SWMP manual. • Cargo designated dumpsters are coordinated as required, managed and removal by tenant agent vendor or WTS.
Effect	Proper discharge of cargo residues so as not to impact land or water.
Conclusion/ Recommendation	• Cargo offload operations are governed by contract, tariff and written BMPs.
6.2.12 *Recover as much as possible off specification products (i.e., products captured in storm water sumps and effluent treatment works) or reintroduce them into the handling process.* ***Notes*** *Not applicable in terminals that handle multiple dry bulk products because of cross contamination risks.*	
Claimed? ■ Yes ☐ No ■ Not Applicable	
Condition	Not applicable per note above.
Cause	• WTC handles multiple dry bulk products as noted in 6.2.11.
Effect	Not applicable
Conclusion/ Recommendation	• Not applicable.
Level 2 achieved. 10 of 11 applicable criteria met (91%). Criterion 6.2.3 not met and 6.2.12 not applicable.	

Level 3 not met. Criterion 6.3.1 not met – STOP.

PERFORMANCE INDICATOR 7 – COMMUNITY RELATIONS

Does the participant ensure that it is monitoring regulations?	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS utilizes the following sources to monitor regulations: o Websites e.g., Rhode Island Department of Environmental Management (RIDEM), RI Coastal Resources Management Council (RICRMC), U.S. Environmental Protection Agency (EPA), etc. o Regulatory agencies contracts e.g., EPA Ports Initiative, RIDEM e.g., Office of Air Resources, Office of Site Remediation, etc. o Trade journals and magazines. o Consultants e.g., Wilcox & Barton, GZA, KLR, etc. o Advocacy organizations e.g., American Association of Port Authorities (AAPA), Propeller Club Port of Narragansett Bay, North Atlantic Ports Association (NAPA), Northeast Diesel Collaborative (NEDC) Ports & Goods Movement Workgroup. o NGOs e.g., Save The Bay. o Institutional e.g., URI, Bryant University. o ProvPort Board of Directors.
Effect	Awareness and competence of applicable and emerging regulatory requirements.
Conclusion/ Recommendation	Continue methods and approaches noted above.
Level 1 achieved.	
7.2.1 *Make available/post a telephone number of, or redirect calls to, the authority in charge of receiving inquiries and concerns (including complaints) related to the participant's activities.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS has redesigned the website to include a more robust "Contact" page with contact information, inquiry and comment page where interested parties can submit notifications that go to company email. https://www.provport.com/waterson/contact.html • Names, titles and phone numbers are provided. General phone, fax and address with map is provided on the web site. • A "Message Us Below" form is available and can be filled out and submitted for inquiries.
Effect	Methods and process to address inquiries from stakeholders.
Conclusion/ Recommendation	• Add social media links to contacts .
7.2.2 *Develop and implement a documented procedure to keep track of and respond to inquiries and concerns (including complaints). As appropriate, dedicate a person to respond and/or be dispatched to the site in a timely fashion, implement and monitor corrective measures and readjust as needed.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• Not a documented procedure, but a process sustained.

	• Website direct emails to designated company personnel based on inquiry or comment. Inquiries and concerns about general port activities are directly sent to the Facility Manager, while business or cargo inquiries are directly emailed to the Director of Operations, VP of Business development. Issues are discussed in routine meetings for action. • Concerns are communicated principally through email. New ISO EMS will enhance the process. • Complaints can arise from multiple sources including telephone, email, social media, etc. Complaints are infrequent, but WTS is often contacted by the public when issues arise resulting from other agencies/organizations that are perceived to be under WTS control. Emails from stakeholders regarding security, smell/odor from tanks, dust complaints, etc. • IMS925 Checklists and Forms 3.1 Initial Report/Nonconformity Reporting Flowchart and Form is used for incident documentation, including root cause determination and corrective action.
Effect	Methods and process to address complaints from stakeholders on PAC operations.
Conclusion/ Recommendation	• Develop a log noting date, stakeholder, issues, responsible party, mitigation or action and date of closure.
7.2.3 *Identify, locate, and update the participant's network of local stakeholders (e.g., employees, tenants, residents, Indigenous Peoples, NGOs, municipalities/towns, governmental and environmental organizations, suppliers).*	
Claimed? ■ Yes ☐ No	
Condition	Not met.
Cause	• WTC is just launching a long-term Master Planning process for ProvPort. The contract was just awarded to a consultant (GZA) and an effort is underway. One of the initial tasks of effort will require a stakeholder identification, analysis and engagement strategy which will form the basis for this process. • WTS participates in numerous community stakeholder groups and works with Federal, State, and local regulatory agencies as part of day-to-day port operations. • City community outreach group relationships were developed in-part through the US EPA's regional office and are routinely hosted by the City of Providence involving all members of the community and business stakeholders. WTS's President routinely attends these meetings. • WTS also routinely coordinates with the Rhode Island Commerce Corporation, City of Providence's Public Redevelopment Agency, City's legislative body (House/Senate) and Federal partners, USCG, DHS, US DOT, State partners, RI DEM, CRMC and coordinates with universities, Bryant, URI as examples.
Effect	Active stakeholder identification and management of network.
Conclusion/ Recommendation	• Follow master planning noted above to develop initial process.
7.2.4	

Regularly monitor media posts about the participant's activities.	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS employs a public relations (True North Communications) firm for public and government relations services to promote and advocate for port activities. Consultant scope of services was reviewed, and support includes strategic messaging, draft and distribute press releases, interview preparation, facilitate forums, arrange interviews, and track media channels on port. The consultant is a registered lobbyist and provides government relations support as well. • WTS staff also monitor stakeholder communications through daily activities and channels. • When response is required, comments are escalated and assigned for action as discussed in 7.2.1.
Effect	Real-time monitoring and evaluation of stakeholder feedback.
Conclusion/ Recommendation	• Continue methods and approach in use.
7.2.5 *Communicate information about the participant's activities and operations using at least two communication means. For example: Social Media e.g., Facebook, Instagram, TikTok; LinkedIn; TV; YouTube; Radio or podcast; Webpage with community related content; Local newspapers; Newsletter; or Magazine.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS uses an outside PR firm and internal staff to monitor many of the communication channels noted above. WTS has established a LinkedIn account managed by the VP of Business Development, YouTube account, webpage with community related content (news, environmental) • Media is typically outside WTS's control e.g., TV, Radio or Podcast and Local newspaper.
Effect	Use of multiple communication tools as part of overall strategy.
Conclusion/ Recommendation	• Continue methods and approach in use.
7.2.6 *Incorporate in the applicable policies or value statement of the company the commitment of senior management to maintain and improve the quality of community relations.*	
Claimed? ■ Yes ☐ No	
Condition	Met.
Cause	• WTS web site and specifically the Letter from the President included on the company website, communicate WTS value statement on community.
Effect	Commitment by senior leadership to continually improve quality of community relations.
Conclusion/ Recommendation	• Continue to incorporate policies and value statements in various communication channels.
Level 2 not met. Criterion 7.2.3 not met – STOP.	

5. CONCLUSION/SUMMARY

EA Engineering, Science and Technology, Inc., PBC (EA) was retained by Waterson Terminal Services (hereafter WTS) to conduct a Green Marine Verification in April 2024. The purpose of the verification was to document WTS's self-claimed levels of Green Marine environmental program progress on its 2023 self-evaluation. The period of review was calendar year 2022-2023. The verification was performed by Mr. Brian Lesinski with the active participation of WTS employees.

The review consisted of:

- Physical review of the facility;
- Interviews with various WTS employees;
- Observation of employee work practices;
- Review of documented plans, procedures, programs, and training;
- Examination of select facility records and documents; and
- Auditor's professional judgement of management practices.

The review was conducted in conformance with published Green Marine protocols and checklists, and information provided specifically:

- Self-Evaluation Guide and Summary
- Green Marine Smart Guide – Terminals

WTS has sufficiently implemented systems and processes to support the applicable performance levels verified. The summary of claimed and verified levels is summarized below:

Green Marine Verification Summary 2023 – Waterson Terminal Services, LLC

Environmental Performance Indicator	Level Claimed	Level Verified	Comments
8) Greenhouse Gases and Air Pollutants	3	3	Level 3 verified. Level 1 met. Level 2 met. Level 3 met. Level 4 not met – 1.4.1 not met – STOP.
9) Spill Prevention and Stormwater Management	3	4	Level 4 verified. Level 1 met. Level 2 met. 8 of 8 criteria met (100%). Level 3 met. Level 4 met. Level 5 not claimed or justified – STOP.
10) Dry Bulk Handling and Storage	3	3	Level 3 verified. Level 1 met. Level 2 met. Level 3 met. 3.2.6 not applicable. Level 4 not claimed or justified – STOP.
11) Community Impacts	2	2	Level 2 verified. Level 2 met. 9 of 10 criteria met. (90%) or 100% of applicable criteria. 4.2.5 not met. Level 3 not claimed or justified – STOP.

			verified as claimed. 11 of 15 criteria met (73%). Criterion 4.2.7 should be applicable (not NA as claimed). Level 3 not claimed and not justification provided.
12) Environmental Leadership	3	2	Level 2 verified. Level 1 met. Level 2 met. Level 3 not met. 5.3.2 not met – STOP.
13) Waste Management	2	2	Level 2 verified. Level 1 met. Level 2 met. 10 of 11 applicable criteria met (91%). Criterion 6.2.3 not met and 6.2.12 not applicable. Level 3 not met. 6.3.1 not met – STOP.
14) Community Relations	2	1	Level 1 verified. Level 1 met. Level 2 not met. 7.2.3 not met – STOP.

WTS joined Green Marine in 2018 and completed its initial verification in 2019 and continues to build and improve upon its environmental program performance. WTS improved scores in three performance indicators e.g., 1, 2, and 3. Two performance indicator levels were reduced from levels claimed for indicators 5 and 7. Commendables noted during the verification include:

- WTS leadership's interest, enthusiasm, and commitment to position WTS as an environmental steward in the stevedore community on the east coast.
- Obtaining ISO 14001:2015, 45001:2018 and 9001:2015 certifications with supporting manuals and standard operating procedures.
- Initiation of a 30-year master planning effort with consultant.
- Initial efforts to develop an Environmental, Social, Governance (ESG) report.
- Communicating prior Green Marine performance reports with stakeholders through WTS's website and promoting Green Marine involvement.
- Organization of supporting documentation including management plans and Green Marine "playbook" organized by performance indicator provided efficient review of requirements.
- WTS leadership involvement in local maritime and offshore wind power advocacy organizations including the City of Providence, RI Commerce Corporation, Near Port Community and Providence Resilience Partnership through financial and voluntary commitments for port infrastructure and neighborhood improvements.
- Transparency with public stakeholders through web site content e.g., contact and phone numbers, inquiry form, social media channels, etc.
- Terminal expansion and strategic infrastructure improvements to further position o in the wind power industry on the eastern seaboard (Orsted partnership).
- Decarbonization strategies include Fleet Electrification Assessment, secured EPA Diesel Emission Reduction Act (DERA) funding for vehicle replacements.
- On-going work with Direct Energy as part of tenant value chain to purchase Renewable Energy Credits and agreement with RI Energy/NRG for purchase of 100% green energy.
- Partnership with City of Providence, environmental regulatory agencies, and Save The Bay (NGO) concerning the restoration of an adjacent brownfield and integration into an Urban Coastal Greenway.

Recommendations from this verification review include:

- Continue to share the results of this verification report with stakeholders through WTS's website and actively develop actions plans.
- Develop strategy to meet environmental compliance audit criteria 5.3.2. The baseline environmental compliance audit of WTS operations will serve as baseline for continual improvement and support elevated levels of Green Marine Performance Indicator 5 – Environmental Leadership requirements.
- Coordinate with Republic Services for monthly waste inventory; identify all waste streams and material recycling/reuse efforts to define landfill diversion percentage and opportunities for improvement.
- Modify IMS915 Environmental Management System Policy to include commitment to waste minimization and recycling as part of community/environmental leadership performance indicators.
- Expand Section 5 of IMS915 5.3 Pollution Risk and Prevention Pan Annual Course and existing Safety training to include waste management module focusing on RIDEM/EPA requirements such as waste generator status, handling and management, disposal and recordkeeping and valorization. This can also be developed through tool-talks or similar communication channels.
- Finalize incident identification and reporting procedure, train, and communicate with staff to support complaint and environmental reporting requirements and develop log for tracking.
- Consider modification to model lease contract clauses to promote tenant commitment to Green Marine where feasible.

February 6, 2024

Green Marine Verifier Accreditation

To whom it may concern,

Green Marine Management Corporation hereby certifies that Brian Lesinski is an accredited Green Marine verifier for the year 2024.

Mr. Lesinski participated in training delivered by Green Marine and successfully passed the final evaluation which included a written exam. The accreditation certifies that Mr. Lesinski has the knowledge and the skills to conduct Green Marine verifications according to the organization's standards.

As a Green Marine accredited verifier Mr. Lesinski has the right to offer his services to participants of the Green Marine program to proceed to the external verification of their results every two years, as required by Green Marine.

Mr. Lesinski agrees to provide his services according to the mandate established by Green Marine such as outlined in the *Terms of Reference for Green Marine Verifiers*.

This accreditation letter is valid for 2024 only, but is subject to renewal after participation in an annual update training and payment of an annual membership fee.

Green Marine keeps the right to withdraw or suspend the accreditation of any verifier.

For additional information about our accreditation process and/or our list of accredited verifiers, please contact the Green Marine Secretariat at (418) 261-3161.

David Bolduc

Executive Director, Green Marine