



PRETREATMENT PERMIT

issued to

Click Bond, Inc.
18 Park Road
Watertown, CT 06795

Location Address:

18 Park Road
Watertown, CT 06795

Issuance Date: [TBD – Upon Signature]
Effective Date: [1st of the Month following
Issuance Date-for renewals

Expiration Date: [Five (5) Years from Effective
Date]

Permit ID: SP0000920

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued 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 Title 40 of the Code of Federal Regulations Part 403 ("40 CFR Part 403").
- (B) Click Bond, Inc., ("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
- (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, 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:

"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.

"Batch" means each separate volume of wastewater processed through the approved treatment system.

"Continuous", as a sample frequency, means data points must be collected and recorded by a continuous monitoring device in at least one-minute intervals for as long as a discharge occurs.

"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.

"Instantaneous", as a sample type, means a grab sample collected with automatic equipment or in-line analysis with automated instrumentation.

"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.

"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.

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

SECTION 3: COMMISSIONER'S FINAL DETERMINATION

- (A) The Commissioner has made a final determination and found that the 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. 201909570 for permit reissuance received on August 28, 2019, Application No. 202201778 for permit modification received on February 23, 2022, and the administrative record established in the processing of those applications.
- (B) From the effective date of this permit, for a term not to exceed five years and 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. SP0000920, issued by the Commissioner to the Permittee on the issuance date, Application Nos. 201909570 and 202201778 received by the Department of Energy and Environmental Protection ("Department") on August 28, 2019, and February 23, 2022, respectively, 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. SP0000920, following the issuance date of this permit.
- (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 the specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables below.

Table A

		FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
PARAMETER	UNITS	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 ²	Sample Type or Measurement to be Reported
Aluminum, Total	mg/L	NA	----	Monthly	Daily Composite	NA	NR	NA
Cadmium, Total	mg/L	0.07	0.11	Semi-Annually	Daily Composite	0.11	NR	Grab
Chromium, Total	mg/L	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Copper, Total	mg/L	0.4	0.6	Monthly	Daily Composite	0.9	NR	Grab
Cyanide, Total	mg/L	0.64	1.19	Semi-Annually	Grab Sample Average	1.19	NR	Grab
Flow, Average Daily ¹	gpd	----	NA	Daily//Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	16,000	Daily//Monthly	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	16,000	Monthly	Daily Flow	NA	NR	NA
Lead, Total	mg/L	0.1	0.5	Semi-Annually	Daily Composite	0.5	NR	Grab
Nickel, Total	mg/L	0.4	0.6	Monthly	Daily Composite	0.9	NR	Grab
Oil & Grease, Non-polar Material	mg/L	NA	100.0	Semi-Annually	Grab Sample Average	150.0	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	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Phosphorus, Total	mg/L	NA	----	Quarterly	Daily Composite	NA	NR	NA
Silver, Total	mg/L	0.1	0.43	Semi-Annually	Daily Composite	0.43	NR	Grab
Suspend Solids, Total	mg/L	NA	100.0	Monthly	Daily Composite	150.0	NR	NA
Toxic Organics, Total ³	mg/L	NA	NA	NR	NA	2.11	Semi-Annually	Grab
Zinc, Total	mg/L	0.47	0.72	Monthly	Daily Composite	1.08	NR	Grab

Table Footnotes and Remarks:

Footnotes:

¹ For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each 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'.

³ In accordance with section 22a-430-4(l) of the RCSA and 40 CFR 433 (Metal Finishing), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. See section 5(H) of this permit for the certification statement.

Remarks:

1. Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.
2. If "----" is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

Table B

		FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
PARAMETER	UNITS	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 ²	Sample Type or Measurement to be Reported
Discharge Serial Number: 202		Monitoring Location: 1						
Wastewater Description: Passivation and brightening wastewater (rinses and spent solution)								
Monitoring Location Description: Sample port on the bag filter effluent								
Discharge is to: Waterbury WPCF								
Cadmium, Total	mg/L	0.07	0.11	Semi-Annually	Composite ³	0.11	NR	Grab
Chromium, Total	mg/L	1.0	2.0	Monthly	Composite ³	3.0	NR	Grab
Copper, Total	mg/L	0.54	0.73	Monthly	Composite ³	1.09	NR	Grab
Cyanide, Total	mg/L	0.65	1.2	Semi-Annually	Grab Sample Average	1.2	NR	Grab
Flow, Average Daily ¹	gpd	----	NA	Daily//Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	4,000	Daily//Monthly	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	4,000	Monthly	Daily Flow	NA	NR	NA
Fluoride	mg/L	20.0	30.0	Monthly	Composite ³	45.0	NR	Grab
Lead, Total	mg/L	0.1	0.5	Semi-Annually	Composite ³	0.5	NR	Grab
Nickel, Total	mg/L	0.63	0.85	Monthly	Composite ³	1.28	NR	Grab
Nitrogen, Nitrate (total as N)	mg/L	----	----	Quarterly	Composite ³	NA	NR	NA
Oil & Grease, Non-polar Material	mg/L	NA	100.0	Semi-Annually	Grab Sample Average	150.0	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	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Phosphorus, Total	mg/L	NA	----	Quarterly	Composite ³	NA	NR	NA
Silver, Total	mg/L	0.1	0.43	Semi-Annually	Composite ³	0.43	NR	Grab
Suspend Solids, Total	mg/L	NA	100.0	Monthly	Composite ³	150.0	NR	Grab
Toxic Organics, Total ⁴	mg/L	NA	NA	NR	NA	2.13	Semi-Annually	Grab
Zinc, Total	mg/L	0.47	0.72	Monthly	Composite ³	1.08	NR	Grab

Table Footnotes and Remarks:

Footnotes:

¹ For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each 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'.

³ Composite samples shall be comprised of a minimum of three grab samples collected from each batch discharged on the day of sample collection. Grab samples shall be collected during the first 10% of the discharge, the middle 10% of the discharge, and the last 10% of the discharge.

⁴ In accordance with section 22a-430-4(l) of the RCSA and 40 CFR 433 (Metal Finishing), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. See section 5(H) of this permit for the certification statement.

Remarks:

1. Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.
2. If "----" is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

- (B) All samples shall be comprised of only those wastewaters described in this permit. 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 personnel, the Permittee, or other parties.

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) 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 Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division within thirty (30) days of the date of the analytical laboratory report identifying the exceedance.
- (C) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR 136 unless otherwise specified.
- (D) The results of chemical analysis required above shall be entered on the DMR and reported to the Bureau of Materials Management and Compliance Assurance using NetDMR. 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 submitted in NetDMR by the last day of the month following the month in which samples are taken.
- (E) If this permit requires monitoring of a discharge on a calendar basis (e.g. monthly, quarterly, etc.) 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.
- (F) DMR Reporting Requirements
 - (1) The Permittee must submit monitoring data and other reports to the Department electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection.
 - a. Submittal of Reports Using NetDMR

The Permittee and/or the Signatory Authority shall electronically submit DMRs and reports required under this permit to the Department using NetDMR, in satisfaction of the DMR submission requirement of Section 5(D) of this permit.

DMRs shall be submitted electronically no later than the last day of the month following the required sampling 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 and associated attachments 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>.
- (G) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority(ies) ("WPCA") involved in the treatment and collection of the permitted discharge.

- (H) For Total Toxic Organics (TTO) monitoring, in accordance with section 22a-430-4(1) of the RSCA and 40 CFR 433 (Metal Finishing), 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 responsible for managing compliance with the permit limitation 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 approved by the Commissioner.”

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

(A) Noncompliance Notifications:

- (1) In accordance with Sections 22a-430-3(j)(8), 22a-430-3(j)(11)(D), 22a-430-3(k)(4), and 22a-430-3(i)(3) of the RSCA, the Permittee shall notify the Commissioner of the following actual or anticipated noncompliance with the terms or conditions of this permit within two hours of becoming aware of the circumstances. All other actual or anticipated violations of the permit shall be reported to the Commissioner within 24 hours of becoming aware of the circumstances:
- A noncompliance that is greater than two times an effluent limitation;
 - Any condition that may endanger human health or the environment;
 - Any condition that may endanger the operation of a POTW, including sludge handling and disposal;
 - A failure or malfunction of monitoring equipment used to comply with the monitoring requirements of this permit;
 - Any actual or potential bypass of the Permittee’s collection system or treatment facilities; or
 - Expansions or significant alterations of any wastewater collection, treatment facility, or its method of operation for the purpose of correcting or avoiding a permit violation.

- (2) Notifications shall be submitted via the Commissioner’s online Noncompliance Notification Form: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.

- (3) Within five days of any notification of noncompliance in accordance with Sections 6(A)(1)(a) through 6(A)(1)(f) of this permit, the Permittee shall submit a follow-up report within five days of the noncompliance using the Commissioner’s online Noncompliance Follow-up Report Form: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.

The follow-up report shall contain, at a minimum, the following information: (i) A description of the noncompliance and its cause; (ii) the period of noncompliance, including exact dates and times; (iii) if the noncompliance has not been corrected, the anticipated time it is expected to continue; and (iv) steps taken or planned to correct the noncompliance and reduce, eliminate and prevent recurrence of the noncompliance.

- (4) Within 30 days of any notification of facility modifications reported in accordance with Section 6(A)(1)(f) of this permit, the Permittee shall submit a written follow-up report by submitting a “Facility and Wastewater Treatment System Modification Request for Determination” for the review and approval of the Commissioner. The report shall fully describe the changes made to the facility and reasons therefore.

- (5) Notification of an actual or anticipated noncompliance or facility modification does not stay any term or condition of this permit.

- (B) In accordance with Section 22a-430-3(j)(11)(E) of the RSCA, the Permittee shall notify the Commissioner within 72 hours and in writing within 30 days when he or she knows or has reason to believe that the concentration in the discharge of any substance listed in the application, or any toxic substance as listed in Appendix B or D of RSCA Section 22a-430-4, has exceeded or will exceed the highest of the following levels: (1) One hundred micrograms per liter; (2) Two hundred micrograms per liter for acrolein and acrylonitrile, five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter for antimony; (3) An alternative level specified by the Commissioner, provided such level shall not exceed the level which can be achieved by the Permittee’s treatment system; or (4) A level two times the level specified in the Permittee’s application.

72 hour initial notifications shall be submitted via the Commissioner’s online Noncompliance Notification Form. 30 day follow-up reports shall be submitted via the Commissioner’s online Noncompliance Follow-up Report Form. The Forms are available at the Commissioner’s website, here: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial->

SECTION 7: COMPLIANCE SCHEDULE

- (A) The Permittee shall assure compliance with the terms and conditions of this Permit and sections 22a-430-3 and 4 of the RCSA in accordance with the following schedule:
- (1) On or before thirty (30) days after the effective date of this permit, the Permittee shall employ or retain one or more qualified professionals acceptable to the Commissioner to prepare the documents and implement or oversee the actions required by this section of the permit and shall, by that date, notify the Commissioner in writing of the identity of such professionals. Such professionals employed or retained by the Permittee shall have demonstrated knowledge of the per- and polyfluorinated alkyl substances (PFAS) and the sampling protocols and analytical laboratory methods associated with identifying and quantifying PFAS. The Permittee shall employ or retain one or more qualified professionals acceptable to the Commissioner until the actions required by this section of the permit have been completed, and within ten (10) days after employing or retaining any professional(s) other than one(s) originally identified under this paragraph, the Permittee shall notify the Commissioner in writing of the identity of such other professional. The Permittee shall submit to the Commissioner a description of a professional's education, experience and training, which is relevant to the work required by this permit within ten (10) days after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable professional unacceptable.
 - (2) On or before one-hundred and twenty (120) days after the effective date of this permit, the Permittee shall submit for the Commissioner's review and approval a sampling plan on which to take a minimum of two (2) separate and distinct samples each of the discharge associated with DSN 201 and DSN 202 for analysis. A sampling location must be selected in a location prior to dilution with unlike waste streams. PFAS analyses shall be performed using the methods approved by EPA pursuant to 40 CFR 136 and by a laboratory certified to conduct such test methods. If no such test method is approved by EPA pursuant to 40 CFR 136, PFAS analyses shall be performed in accordance with EPA Method 1633 (see <https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas>). At a minimum this plan must identify the test method, laboratory, schedule of sampling events, sampling protocols including sample quality control procedures to be implemented, sampling locations, and number and volume of samples to be collected at each location.
 - (3) The Permittee shall perform the approved actions in accordance with the approved sampling plan, but in no event shall the approved actions be completed later than ninety (90) days after the approval of the sampling plan submitted pursuant to Section 7(A)(2) of this permit. Within thirty (30) days after receiving analysis results, the Permittee shall submit all sample results generated as a result of executing the approved plan to the Commissioner in writing.
- (B) The Permittee shall submit to the Commissioner all documents required by this section of the permit in a complete and approvable form. If the Commissioner notifies the Permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the Permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty (30) days of the Commissioner's notice of deficiencies. In approving any document or other action under this Compliance Schedule, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this section of the permit. Nothing in this paragraph shall excuse noncompliance or delay.
- (C) Dates. The date of submission to the Commissioner of any document required by this section of the permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three (3) days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" as used in this section of the permit means calendar day. Any document or action which is required by this section of the permit to be submitted, or performed, by a date which falls on, Saturday, Sunday, or a Connecticut or federal holiday, shall be submitted or performed on or before the next day which is not a Saturday, Sunday, or Connecticut or federal holiday.
- (D) Notification of noncompliance. In the event that the Permittee becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this section of the permit or of any document required hereunder, the Permittee shall notify the Commissioner within 24 hours and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, minimized to the greatest extent possible. In so notifying the

Commissioner, the Permittee shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and the Permittee shall comply with any dates, which may be approved in writing by the Commissioner. Notification by the Permittee shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.

- (E) Notice to Commissioner of changes. Within fifteen (15) days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this section of the permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the correct or omitted information to the Commissioner.
- (F) Submission of documents. Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit shall, unless otherwise specified in writing by the Commissioner, be directed to:

Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
DEEP.waterpermittingenforcement@ct.gov
With the subject line: "Attn: Permit No. SP0000920"

SECTION 8: 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 or by posting on the Department's public website, 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 (66%) percent 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 (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 BOD, TSS, 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.
- **BMPs:** Any other violation or group of violations, which may include a violation of Best Management Practices, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

DRAFT

Jennifer L. Perry, P.E.
Bureau Chief
Bureau of Materials Management and Compliance Assurance

JLP/sj

DRAFT

Pretreatment Permit Reissuance & Modification
Fact Sheet

APPLICANT	CLICK BOND, INC.
PERMIT NO.	SP0000920
APPLICATION NOS.	201909570 (renewal) 202201778 (modification)
DATE APPLICATIONS RECEIVED	August 28, 2019 (201909570) February 23, 2022 (202201778)
LOCATION ADDRESS	18 Park Road Watertown, CT 06795
FACILITY CONTACT	Laurie Shakley, General Manager, Watertown Plant Operations Office Phone: (860) 274-5435 Email: Laurie.Shakley@clickbond.com
MAILING ADDRESS	18 Park Road Watertown, CT 06795
DMR CONTACT	Laurie Shakley Office Phone: (860) 274-5435 Email: Laurie.Shakley@clickbond.com
PERMIT TERM	5 Years
PERMIT CATEGORY	PRETREATMENT SIGNIFICANT INDUS USER (SIU) PRETREATMENT CATEGORICAL (CIU)
SIC CODES	3471, 3469
NAICS CODE	336413
PERMIT TYPE	Reissuance & Modification
OWNERSHIP	Private
PUBLICLY OWNED TREATMENT WORKS ("POTW") THAT RECEIVES THE DISCHARGE	Discharge to the Waterbury Water Pollution Control Facility ("WPCF") via Town of Watertown collection system. NPDES Permit No. CT0100625. Discharges to the Naugatuck River.
DEEP STAFF ENGINEER	Seth Jones Office Phone: 860-424-3049 Email: seth.jones@ct.gov

DATE APPLICATION PUBLIC NOTICED/ NAME OF PAPER	July 16, 2019, in the Republican-American (Waterbury)
DATE SUFFICIENCY REVIEW COMPLETED	December 2, 2019 (201909570) January 11, 2023 (202201778)
APPLICATION TIMELY AND SUFFICIENT	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
TENTATIVE DECISION FACT SHEET DATE	July 29, 2024

SECTION 1.0 PERMIT FEES

Application Fee (Application No.):

Filing Fee (201909570)	Cost: \$1,300	Date Paid: 08/28/2019
Processing Fee (201909570)	Cost: \$16,900	Date Paid: 11/26/2019
Filing Fee (202201778)	Cost: \$940	Date Paid: 02/23/2022

Annual Fee:

	WASTEWATER CATEGORY (per 22a-430-7)	FLOW CATEGORY	DSN	ANNUAL FEE (per 22a-430-7 and CGS 22a-6f)
	<i>Metal Finishing (to POTW)</i>	>10,000 gpd	201, 202	\$8,425.00
	<i>Blowdown from Heating and Cooling Equipment</i>	All discharges	201	\$4,337.50
TOTAL				\$12,762.50

Note: Floor washing wastewater is non-significant with respect to total facility flow and therefore will be excluded from the annual fees in accordance with RCSA Section 22a-430-7(g).

SECTION 2.0 DECSRIPTION OF WASTE STREAMS

The applicant seeks authorization for the following:

DSN	PROPOSED AVERAGE DAILY FLOW (gpd)	PROPOSED MAXIMUM DAILY FLOW (gpd)	PROPOSED WASTESTREAMS	TREATMENT TYPE	DISCHARGE TO
201	----	16,000	Wastewater from parts cleaning, press stamping, quality control ("QC") lab testing, floor washing, and boiler blowdown	Ultrafiltration and pH adjustment	Waterbury WPCF
202	----	4,000	Passivation and brightening wastewater (rinses and spent solution)	pH adjustment, coagulation, flocculation, solids settling and filtration	Waterbury WPCF

SECTION 3.0 BACKGROUND & PERMIT HISTORY

Click Bond, Inc. is a business that performs metal stamping parts production. The treatment system is used to treat wastewater from metal stamping, parts cleaning,

passivation, and brightening. The POTW did not bring up any issues/concerns with the discharge at the time of the technical review.

The Operation and Maintenance (“O&M”) Plans for DSN 201 and DSN 202 were last revised on November 14, 2023, and November 29, 2023, respectively.

3.1 Solvent Management Plan

Is the facility operating under an approved solvent management plan (SMP)?

Yes No N/A

If yes, indicate date approval was issued: December 21, 2023

3.2 Compliance/Enforcement

3.2.1 Effluent Violations:

See **Attachment A** for a 5-year effluent violations report (2018-2023).

3.2.2 Is the Permittee subject to an ongoing enforcement action? Yes No

3.2.3 Does the Permit contain a compliance schedule (CS)? Yes No

If yes, please check all that apply.

Pollution Prevention Water Conservation Remediation
 Water Quality Requirement Treatment Requirement Other

DEEP is acquiring per- and polyfluoroalkyl substances’ (“PFAS”) concentration data to support further regulatory evaluation regarding the identification of contributing sources of such substances to the state’s publicly owned treatment works (“POTWs”). As such, this permit contains a compliance schedule which requires the permittee to develop and implement a PFAS sampling plan for its discharge.

3.3 Modifications

Within the last five years, have there been any permit modifications?

Yes No

Application No. 202107843

Date Rejected: July 21, 2021

Summary: Rejected request to pipe wastewaters generated from metallurgical testing and fluorescent penetrant inspection in the quality control laboratory into existing discharge, DSN 201-1, in accordance with Section 22a-430-3(i)(2) of the Regulations of Connecticut State Agencies (“RCSA”). This request has been resubmitted to DEEP as a permit modification application (Application No. 202201778).

Application No. 202106995

Date Approved: June 8, 2021

Summary: Authorized to use parts cleaning chemical Mirage EZ 607 in the Ransohoff Parts Washer in place of Lusterclean 40 LF in accordance with Section 22a-430-3(i)(2) of the RCSA. The change was implemented in June 2021.

Application No. 202100324

Date Approved: January 27, 2021

Summary: Authorized to install a new front-loading basket type industrial parts washer in accordance with Section 22a-430-3(i)(2) of the RCSA. The new equipment was installed in March 2021.

Application No. 201908138

Date Approved: July 29, 2019

Summary: Authorized to install 25% caustic soda feed system to be in addition to the existing 50% caustic soda feed system for pH adjustment in the wastewater treatment system (DSN 202) in accordance with Section 22a-430-3(i)(3) of the RCSA. The change was implemented in July 2019.

Application No. 201704708

Date Approved: August 3, 2017

Summary: Authorized to install a new cleaning process utilizing a vibratory tumbling machine. This new cleaning process will remove machining oil and metal contaminants from stainless steel parts. Wastewater generated from the new process will be discharged to the ultra-filtration membrane system for DSN 201-1. This request was approved in accordance with Section 22a-430-3(i)(2) of the RCSA. The new equipment was installed in August 2017.

Application No. 201703850

Date Approved: May 25, 2017

Summary: Authorized to install a ball valve with an actuator downstream of the pH sensor (DSN 202) and a solenoid valve on the air supply to the discharge pump. These valves are only opened when the pH of the treated wastewater is in the range of 8.0-9.5 S.U. This request was approved in accordance with Section 22a-430-3(i)(3) of the RCSA. The change was implemented in June 2017.

3.4 Permits for other Discharges

Click Bond, Inc. has made a No Exposure Certification under the General Permit for the Discharge of Stormwater Associated with Industrial Activity (GSE000074).

SECTION 4.0 THE ON-SITE WASTEWATER TREATMENT SYSTEM

Click Bond, Inc. operates and maintains two separate wastewater treatment systems, one for each DSN:

DSN 201 – Wastewater from press stamping operations, parts washing, boiler blowdown, floor washing, and quality control lab testing (fluorescent penetrant inspection and a mold forming operation) are conveyed to an Abcor ultrafiltration treatment system via the facility's floor trench system. The wastewater is neutralized following ultrafiltration prior to discharge to the sanitary sewer. The system can be run in a continuous or batch configuration.

DSN 202 – Wastewater (rinses and spent baths) generated from a passivating and brightening operation are pumped to a batch treatment system consisting of pH adjustment, coagulation, flocculation, settling, and filtration prior to discharge to the sanitary sewer.

See **Attachment B** for the process flow diagram of the facility.

SECTION 5.0 EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Click Bond initiated the discharge of metal finishing wastewater (DSN 202) after August 31, 1982, the metal finishing regulations proposal date. Therefore, the facility is a new source, subject to the Pretreatment Standards for New Sources (PSNS) in 40 CFR 433.17. DSN 201, which consists of wastewater from ancillary metal finishing operations, was

categorized as metal finishing wastewater subject to 40 CFR 433.17 following the initiation of DSN 202 in accordance with 40 CFR 433.10.

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		DISCHARGE POINT(S)
<input checked="" type="checkbox"/>	Federal Effluent Limitation Guideline (“ELG”) – 40 CFR 403	201, 202
<input type="checkbox"/>	Pretreatment Standards for Existing Sources (“PSES”)	
<input checked="" type="checkbox"/>	Pretreatment Standards for New Sources (“PSNS”) – 40 CFR 433.17	201, 202
<input checked="" type="checkbox"/>	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”)	201, 202
<input checked="" type="checkbox"/>	Case-by-Case Determination using Best Professional Judgment (“BPJ”) RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	201, 202
<input checked="" type="checkbox"/>	Anti-Backsliding – RCSA Section 22a-430-4(l)(4)(D)(vi)	201, 202
<input checked="" type="checkbox"/>	Other (“Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works”, USEPA, 1975-628-875)	201, 202

5.1 MONITORING PARAMETERS & LIMITS:

5.1.1 Local Limits

The Department of Energy and Environmental Protection (“DEEP”) is authorized by the Environmental Protection Agency (“EPA”) to administer the federal pretreatment program at the state-level as allowed by 40 CFR 403.10(e), as both the approval and control authority. EPA provides DEEP that authorization via a modified Memorandum of Agreement (“MOA”) dated June 3, 1981.

In Connecticut, all discharges must comply, at a minimum, with the general and specific prohibitions of the federal pretreatment standards and Section 22a-430-4(t) of the RCSA. To assure such compliance is achieved, state-issued pretreatment permits apply federal categorical and state regulatory standards and effluent limitations. DEEP may also apply additional or more stringent effluent limitations based on Best Professional Judgment pursuant to the RCSA Section 22a-430-4(m), including local limits if such local limits were technically based, to mitigate the risk for a pollutant discharge to negatively impact receiving waters and/or the POTW’s operations, including sludge handling or disposal, worker health or safety, or otherwise interfere with the POTW’s ability to comply with its own NPDES permit.

In accordance with 40 CFR 403.5(c)(2), POTWs shall develop and enforce specific effluent limits for Industrial Users (“IUs”) to both prevent pass through and interference, and to keep the POTW in compliance with their NPDES permit or sludge use or disposal practices. In the State’s MOA with the EPA, the State must “assure that [the] development of specific limits for discharges of prohibited pollutants under 40 CFR 403.5(c) is at least as extensive as would have been required if these POTWs had developed local programs.” To comply with this agreement, the State will only utilize local limits developed technically [40 CFR 122.44(j)(2)(ii)] in accordance with EPA’s July 2004 Local Limits Development Guidance (EPA 833-R-04-002A) in a state permit. Local limits not incorporated into state pretreatment permits remain enforceable by the municipality as allowed by the local sewer use ordinance.

5.1.2 Slug Loading

Connecticut discharge regulations do not allow what is defined as a “slug loading” in 40 CFR 403.8(f)(2)(vi). The items listed in the definition are regulated as a spill or unplanned release under Section 22a-449 of the RCSA and/or as an unpermitted discharge under Section 22a-430 of the RCSA. The Department’s practice of applying instantaneous limits in permits further regulates slug loading. The Department’s various standard regulatory requirements governing including, but not limited to, proper operation and maintenance (RCSA Section 22a-430-3(f)); sludge disposal (RCSA Section 22a-430-3(g)); duty to mitigate (RCSA Section 22a-430-3(h)); facility modification and notification (RCSA Section 22a-430-3(i)); monitoring records and reporting requirements (RCSA Section 22a-430-3(j)); bypass (RCSA Section 22a-430-3(k)); effluent limitation violations (RCSA Section 22a-430-3(m)); resource conservation (RCSA Section 22a-430-3(o)); spill prevention and control (RCSA Section 22a-430-3(p)); instrumentation, alarm, flow recorders (RCSA Section 22a-430-3(q)); equalization (RCSA Section 22a-430-3(r)); and the practice of applying monitoring requirements and instantaneous limits in permits further regulate slug loading.

5.1.3 Effluent Limits

DSN 201

Parameter	Units	40 CFR 433.17			RCSA Section 22a-430-4(s)(2)			CWF (Dilution Factor = 0.991)			BPJ		
		Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Aluminum, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Cadmium, Total	mg/L	0.07	0.11	NA	0.07	0.11	0.75	0.07	0.11	NA	NA	NA	0.11
Chromium, Total	mg/L	1.71	2.77	NA	1.0	2.0	3.0	1.69	2.74	NA	NA	NA	NA
Copper, Total	mg/L	2.07	3.38	NA	1.0	2.0	3.0	2.05	3.35	NA	0.4	0.6	0.9
Cyanide, Total	mg/L	0.65	1.20	NA	0.65	1.2	NA	0.64	1.19	NA	NA	NA	1.19
Flow Rate, Average Daily	gpd	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA	NA
Flow, Maximum during 24 hr period	gpd	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	16,000	NA
Flow, Day of Sampling	gpd	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	16,000	NA
Lead, Total	mg/L	0.43	0.69	NA	0.1	0.5	0.75	0.43	0.68	NA	NA	NA	0.5
Nickel, Total	mg/L	2.38	3.98	NA	1.0	2.0	3.0	2.36	3.94	NA	0.4	0.6	0.9
Oil & Grease, Non-polar Material	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
pH, Day of Sampling	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.0-10.0
pH, Minimum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.0
pH, Maximum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	10.0
Phosphorus, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Silver, Total	mg/L	0.24	0.43	NA	0.1	0.5	0.75	0.24	0.43	NA	NA	NA	0.43
Suspended Solids, Total (“TSS”)	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
Toxic Organics, Total (“TTO”)	mg/L	NA	2.13	NA	NA	NA	NA	NA	2.11	NA	NA	NA	2.11
Zinc, Total	mg/L	1.48	2.61	NA	1.0	2.0	3.0	1.47	2.59	NA	0.47	0.72	1.08

Note: See **Attachment C** for the combined waste stream formula (“CWF”) calculations used to adjust limits in 40 CFR 433.17 to account for non-categorical wastewaters (boiler blowdown and floor washing) in accordance with 40 CFR 403.6(e).

If “----” is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”).

The following table provides the sampling frequency and additional information regarding the pollutant of concern.

Sample Type	Sample Frequency	Parameter	Comment
Daily Composite Sample RCSA 22a-430-3(j)(7)	Monthly RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	Aluminum, Total	Present in effluent data. Source: metal alloys used in production process
		Chromium, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		Copper, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		Nickel, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		TSS	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
		Zinc, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
	Quarterly	Phosphorus	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)) Monitoring only requirement to assist POTW in tracking influent phosphorus concentrations
	Semi-Annually	Cadmium, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e))
		Lead, Total	Monitoring is required by 40 CFR 433.17. Monitoring frequency retained using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Silver, Total		Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years. (40 CFR 403.12(e)(1))	
Grab Sample Average RCSA 22a-430-4(c)(20)	Semi-Annually	Cyanide, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e)(1))
		Oil & Grease, Non-polar Material	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Grab Sample 40 CFR 403.12(g)(3)	Semi-Annually 40 CFR 403.12(e)(1)	Total Toxic Organics	Operating under approved SMP

DSN 202

Parameter	Units	40 CFR 433.17			RCSA Section 22a-430-4(s)(2)			BPJ		
		Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Cadmium, Total	mg/L	0.07	0.11	NA	0.07	0.11	0.75	NA	NA	0.11
Chromium, Total	mg/L	1.71	2.77	NA	1.0	2.0	3.0	NA	NA	NA
Copper, Total	mg/L	2.07	3.38	NA	1.0	2.0	3.0	0.54	0.73	1.09
Cyanide, Total	mg/L	0.65	1.20	NA	0.65	1.2	NA	NA	NA	1.2
Flow Rate, Average Daily	gpd	NA	NA	NA	NA	NA	NA	----	NA	NA
Flow, Maximum during 24 hr period	gpd	NA	NA	NA	NA	NA	NA	NA	4,000	NA
Flow, Day of Sampling	gpd	NA	NA	NA	NA	NA	NA	NA	4,000	NA
Fluoride	mg/L	NA	NA	NA	20.0	30.0	45.0	NA	NA	NA
Lead, Total	mg/L	0.43	0.69	NA	0.1	0.5	0.75	NA	NA	0.5
Nickel, Total	mg/L	2.38	3.98	NA	1.0	2.0	3.0	0.63	0.85	1.28
Nitrogen, Nitrate (Total as N)	mg/L	NA	NA	NA	NA	NA	NA	----	----	NA
Oil & Grease, Non-polar Material	mg/L	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
pH, Day of Sampling	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	6.0-10.0
pH, Minimum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	6.0
pH, Maximum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	10.0
Phosphorus, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	----	NA
Silver, Total	mg/L	0.24	0.43	NA	0.1	0.5	0.75	NA	NA	0.43
Suspended Solids, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
Toxic Organics, Total	mg/L	NA	2.13	NA	NA	NA	NA	NA	NA	2.13
Zinc, Total	mg/L	1.48	2.61	NA	1.0	2.0	3.0	0.47	0.72	1.08

Note: If "----" is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

The following table provides the sampling frequency and additional information regarding the pollutant of concern.

Sample Type	Sample Frequency	Parameter	Comment
Composite Sample RCSA 22a-430-3(j)(7)	Monthly RCSA 22a-430-3	Chromium, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		Copper, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		Fluoride	Source: brightening process
		Nickel, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		TSS	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
		Zinc, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
	Quarterly RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	Phosphorus, Total	Monitoring only requirement to assist POTW in tracking influent phosphorus concentrations
		Nitrogen, Nitrate	Monitoring only requirement to assist POTW in tracking influent nitrogen concentrations
	Semi-Annually	Cadmium, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e)(1))
		Lead, Total	Monitoring is required by 40 CFR 433.17. Monitoring frequency retained using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Silver, Total		Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years	
Grab Sample Average RCSA 22a-430-4(c)(20)	Semi-Annually	Cyanide, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e)(1))
		Oil & Grease, Non-polar Material	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Grab Sample 40 CFR 403.12(g)(3)	Semi-Annually 40 CFR 403.12(e)(1)	Total Toxic Organics	Operating under approved SMP

5.2 Permit Limit Development

Aluminum, Total:

DSN 201—There are no applicable limits for aluminum found in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Aluminum is detected in the discharge due to its presence in the metal alloys used in the production process.

Cadmium, Total:

DSN 201—Using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)), the maximum instantaneous limit ("MIL") was carried over from the maximum instantaneous limit ("MDL") because variability is not expected in the discharge.

DSN 202—Using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)), the instantaneous limit was carried over from the MDL because variability is not expected in the discharge.

Chromium, Total:

DSN 201— The monthly monitoring frequency will be retained using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m).

DSN 202—The monthly monitoring frequency will be retained using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m).

Copper, Total:

DSN 201—The existing copper limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSCA Section 22a-430-4(1)(4)(D)(vi). The monthly monitoring frequency will be retained using BPJ in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m).

DSN 202— The existing copper limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSCA Section 22a-430-4(1)(4)(D)(vi). The monthly monitoring frequency will be retained using BPJ since copper is expected present in the discharge in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m).

Cyanide, Total:

DSN 201—The AML and MDL in 40 CFR 433.17 adjusted by the CWF will be used because they are more stringent than the limits in RCSCA Section 22a-430-4(s)(2). Using BPJ (RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the MIL was carried over from the MDL because variability is not expected in the discharge.

DSN 202—Using BPJ (RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the MIL was carried over from the MDL because variability is not expected in the discharge.

Flow:

DSN 201—Click Bond has requested to reduce the maximum daily flow for this discharge from 34,000 gpd to 16,000 gpd.

DSN 202—No changes in flow have been requested.

Fluoride:

DSN 202—Limits from RCSCA Section 22a-430-4(s)(2) have been incorporated into the permit. Using a BPJ determination, in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m), a monthly monitoring requirement will be used in order to align with the monitoring frequencies of other pollutants expected present in the discharge.

Lead, Total:

DSN 201—The limits for lead found in RCSCA Section 22a-430-4(s)(2) will be used for the permit because they are more stringent than those found in 40 CFR 433.17 adjusted by the CWF. Using BPJ in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m), the semi-annual monitoring frequency will be retained, the minimum monitoring frequency allowed by 40 CFR 403.12(e)(1). Additionally, the MIL was carried over from the MDL because variability is not expected in the discharge.

DSN 202—Using BPJ in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m), the semi-annual monitoring frequency will be retained, the minimum monitoring frequency allowed by 40 CFR 403.12(e)(1). Additionally, the MIL was carried over from the MDL because variability is not expected in the discharge.

Nickel, Total:

DSN 201 & DSN 202—The existing nickel limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSCA Section 22a-430-4(1)(4)(D)(vi). The monthly monitoring frequency will be retained

using BPJ in accordance with RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m).

Nitrogen, Nitrate:

DSN 202—Although there are no applicable limits for nitrogen found in 40 CFR 433.17 or RCSA Section 22a-430-4(s), monitoring for nitrate will be maintained from the previous permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(1)(4)(D)(vi). A quarterly monitoring only requirement will be implemented into the permit to assist the POTW in tracking influent nitrogen concentrations. This determination was made using BPJ (RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)).

Oil & Grease, Non-polar Material:

DSN 201 & DSN 202—Based on the recommended maximum limit of 100 mg/L of oil and grease of petroleum and mineral origins, as described in “Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works”, USEPA, 1975-628-875, the MDL of 100.0 mg/L, and maximum instantaneous limit (“MIL”) of 150.0 mg/L for oil & grease, non-polar material, have been incorporated into this permit. Oils and grease are present in the discharges in levels an order of magnitude below the permitted limit, therefore monitoring will be required semi-annually.

Phosphorus, Total:

DSN 201— The monitoring frequency for phosphorus has been increased from semi-annually to quarterly for DSN 201 to align monitoring frequencies for the parameter across both DSNs.

DSN 202—The quarterly monitoring requirement for phosphorus will be retained for this permit cycle to assist the POTW in tracking influent phosphorus concentrations.

pH:

DSN 201 & DSN 202—The permitted pH range of 6.0-10.0 is considered to be protective of the sanitary sewer.

Silver, Total:

DSN 201—The limits for silver in 40 CFR 433.17 adjusted by the CWF and Section 22a-430-4(s) of the RCSA were compared. The AML from Section 22a-430-4(s) of the RCSA and the MDL from 40 CFR 433.17 were utilized as the most stringent limits. Using BPJ (RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the instantaneous limit was carried over from the MDL because variability is not expected in the discharge.

DSN 202—The most stringent limits from 40 CFR 433.17 (MDL), and RCSA 22a-430-4(s)(2) (AML), and previously existing permit limits (MIL) were incorporated into the permit. Using BPJ (RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the instantaneous limit was carried over from the MDL because variability is not expected in the discharge.

Total Suspended Solids:

DSN 201 & DSN 202—The existing TSS limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(1)(4)(D)(vi). Using BPJ in accordance with RCSA Sections 22a-430-

4(l)(4)(D)(iii) and 22a-430-4(m), the monthly monitoring for this parameter will be retained in order to ensure continued compliance with the effluent limit.

Total Toxic Organics:

DSN 201 & DSN 202—Click Bond, Inc. operates under an approved Solvent Management Plan. The Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan.

DSN 201—The MIL found in 40 CFR 433.17 was adjusted using the CWF to account for non-categorical wastewater in the discharge.

Zinc, Total:

DSN 201—The existing zinc limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(l)(4)(D)(vi). The monthly monitoring frequency will be retained using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m).

DSN 202—The existing zinc limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(l)(4)(D)(vi). Using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m), the monitoring frequency will be increased from semi-annually to monthly to remain consistent between discharges.

Sample Type:

DSN 202 — Compliance of all parameters other than total cyanide, pH, oil & grease (non-polar material), and TTOs will be monitored using a composite sample consisting of the first 10%, middle 10%, and last 10% of the discharge because the discharge is not sampled using an autosampler and the flowrate is assumed to be constant for the duration of the batch discharge.

SECTION 6.0 E-REPORTING

The Permittee and/or the Signatory Authority shall electronically submit 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 no later than the last day of the month following the required sampling 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. 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>.

SECTION 7.0 PUBLIC PARTICIPATION PROCEDURES

INFORMATION REQUESTS

The application has been assigned the following numbers by the Department of Energy and

Environmental Protection. Please use these numbers when corresponding with this office regarding this application.

APPLICATION NO. 201909570

PERMIT ID NO. SP0000920

Interested persons may obtain copies of the application from:

Laurie Shakley
Click Bond, Inc.

18 Park Road
Watertown, CT 06795
(860) 274-5435

Laurie.Shakley@clickbond.com

The application is available for inspection by contacting Seth Jones at seth.jones@ct.gov.

Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

PUBLIC COMMENT

Prior to making a final decision to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within 30 days of this public notice. Written comments should be directed to Seth Jones, seth.jones@ct.gov or 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 persons. Notice of any public hearing shall be published at least 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 signed petitions may be scanned and sent electronically to deep.adjudications@ct.gov or may be mailed or delivered to: DEEP Office of Adjudications, 79 Elm Street, 3rd floor, Hartford, 06106-5127.

All petitions must be received within the comment period noted above. If submitted electronically, original signed petitions must also be mailed or delivered to the address above within ten days of electronic submittal. If a hearing is held, timely notice of such hearing will be published in a newspaper of general circulation. For additional information go to www.ct.gov/deep/adjudications.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act (ADA). If you are seeking a communication aid or service, have limited proficiency in English, wish to file an ADA or Title VI discrimination complaint, or require some other accommodation, including equipment to facilitate virtual

participation, please contact the DEEP Office of Diversity and Equity at 860-418-5910 or by email at deep.accommodations@ct.gov. Any person needing an accommodation for hearing impairment may call the State of Connecticut relay number - 711. In order to facilitate efforts to provide accommodation, please request all accommodations as soon as possible following notice of any agency hearing, meeting, program, or event.

DRAFT

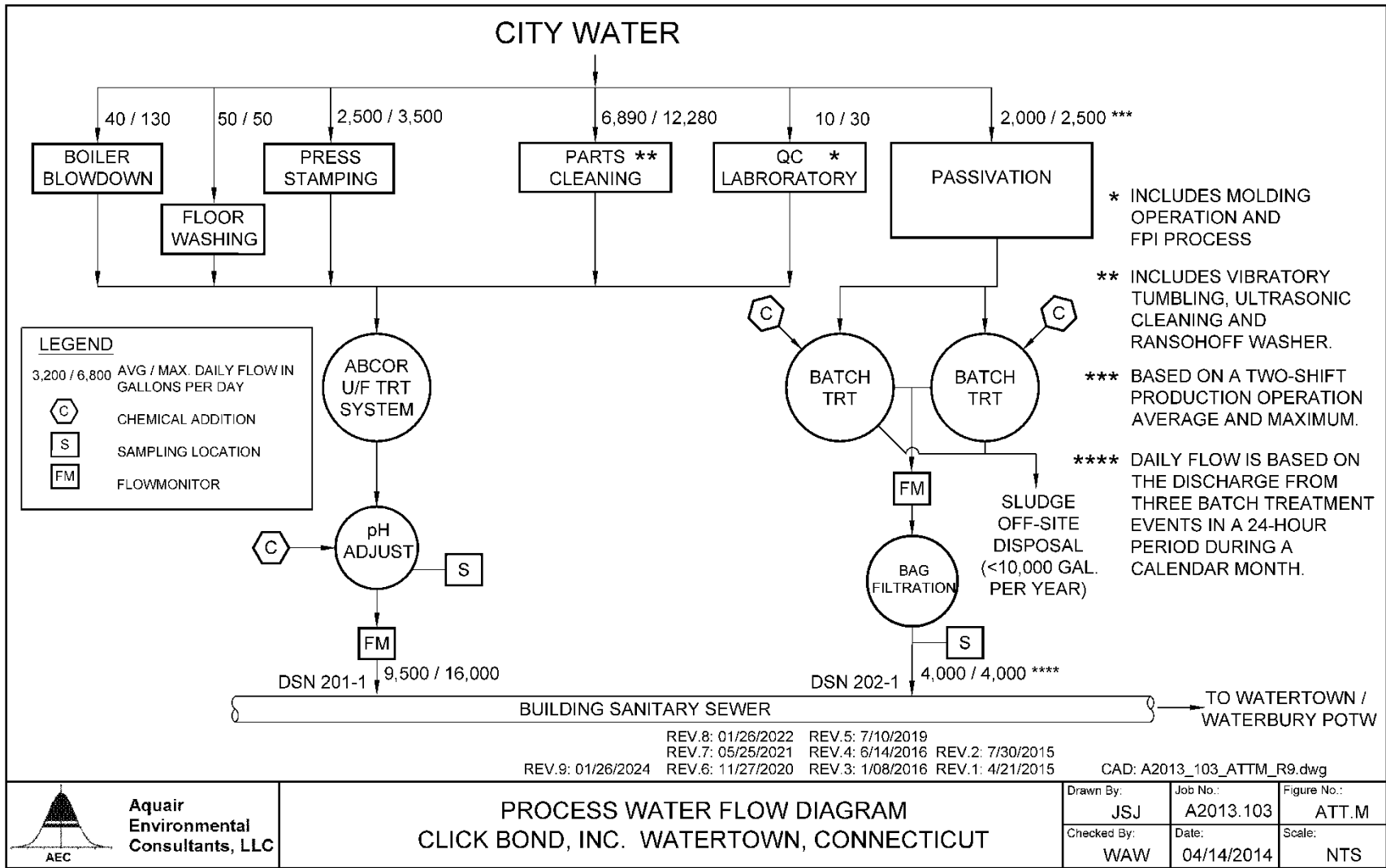
Attachment A: Click Bond 5 Year Effluent Violations Report (2018-2023)

Violation report pulled from Integrated Compliance Information System ("ICIS") on January 31, 2024.

DSN 2021

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
11/30/2021	Nickel, total [as Ni]	DAILY MX	0.8500	1.5800	mg/L
11/30/2021	Nickel, total [as Ni]	MO AVG	0.6300	1.1080	mg/L

DRAFT



* INCLUDES MOLDING OPERATION AND FPI PROCESS

** INCLUDES VIBRATORY TUMBLING, ULTRASONIC CLEANING AND RANSOHOFF WASHER.

*** BASED ON A TWO-SHIFT PRODUCTION OPERATION AVERAGE AND MAXIMUM.

**** DAILY FLOW IS BASED ON THE DISCHARGE FROM THREE BATCH TREATMENT EVENTS IN A 24-HOUR PERIOD DURING A CALENDAR MONTH.

SLUDGE OFF-SITE DISPOSAL (<10,000 GAL. PER YEAR)

Attachment C: Combined Waste Stream Formula Calculation for DSN 201

Click Bond DSN 201 CWF		
Waste Stream	Regulated/Non-regulated Flow (gpd)	Dilute Flow, F_D (gpd)
Parts Cleaning (40 CFR 433.17)	6,890	
Press Stamping (40 CFR 433.17)	2,500	
Boiler Blowdown (dilute)		40
Floor Washing (dilute)		50
QC Lab Testing (40 CFR 433.17)	10	
Total Flow, F_T (gpd)	9,490	
Dilution Factor = $(F_T - F_D)/F_T$	0.991	

The Combined Waste Stream Formula (“CWF”) accounts for the comingling of process and non-process wastewater prior to the sampling location in accordance with 40 CFR 403.6(e). The CWF is based on average flow values for each waste stream as provided in the permit applications.



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

1.0 TENTATIVE DETERMINATION

The Commissioner of Energy and Environmental Protection (“the Commissioner”) hereby gives notice of a tentative determination to renew a permit based on an application submitted by **Click Bond, Inc.** (“the applicant”) under Section 22a-430 of the Connecticut General Statutes (“CGS”) 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 determination that continuance of the existing system to treat the discharge would protect the waters of the state from pollution.

The Commissioner proposes to renew a permit for the discharge to the sanitary sewer.

The proposed permit, if issued by the Commissioner, will require that all wastewaters be treated to meet the applicable effluent limitations.

2.0 APPLICANT'S PROPOSAL

Click Bond, Inc. presently discharges a maximum of 20,000 gallons per day of treated wastewater to the Waterbury Water Pollution Control Facility (“WPCF”) via the Town of Watertown’s collection system from metal finishing operations at a metal stamping production facility.

The name and mailing address of the permit applicant are:

Click Bond, Inc.
18 Park Road
Watertown, CT 06795

The activity takes place at:

18 Park Road
Watertown, CT 06795

3.0 REGULATORY CONDITIONS

Type of Treatment

DSN 201: Ultrafiltration, pH adjustment

DSN 202: Coagulation, flocculation, solids settling and filtration, pH adjustment

Effluent Limitations

This permit contains effluent limitations consistent with a Case-by-Case Determination using the criteria of Best Professional Judgement, Pretreatment Standards for New Sources (PSNS) under 40 CFR 433.17, and Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”) and will protect the waters of the state from pollution when all of the conditions of this permit have been met.

In accordance with Section 22a-430-4(1) of the RCSA, the permit contains effluent monitoring/limitations for heavy metals, cyanides, priority pollutants, total toxic organics, oil and grease (non-polar material), conventional pollutants, and pH.

Compliance Schedule

This permit contains an enforceable compliance schedule which requires the applicant to develop and implement a per- and polyfluoroalkyl substances (PFAS) sampling plan for its discharge.

4.0 COMMISSIONER'S AUTHORITY

The Commissioner is authorized to approve or deny such permits pursuant to Section 22a-430 of the CGS and the Water Discharge Permit Regulations (Sections 22a-430-3 and 4 of the RCSA).

5.0 INFORMATION REQUESTS

The application has been assigned the following numbers by the Department of Energy and Environmental Protection. Please use these numbers when corresponding with this office regarding this application.

APPLICATION NO. 201909570 PERMIT ID NO. SP0000920

Interested persons may obtain copies of the application from:

Laurie Shakley
Click Bond, Inc.

18 Park Road
Watertown, CT 06795
(860) 274-5435

The application is available for inspection by contacting Seth Jones via phone at (860) 424-3049 and via email at seth.jones@ct.gov at the Water Permitting and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, from 8:30 - 4:30, Monday through Friday.

Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

6.0 PUBLIC COMMENT

Prior to making a final determination to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within thirty (30) days of this public notice. Written comments should be directed to Seth Jones, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106 5127 or seth.jones@ct.gov. 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.

7.0 PETITIONS FOR HEARING

Petitions for a hearing shall be submitted within thirty (30) days from the date of publication of this public notice and should include the application number noted above and also identify a contact person to receive notifications. Petitions should also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. The Office of Adjudications will accept electronically-filed petitions for hearing in addition to those submitted by mail or hand-delivered. Petitions with required signatures may be sent to deep.adjudications@ct.gov; those mailed or delivered should go to the DEEP Office of Adjudications, 79 Elm Street, Hartford, CT 06106. If the signed original petition is only in an electronic format, the petition must be submitted with a statement signed by the petitioner that the petition exists only in that form. Original petitions that were filed electronically must also be mailed or delivered to the Office of Adjudications within 30 days of electronic submittal. Additional information at www.ct.gov/deep/adjudications.

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Audra Dickson
Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance

Dated: August 14, 2024