

PRETREATMENT PERMIT

issued to

UniFirst Corporation
205 Garfield Avenue
Stratford, CT 06615

Location Address:
205 Garfield Avenue
Stratford, CT

Permit ID: SP0001109

Permit Expires: February 27, 2019

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 ("EPA") which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.
- (B) UniFirst 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, penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars 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.
- "Grab Sample Average ("GSA")" means the arithmetic average of all grab sample analyses. Grab samples shall be collected just prior to discharge from each tank over a full operating day for as long as a discharge exists on that day (minimum of two grab samples 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.

"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 DECISION

- (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 decision is based on Application No. 201206454 for permit reissuance received on October 3, 2012 and the administrative record established in the processing of that application.
- (B)
 - (1) From the issuance of this permit through and including February 28, 2014, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0001109, issued by the Commissioner to the Permittee on April 3, 2008, the previous application submitted by the Permittee on January 31, 2002, 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. SP0001109, issued by the Commissioner to the Permittee on April 3, 2008.
 - (2) From March 1, 2014 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. SP0001109, issued by the Commissioner to the Permittee on February 28, 2014, Application No. SP0001109 received by the Department on October 3, 2012, 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. SP0001109, issued by the Commissioner to the Permittee on February 28, 2014.
- (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 discharge shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A								
Discharge Serial Number: 201-1						Monitoring Location: 1		
Wastewater Description: Industrial laundry wastewater								
Monitoring Location Description: Treatment system effluent								
Discharge is to: The City of Stratford Publicly Owned Treatment Works								
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 ²	Sample Type or measurement to be reported
Biochemical Oxygen Demand (BOD ₅)	mg/l	NA	----	Monthly	Daily Composite	NA	NR	NA
Cadmium, Total	mg/l	0.1	0.5	Quarterly	Daily Composite	0.75	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Quarterly	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	126,000	NA	Daily	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	157,000	Daily	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	157,000	Monthly	Daily Flow	NA	NR	NA
Lead, Total	mg/l	0.5	1.0	Monthly	Daily Composite	1.5	NR	Grab
Oil Petroleum, Total Recoverable	mg/l	50.0	100.0	Monthly	GSA	150.0	NR	Grab
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuously	Continuously
pH, Maximum	S.U.	NA	NA	NR	NA	11.0	Continuously	Continuously
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-11.0	Monthly	RDS
Total Suspended Solids	mg/l	NA	350	Monthly	Daily Composite	525	NR	Grab
Total Purgeable Organics, EPA Method 624	mg/l	NA	2.13	Monthly	GSA	3.2	NR	Grab
Zinc, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	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 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 frequently, 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.

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 address below. 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 for submittal 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 DMRs ("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 City of Stratford Publicly Owned Treatment Works ("POTW"), which is involved in the collection and treatment of the permitted discharge.

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 City of Stratford POTW of all discharges that could cause problems to the POTW, including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, 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 (6) 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 (6) 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 six (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 a violation of BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on **2/28/14**

/s/Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

MM/MVM

cc: The City of Stratford POTW

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: UniFirst Corporation

PERMIT, ADDRESS, AND FACILITY DATA

Application No.: 201206454

Permit No.: SP0001109

<u>Mailing Address:</u> Street: 205 Garfield Avenue City: Stratford ST: CT Zip: 06615 Contact Name: Robert Toshev Phone No.: 203.375.5831 Email: Robert_Toshev@unifirst.com	<u>Location Address:</u> Street: 205 Garfield Avenue City: Stratford ST: CT Zip: 06615 DMR Contact Robert Toshev Phone No.: 203.375.5831 Email: Robert_Toshev@unifirst.com
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Permit Information

Duration 5 Year X 10 Year ____ 30 Year ____
Type New ____ Reissuance X Modification ____
Categorization Point Source (X) Non-point Source () GIS # ____
NPDES () Pretreatment (X) Groundwater (UIC) () Groundwater (Other) ()
NPDES Major (MA) ____
NPDES Significant Minor or Pretreatment SIU (SI) X
NPDES or Pretreatment Minor (MI) ____
Pretreatment Significant Industrial User (SIU) X
Pretreatment Categorical (CIU) ____
Pollution Prevention Mandate ____ Environmental Equity Issue ____

Standard Industrial Classification ("SIC") Code: 7218 – Industrial Launderers

Compliance Issues

Compliance Schedule Yes ____ No X
Is the permittee subject to a pending enforcement action? No X Yes ____

Ownership Code

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

DEEP Staff Engineer Mariana Miller

Permit Fees

Discharge Code	DSN Number	Annual Fee
515007b	001-1	\$8,425.00

For Sewer Discharges

Discharge to the City of Stratford POTW. The facility I.D. number of the POTW is 138-001.

Nature of Business Generating Discharge

UniFirst Corporation is an industrial laundry. Workplace uniforms, shop towels, mats, mops, and other accessory textile items are rented and laundered.

Process and Treatment Description (by DSN)

DSN 201-1: Lint removal, neutralization, dissolved air floatation ("DAF"), and sludge dewatering.

Resources Used to Draft Permit

- ☐ Federal Effluent Limitation Guideline
- ☐ Performance Standards
- ☒ Federal Development Document Industrial Laundries Point Source Category Development Document
- ☐ Treatability Manual
- ☒ Department File Information
- ☐ Connecticut Water Quality Standards
- ☐ Anti-degradation Policy
- ☐ Coastal Management Consistency Review Form
- ☐ Other - Explain

Basis for Limitations, Standards or Conditions

- ☒ Case-by-Case Determination using Best Professional Judgment (See *Other Comments*)
 - All parameters.

Other Comments

EPA has not established national categorical pretreatment standards for the Industrial Laundry Point Source Category because the discharges to POTWs from facilities classified under this category are not a problem warranting national regulation. For this reason, the permit limits were determined on a case-by-case basis using best professional judgment.

The parameter identified as *Oil and Grease, Hydrocarbon Fraction* from the previous permit is now *Oil Petroleum, Total Recoverable*. The average monthly, maximum daily and maximum instantaneous limits were carried over from the previous permit.

A review of UniFirst Corporation's effluent performance data from 2010 to the present revealed that the company can meet the limits from the previous permit. Therefore, all previous permit limits have been incorporated into this renewal.

The above-referenced effluent performance data also shows that there has been very minimal to zero concentrations of cadmium and chromium in the discharge. Because of this, the monitoring frequencies for both parameters have been reduced from monthly to quarterly.

Previously, UniFirst Corporation discharged from two outfalls, DSN 201-1 and DSN 202-1. UniFirst expressed a desire to install a single stream wastewater treatment system to treat all industrial laundry wastewaters generated at the facility. UniFirst combined the two discharges and started discharging through the single stream wastewater treatment system on February 3, 2009. Monitoring table C of the previous permit also went into effect on this date and has been incorporated into this permit renewal.

The City of Stratford POTW confirmed its approval with the permit conditions on January 2, 2014.

The public notice was published in the CT Post on January 16, 2014. The Department has received no written comments on the proposed action.