

PRETREATMENT PERMIT

issued to

Goodrich Corporation
100 Wooster Heights Road
Danbury, CT 06810

Location Address:

100 Wooster Heights Road
Danbury, CT

Permit ID: SP0000006

Permit Expires: June 28, 2016

SECTION 1: GENERAL PROVISIONS

- (A) This permit modification is issued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403 (Title 40 of the Code of Federal Regulations, Part 403).
- (B) Goodrich Corporation, ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

- (a) Definitions
- (b) General
- (c) Inspection and Entry
- (d) Effect of a Permit
- (e) Duty
- (f) Proper Operation and Maintenance
- (g) Sludge Disposal
- (h) Duty to Mitigate
- (i) Facility Modifications; Notification
- (j) Monitoring, Records and Reporting Requirements
- (k) Bypass
- (l) Conditions Applicable to POTWs
- (m) Effluent Limitation Violations (Upsets)
- (n) Enforcement
- (o) Resource Conservation
- (p) Spill Prevention and Control
- (q) Instrumentation, Alarms, Flow Recorders
- (r) Equalization

Section 22a-430-4 Procedures and Criteria

- (a) Duty to Apply
- (b) Duty to Reapply
- (c) Application Requirements
- (d) Preliminary Review
- (e) Tentative Determination
- (f) Draft Permits, Fact Sheets
- (g) Public Notice, Notice of Hearing

- (h) Public Comments
- (i) Final Determination
- (j) Public Hearings
- (k) Submission of Plans and Specifications. Approval.
- (l) Establishing Effluent Limitations and Conditions
- (m) Case by Case Determinations
- (n) Permit issuance or renewal
- (o) Permit Transfer
- (p) Permit revocation, denial or modification
- (q) Variances
- (r) Secondary Treatment Requirements
- (s) Treatment Requirements for Metals and Cyanide
- (t) Discharges to POTWs - Prohibitions

- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars (\$25,000) may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above the following definitions shall apply to this permit:

"----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

"Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l). Otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

"Daily Quantity" means the quantity of waste generated during an operating day.

"gpd" means gallons per day.

"Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l). Otherwise, it means the maximum allowable "Daily Quantity", as defined above, unless it is expressed as a flow quantity. If expressed as a flow quantity, it means "Maximum

Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"mg/l" means milligrams per liter.

"NA" as a Monitoring Table abbreviation means "not applicable".

"NR" as a Monitoring Table abbreviation means "not required".

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of March, June, September and December.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum of all values recorded as a result of analyzing each grab sample of; 1) a Composite Sample, or 2) a Grab Sample Average. For those permittees with continuous monitoring and recording pH meters, Range During Sampling shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"Range During Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Semi-Annually" in the context of a sampling frequency, means the sample must be collected in the months of June and December.

"S.U." means Standard Units.

"Total Toxic Organics" means the sum of the concentrations for each of the following toxic organic compounds which is found in the discharge at a concentration greater than ten (10) micrograms per liter: 1,2,4 Trichlorobenzene chloroform; 1,2 Dichlorobenzene; 1,3 Dichlorobenzene; 1,4 Dichlorobenzene ethylbenzene; 1,1,1 Trichloroethane methylene chloride naphthalene; 2 Nitrophenol phenol bis (2-ethylhexyl) phthalate tetrachloroethylene toluene trichloroethylene; 2 Chlorophenol; 2,4 Dichlorophenol; 4 Nitrophenol pentachlorophenol di-n-butyl phthalate anthracene; 1,2 Diphenylhydrazine isophorone butyl benzyl phthalate; 1,1 Dichloroethylene; 2,4,6 Trichlorophenol carbon tetrachloride; 1,2 Dichloroethane; 1,1,2 Trichloroethane dichlorobromomethane.

"Twice per Month" when used as a sample frequency shall mean two samples per calendar month collected no less than 12 days apart.

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S DETERMINATION

- (A) The Commissioner has made a final determination and found that continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's final determination is based on Application No. 201501120 for permit modification received on February 13, 2015 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT MODIFICATION], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000006, issued by the Commissioner to the Permittee on June 29, 2011, the previous application submitted by the Permittee on January 12, 2007 and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0000006, issued by the Commissioner to the Permittee on June 29, 2011.
- (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT MODIFICATION] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000006, issued by the Commissioner to the Permittee on [DATE OF PERMIT MODIFICATION], Application No. 201501120 received by the Department on February 13, 2015, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0000006, issued by the Commissioner to the Permittee on [DATE OF PERMIT MODIFICATION].

- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance or other provisions that may be authorized under the Federal Clean Water Act or the CGS or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or CGS or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The discharges shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables below.

Table A

Discharge Serial Number: 001-1 **Monitoring Location:** 1

Wastewater Description: Large optics polishing, small optics fabricating, optical fabrication ultrasonic cleaning and edge grinding ultrasonic cleaning wastewaters

Monitoring Location Description: Auto sampler on the discharge line from the two 800 gallon batch treatment tanks

Discharge is to: The City of Danbury Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency	Sample Type or Measurement to be Reported
Aluminum, total	mg/l	NA	----	Monthly	Daily Composite	NA	NR	NA
Chromium, total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Copper, total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Flow rate, average daily ¹	gpd	10,000	NA	Daily	Total Daily Flow	NA	NR	NA
Flow, maximum during a 24 hour period ¹	gpd	NA	12,000	Daily	Total Daily Flow	NA	NR	NA
Flow, day of sampling	gpd	NA	12,000	Monthly	Total Daily Flow	NA	NR	NA
Fluoride	mg/l	20.0	30.0	Monthly	Daily Composite	45.0	NR	Grab
Lead, total	mg/l	0.1	0.5	Quarterly	Daily Composite	0.75	NR	Grab
pH, day of sampling	S.U.	NA	NA	NR	NA	6.0 – 10.0	Monthly	RDS
pH, minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous
pH, maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
Oil petroleum, total recoverable	mg/l	NA	100	Monthly	Grab Sample Average	150	NR	Grab
Silver, total	mg/l	0.1	0.5	Monthly	Daily Composite	0.75	NR	Grab
Total suspended solids	mg/l	NA	100	Monthly	Daily Composite	150	NR	Grab
Zinc, total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab

Footnotes:

¹ For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each sampling month.

² The first entry in this column is the ‘Sample Frequency’. If this entry is not followed by a ‘Reporting Frequency’ and the ‘Sample Frequency’ is more frequent than monthly, then the ‘Reporting Frequency’ is monthly. If the ‘Sample Frequency’ is specified as monthly, or less frequent, then the ‘Reporting Frequency’ is the same as the ‘Sample Frequency’.

Table B

Discharge Serial Number: 002-1					Monitoring Location: 1			
Wastewater Description: Treated optical cleaning and etching, electronic crystal wafers manufacturing , laboratory wastewaters and DI water system backwash								
Monitoring Location Description: Auto sampler on the discharge line from the two 800 gallon batch treatment tanks								
Discharge is to: The City of Danbury Water Pollution Control Facility								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency	Sample Type or Measurement to be Reported
Ammonia (as nitrogen), total	mg/l	NA	----	Monthly	Daily Composite	NA	NR	NA
Arsenic, total	mg/l	0.2	0.3	Monthly	Daily Composite	0.45	NR	NA
Chromium, hexavalent	mg/l	0.1	0.2	Monthly	Grab Sample Average	0.3	NR	Grab
Chromium, total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Flow, maximum during a 24 hour period ¹	gpd	NA	4,900	Daily	Total Daily Flow	NA	NR	NA
Flow, day of sampling	gpd	NA	4,900	Monthly	Total Daily Flow	NA	NR	NA
Fluoride, total	mg/l	20.0	30.0	Monthly	Daily Composite	45.0	NR	Grab
pH, day of sampling	S.U.	NA	NA	NR	NA	6.0 – 10.0	Monthly	RDS
pH, minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous
pH, maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
Total suspended solids	mg/l	NA	100	Monthly	Daily Composite	150.0	NR	Grab
Total toxic organics	mg/l	NA	NA	NR	NA	1.37	Quarterly	Grab
Zinc, total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab

Footnotes:

¹ For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Maximum Daily Flow for each sampling month.

² The first entry in this column is the ‘Sample Frequency’. If this entry is not followed by a ‘Reporting Frequency’ and the ‘Sample Frequency’ is more frequent than monthly, then the ‘Reporting Frequency’ is monthly. If the ‘Sample Frequency’ is specified as monthly, or less frequent, then the ‘Reporting Frequency’ is the same as the ‘Sample Frequency’.

- (B) All samples shall be comprised of only those wastewaters described in this schedule. Therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by the Department of Energy and Environmental Protection personnel, the Permittee or other parties.
- (D) The Permittee is not authorized to discharge circuit board flux wastewaters under this permit.

SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for total recoverable metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Water Permitting and Enforcement Division at the following address. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at the address below by the last day of the month following the month in which samples are taken.

Water Permitting and Enforcement Division (Attn: DMR Processing)
 Bureau of Materials Management and Compliance Assurance
 Connecticut Department of Energy and Environmental Protection
 79 Elm Street
 Hartford, CT 06106-5127

- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g., monthly, quarterly) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g., per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.

(E) NetDMR Reporting Requirements

1. Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection. Unless otherwise approved in writing by the Commissioner, no later than one-hundred and eighty (180) days after the issuance of this permit, the Permittee shall begin reporting electronically using NetDMR. Specific requirements regarding subscription to NetDMR, and submittal of data and reports in hard copy form and using NetDMR are described below:

a. Submittal of *NetDMR Subscriber Agreement*

On or before fifteen (15) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's discharge monitoring reports ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of DMR information. Information on NetDMR is available on the Department's website at www.ct.gov/deep/netdmr. On or before ninety (90) days after issuance of this permit, the Permittee shall submit a signed and notarized copy of the *Connecticut DEEP NetDMR Subscriber Agreement* to the Department.

b. Submittal of Reports Using NetDMR

Unless otherwise approved by the Commissioner, on or before one-hundred and eighty (180) days after issuance of this permit, the Permittee and/or the Signatory Authority shall begin electronically submitting DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement of Section 5(C) of this permit.

DMRs shall be submitted electronically to the Department no later than the thirtieth (30th) day of the month following the completed reporting period. All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs or other reports to the Department. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR. NetDMR is accessed from: <http://www.epa.gov/netdmr>.

c. Submittal of NetDMR Opt-Out Requests

If the Permittee is able to demonstrate a reasonable basis, such as technical or administrative infeasibility, that precludes the use of NetDMR for electronically submitting DMRs and reports, the Commissioner may approve the submission of DMRs and other required reports in hard copy form (“opt-out request”). Opt-out requests must be submitted in writing to the Department for written approval on or before fifteen (15) days prior to the date the Permittee would be required under this permit to begin filing DMRs and other reports using NetDMR. This demonstration shall be valid for twelve (12) months from the date of the Department’s approval and shall thereupon expire. At such time, DMRs and reports shall be submitted electronically to the Department using NetDMR unless the Permittee submits a renewed opt-out request and such request is approved by the Department.

All opt-out requests and requests for the NetDMR subscriber form should be sent to the following address or by email at deep.netdmr@ct.gov:

Attn: NetDMR Coordinator
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

- (F) Copies of all DMRs shall be submitted concurrently to the Danbury Water Pollution Control Facility (“WPCF”).
- (G) For Total Toxic Organics (“TTO”) monitoring specified in section 4(A), Table B of this permit, in accordance with section 22a-430-4(1) of the RCSA and 40 CFR 469.23 (Electric and Electronic Compounds Point Source Category), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. This certification statement shall be as follows:
- “Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report which required such certification. I further certify that this facility is implementing the solvent management plan submitted to the control authority.”*
- (H) If the Permittee submits a certification in lieu of monitoring pursuant to 40 CFR 469.23, incorporating 40 CFR 469.13(c) and (d), the Permittee must implement the solvent management plan approved by the control authority.

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

- (A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Water Permitting and Enforcement Division (Attn: DMR Processing) within thirty (30) days of the exceedance.
- (B) The Permittee shall immediately notify the Water Permitting and Enforcement Division and the Danbury WPCF of all discharges that could cause problems to the WPCF, including but not limited to slug loadings of pollutants which may cause a violation of the WPCF’s NPDES permit, or which may inhibit or disrupt the WPCF, its treatment processes or operations, or its sludge processes, use or disposal.

- (C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

SECTION 7: COMPLIANCE CONDITIONS

In accordance with 40 CFR 403.8(f)(2)(viii), the Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve (12) months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee that is a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six percent (66%) or more of all measurements taken for the same pollutant parameter during a six-month period exceed (by any magnitude) the average monthly, maximum daily, or maximum instantaneous limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six-month period equal or exceed the average monthly, maximum daily, or maximum instantaneous limit(s) multiplied by 1.4 for biochemical oxygen demand, total suspended solids or fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **Best Management Practices ("BMPs"):** Any other violation or group of violations, which may include failure to implement or follow BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

Permit No. SP0000006 issued on June 29, 2011 is hereby modified and superseded by this permit.

This permit modification is hereby issued on

Michael Sullivan
Deputy Commissioner
Department of Energy and Environmental Protection

MS/SCE

cc: Danbury WPCF

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Goodrich Corporation

PERMIT, ADDRESS, AND FACILITY DATA

Permit No. SP0000006

Application No. 201501120

<u>Mailing Address:</u> Street: 100 Wooster Heights Road City: Danbury ST: CT Zip: 06810	<u>Location Address:</u> Street: 100 Wooster Heights Road City: Danbury ST: CT
Contact Name: Steven Peterson Phone No.: 203-797-5000 Email: steven.peterson@utas.utc.com	DMR Contact: Same Phone No.: Same Email: Same

Permit information

Duration 5 Year X 10 Year 30 Year
 Type New Reissuance Modification X
 Categorization Point (X) Non-Point ()
 NPDES () Pretreatment (X) Groundwater (UIC) () Groundwater (Other) ()

NPDES Major (MA)
 NPDES Significant Minor or Pretreatment SIU (SI)
 NPDES or Pretreatment Minor (MI)
 Pretreatment Significant Industrial User (SIU) X
 Pretreatment Categorical (CIU) X

Pollution Prevention Mandate Environmental Equity Issue

Standard Industrial Classification ("SIC") Code: 3827

Secretary of State Business ID: 0081840

Solvent Management Plan

Is the facility operating under an approved solvent management plan? Yes X No
 Approved on: July 15, 2002

Compliance Issues

Compliance schedule: Yes No X
 Pollution prevention Treatment requirement Water conservation
 Water quality requirement Remediation Other
 Is the Permittee subject to a pending enforcement action? Yes No X

Permit No. SP0000006

Ownership Code

Private X Federal ___ State ___ Municipal (town only) ___ Other ___

DEEP Staff Engineer Stephen Edwards (Oluwatoyin Fakilede, 2011 reissuance)

Permit Fees

<u>Discharge Code</u>	<u>Discharge Category</u>	<u>DSN</u>	<u>Annual Fee</u>
519000c	Minor Tumbling and Cleaning	001-1	\$4,337.50
501020Y	Electrical and Electronic Components	002-1	\$4,330.00
5060000	Water Production Wastewater	002-1	\$600.00

Discharge Location

The discharges are to the City of Danbury’s POTW via its collection system.

Nature of Business Generating Discharge

Goodrich Corporation designs, develops, and manufactures precision optics and electro-optical systems and sensors, for defense, aerospace, scientific and commercial applications.

Process and Treatment Description (by Discharge Serial Number (“DSN”))

DSN001-1: Comprises of up to 12,000 gallons per day of large optics polishing wastewater, small optics fabricating and optical fabrication ultrasonic cleaning wastewater and edge grinding ultrasonic cleaning wastewater. Wastewaters are treated for solids removal in settling tanks and batch pH adjustment prior to discharging to sanitary sewer.

DSN 002-1: Comprises of up to 4,900 gallons per day of treated optical cleaning wastewater, etching wastewater, electronic crystal wafers manufacturing wastewater, and laboratory wastewaters (formerly DSN 014-1). Wastewaters undergo batch neutralization prior to discharge to sanitary sewer.

Resources Used to draft permit

- X Federal Effluent Limitation Guideline: 40 CFR 469, Subpart B Electrical and Electric Components (DSN 002)
- ___ Performance Standards
- ___ Federal Development Document
- ___ Treatability Manual
- X Department File Information
- ___ Connecticut Water Quality Standards
- ___ Anti-degradation Policy
- ___ Coastal Management Consistency Review Form
- X Other

Basis for Limitations, Standards or Conditions in 2011 Permit Reissuance

- X Pretreatment Standards for Existing Sources (PSES)
DSN 002-1:- TTO (MIL)

- X Case-by-Case Determination using Best Professional Judgment (See Other Comments)
DSN 001-1:- Aluminum (AML, MDL, MIL), lead (AML, MDL, MIL), pH (MIL), oil petroleum, total recoverable (MDL, MIL), total suspended solids (MDL, MIL) and zinc (AML, MDL, MIL)

DSN 002-1:- Ammonia (AML, MDL, MIL), arsenic (AML, MDL, MIL), pH (MIL) and total suspended solids (AML, MDL, MIL)

- X Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”)
DSN 002-1:- Chromium (AML, MDL, MIL), fluoride (AML, MDL, MIL), hexavalent chromium (AML, MDL, MIL) and zinc (AML, MDL, MIL)

Note: Corrected (2015) to show aluminum in DSN 001-1 and arsenic in DSN 002-1

AML: Average Monthly Limit, MDL: Maximum Daily Limit, MIL: Maximum Instantaneous Limit

COMMENTS FROM 2011 PERMIT REISSUANCE DATA TRACKING AND TECHNICAL FACT SHEET

Goodrich Corporation recorded several pH exceedances for DSN 001-1, but they believe that the exceedances were associated with improper pH probe location or cleaning, rather than with actual pH of the wastewater. The pH probe is now manually cleaned twice a month, relocated to allow it to constantly be inside the wastewater, and replaced annually. A portable pH meter was also purchased by the Permittee to verify pH readings should an exceedance occur. pH has been within the permit limits since April 2010 to November 2010.

Included in the DSN 002-1 discharge is reliability laboratory wastewater, which was formerly DSN 014-1 in the previous permit. This wastewater, which is associated with product quality assurance process, is composed of a maximum of 50 gpd, and was formerly discharged without treatment, or hauled away for off-site disposal if the pH is outside of the permit range. This wastewater is compatible with the DSN 002-1 treatment system, and has been re-routed into DSN 002-1.

There are two deionized water systems on site. The backwash from deionized water system in Area 144 discharges into the treatment system of DSN 002-1 while the backwash from deionized water system in Area 90 is permitted under a general permit and is discharged downstream of the sampling location of DSN 002-1.

Oil petroleum, total recoverable will be the permit parameter used in this permit, replacing total oil and grease used in the previous permit.

A limit was included for total toxic organics in Table B, in accordance with the federal effluent limitation guidelines for electrical and electronics component categorical discharge (40 CFR 469, Subpart B).

The Permittee no longer generates circuit board flux wastewater because circuit boards are no longer manufactured on site. Therefore, limits and monitoring requirements for copper, lead, nickel and tin that were associated with the discharge of circuit board wastewater are not included in this permit. Also, a review of the Permittee’s discharge monitoring reports (DMRs) showed very low concentrations of these metals in the wastewater. Permit language stating that the Permittee is not authorized to discharge circuit board flux wastewater was included as remark a) in Table B.

The limits for lead, oil petroleum, total recoverable, total suspended solids and zinc in DSN 001-1 and total suspended solids in DSN 002-1 were developed based on a Case by Case Determination using the criteria of Best Professional Judgment. These limits are consistent with the previous permit in accordance with the anti-backsliding rule. Limits were included for arsenic based on historical effluent data. A review of the facility’s DMRs showed that the Permittee should not have any problems meeting these limits.

2015 PERMIT MODIFICATION

Basis for Limitations, Standards or Conditions in 2015 Permit Modification

Outfall	Parameter	Basis for Limits		
		22a-430(s)	Case by Case	40 CFR 469
001-1	aluminum		AML, MDL, MIL	
	chromium, total		AML, MDL, MIL	
	copper		AML, MDL, MIL	
	fluoride		AML, MDL, MIL	
	lead		AML, MDL, MIL	
	pH		MIL	
	oil petroleum, total recoverable		AML, MDL, MIL	
	silver		AML, MDL, MIL	
	TSS		AML, MDL, MIL	
	zinc		AML, MDL, MIL	
002-1	ammonia		AML, MDL, MIL	
	arsenic		AML, MDL, MIL	
	chromium, hexavalent	AML, MDL, MIL		
	chromium, total	AML, MDL, MIL		
	fluoride	AML, MDL, MIL		
	pH		MIL	
	TSS		AML, MDL, MIL	
	TTO			MIL
zinc	AML, MDL, MIL			

AML: Average Monthly Limit, MDL: Maximum Daily Limit, MIL: Maximum Instantaneous Limit

COMMENTS ON 2015 PERMIT MODIFICATION

On February 13, 2015, Goodrich Corporation submitted application No. 201501120 requesting to modify DSN 001-1 of discharge permit SP0000006 to include wastewater generated from an additional cleaning line and a proposed new process at their facility. DSN 001-1 is comprised of wastewater from cleaning, grinding and polishing glass optics. Once polished, a metal coating is vacuum plated onto the glass optic. There is no wastewater discharged from the vacuum plating operation. The proposed process is an acid stripping operation to remove metal from the vacuum-plated parts that fail quality testing. After the metal coating is stripped, the glass optic will be returned for cleaning and polishing before it is again vacuum plated. All wastewater associated with the stripping operation will be shipped off site for disposal.

Goodrich Corporation believes that the acid stripping operation is equivalent to an etching/milling process, one of the six primary metal finishing operations under 40 CFR 433.10. Therefore, Goodrich Corporation feels that rinse waters from the glass cleaning, polishing and grinding processes would be considered metal finishing wastewaters because the cleaning, polishing and grinding metal finishing subcategories are three of the 40 secondary metal finishing operations listed in 40 CFR 433.10.

Although acid stripping does not exactly match the EPA definition of etching/milling, Department staff agrees that in this case, the stripping operation could be equated to etching. However, cleaning, grinding and polishing glass, even glass processed through the stripping operation, is not metal finishing. Therefore, since there is no discharge from either the vacuum plating or etching processes, DSN 001 would not be regulated under EPA’s metal finishing categorical standards in 40 CFR 433. This was confirmed with Justin Pimpare (specialist from EPA New England for pretreatment issues) in a phone conversation on August 19, 2015.

This permit modification adds monthly monitoring requirements and limits for total chromium, copper and silver, the metals

vacuumed coated onto the glass optics, for DSN 001-1. Limits for these parameters were established on a case-by-case basis using best professional judgment. Once monitoring information of the resulting discharge is available and the actual concentrations of these metals in DSN 001-1 is known, the monitoring frequency may be reduced.

Since fluoride is commonly used in the processes that contribute wastewater to DSN 001-1, monthly monitoring requirements for fluoride with applicable limits from section 22a-430-4(s)(2) of the RCSA were added with this modification. It appears that the limits and monitoring requirements for fluoride were inadvertently omitted when the permit was reissued in 2011.

For DSN 001-1, the 2011 permit identifies the monitoring location as “Effluent flow measurement flume in garage bay”. This was modified to “Auto sampler on the discharge line from the two 800 gallon batch treatment tanks” to clarify and more accurately describe the monitoring location.

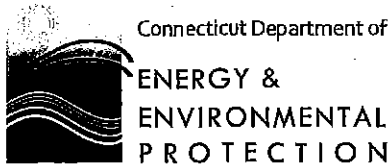
For DSN 002-1, the 2011 permit identifies the monitoring location as “Neutralization system effluent”. This was modified to “Auto sampler on the discharge line from the two 800 gallon batch treatment tanks” to clarify and more accurately describe the monitoring location.

The definition from 40 CFR 469.22 for the term “total toxic organics” (“TTOs”) was added to Section 2(B) of the permit.

The instructions contained in section 5(G) of the permit of how to certify to compliance with an approved solvent management plan in lieu of monitoring for TTOs were clarified and changed to match the language contained in 40 CFR 469.23.

Section 5(H) was added to make clear that the Permittee must followed its approved solvent manage plan should they chose to submit a certification in lieu of monitoring for TTOs.

Remark a) in Table B, “The Permittee is not authorized to discharge circuit board flux wastewaters under this permit.”, was moved to section 4(D) of the permit.



**NOTICE OF TENTATIVE DECISION OF
INTENT TO MODIFY A STATE PERMIT FOR THE FOLLOWING DISCHARGES
INTO THE WATERS OF THE STATE OF CONNECTICUT**

TENTATIVE DETERMINATION

The Commissioner of Energy and Environmental Protection (the "Commissioner") hereby gives notice of a tentative decision to modify a permit based on an application submitted by **Goodrich Corporation** ("the applicant") under section 22a-430 of the Connecticut General Statutes for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative decision that continuance of the existing system to treat the proposed altered discharge will protect the waters of the state from pollution. The Commissioner proposes to modify the applicant's permit for its discharge to the Danbury Water Pollution Control Facility.

The proposed permit, if issued by the Commissioner, will require that all wastewater be treated to meet the applicable effluent limitations and periodic monitoring to demonstrate that the discharge will not cause pollution.

APPLICANT'S PROPOSAL

Goodrich Corporation proposes to modify its current pretreatment permit, SP0000006, to authorize the discharge of wastewater generated from cleaning, grinding and polishing of glass optics following acid stripping of metal coatings. The company proposes to continue to discharge up to 16,900 gallons per day ("gpd") of treated wastewaters to the Danbury Water Pollution Control Facility (12,000 gpd through Discharge Serial Number ("DSN") 001-1 and 4,900 gpd through DSN 002-1).

The name and mailing address of the permit applicant are: Goodrich Corporation, 100 Wooster Heights Road, Danbury, CT 06810.

The proposed activity will take place at: 100 Wooster Heights Road, Danbury, CT.

REGULATORY CONDITIONS

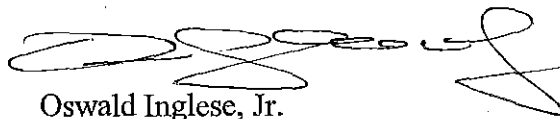
Type of Treatment

DSN 001 - Wastewaters are treated for solids removal in settling tanks and batch pH adjustment prior to discharge to the sanitary sewer.

thirty (30) days of this public notice. Written comments should be directed to Stephen Edwards, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby, and shall hold a hearing upon receipt of a petition signed by at least twenty-five (25) persons. Notice of any public hearing shall be published at least thirty (30) days prior to the hearing.

Petitions for a hearing should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. Original petitions must be *mailed or delivered* to: DEEP Office of Adjudications, 79 Elm Street, 3rd floor, Hartford, CT, 06106-5127. Petitions cannot be sent by fax or email. Additional information can be found at www.ct.gov/deep/adjudications.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action and Equal Opportunity Employer that is committed to complying with the Americans with Disabilities Act. To request an accommodation contact us at (860) 418-5910 or deep.accommodations@ct.gov.



Oswald Inglese, Jr.

Director

Water Permitting and Enforcement Division

Bureau of Materials Management and Compliance Assurance

Dated:

NOV 24 2015