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Affirmative Action/Equal Opportunity Employer

PRETREATMENT PERMIT

issued to

Consolidated Industries Acquisition Corporation
677 Mixville Road
Cheshire, CT 06410

Location Address:

677 Mixville Road
Cheshire, CT 06410

Permit ID: SP0002317

Permit Expires: August 6, 2018

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 (MOA) dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.
- (B) Consolidated Industries Acquisition 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 subsection (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

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

Section 22a-430-4 Procedures and Criteria

- (a) Duty to Apply
- (b) Duty to Reapply
- (c) Application Requirements
- (d) Preliminary Review
- (e) Tentative Determination

- (f) Draft Permits, Fact Sheets
 - (g) Public Notice, Notice of Hearing
 - (h) Public Comments
 - (i) Final Determination
 - (j) Public Hearings
 - (k) Submission of Plans and Specifications. Approval.
 - (l) Establishing Effluent Limitations and Conditions
 - (m) Case by Case Determinations
 - (n) Permit issuance or renewal
 - (o) Permit Transfer
 - (p) Permit revocation, denial or modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements for Metals and Cyanide
 - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars 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 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 Regulations of Connecticut State Agencies.

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 section 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 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.

"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.

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

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

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

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

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

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

"µg/l" means micrograms per liter.

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 decision is based on Application No. 201001370 for permit reissuance received on March 16, 2010 and the administrative record established in the processing of that application.
- (B)
 - (1) From the issuance of this permit through and including August 31, 2013, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002317, issued by the Commissioner to the Permittee on September 14, 2005, the previous application submitted by the Permittee on October 15, 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. SP0002317, issued by the Commissioner to the Permittee on September 14, 2005.
 - (2) From September 1, 2013 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. SP0002317, issued by the Commissioner to the Permittee on August 7, 2013, Application No. 201001370 received by the Department on March 16, 2010, 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. SP0002317, issued by the Commissioner to the Permittee on August 7, 2013.
- (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 Connecticut General Statutes 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 Connecticut General Statutes 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 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: Passivation, alkaline cleaning, tumbling, etching, fluorescent penetrant inspection, ultrasonic examination, QC laboratory and annealing quench wastewaters and rinsewaters from RO filtration								
Monitoring Location Description: In the weir after sand filtration								
Discharge is to: The Town of Cheshire Water Pollution Control Facility								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency ²	Sample Type or measurement to be reported
Cadmium, Total	mg/l	0.1	0.5	Semi-annual	Daily Composite	0.75	NR	NA
Chromium, Total	mg/l	1.0	2.0	Semi-annual	Daily Composite	3.0	NR	NA
Copper, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	NA
Cyanide, Total	mg/l	0.65	1.2	Semi-annual	Grab Sample Average	1.8	NR	NA
Flow, (Day of Sampling) ¹	gpd	NA	25,000	Weekly	Total Daily Flow	NA	NR	NA
Flow, Maximum during a 24 hour period ¹	gpd	NA	25,000	Daily	Total Daily Flow	NA	NR	NA
Fluoride, Total	mg/l	20.0	30.0	Weekly	Daily Composite	45.0	NR	NA
Lead, Total	mg/l	0.1	0.5	Twice per month	Daily Composite	0.75	NR	NA
Nickel, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	NA
Oil petroleum, total recoverable	mg/l	50	100	Weekly	Grab Sample Average	150	NR	NA
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 - 10.0	Weekly	RDS
pH, Minimum ³	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous
pH, Maximum ³	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
Silver, Total	mg/l	0.1	0.43	Semi-annual	Daily Composite	0.64	NR	NA
Total Suspended Solids	mg/l	----	----	Weekly	Daily Composite	NA	NR	NA
Total Toxic Organics ⁴	mg/l	NA	NA	NR	NA	1.42	Monthly	Grab
Zinc, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	NA

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 Maximum Daily Flow for each sampling month.

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

³ For this parameter, the Permittee shall maintain at the facility a record of the continuous pH for each day of discharge and shall report the minimum and the maximum pH for each sampling month.

⁴ See section 5, paragraph G.

- (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 Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance at the following address. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at this address by the last day of the month following the month in which samples are taken.

Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division (Attn: DMR Processing)
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, 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.
- (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 discharge monitoring reports (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 discharge monitoring reports ("Signatory Authority") as described in

RCSA Section 22a-430-3(b)(2) shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of Discharge Monitoring Report (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 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 to the Department no later than the 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 a 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 local Water Pollution Control Authority(ies) ("WPCA") involved in the treatment and collection of the permitted discharge.
- (G) For Total Toxic Organics (TTO) monitoring, in accordance with 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. 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) 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 (Attn: DMR Processing) within 30 days of the exceedance.
- (B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("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 1(B) 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 Bureau of Materials Management and Compliance Assurance within 24 hours of becoming aware of the violation.

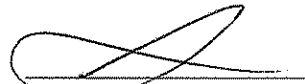
SECTION 7: COMPLIANCE CONDITIONS

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 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 45 days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within 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

8/7/13



Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

cc: Town of Cheshire Water Pollution Control Facility

WASTEWATER DISCHARGE PERMIT: DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Consolidated Industries Acquisition Corporation

PERMIT, ADDRESS, AND FACILITY DATAPERMIT #: SP0002317APPLICATION #: 201001370

<u>Mailing Address:</u>						<u>Location Address:</u>					
Street:	677 Mixville Road					Street:	677 Mixville Road				
City:	Cheshire	ST:	CT	Zip:	06410	City:	Cheshire	ST:	CT	Zip:	06410
Contact Name:	Drew Papio					DMR Contact:	Salvatore Coppola				
Phone No.:	(203) 272-5371					Phone No.:	(203) 272-5371				
Contact E-mail:	DPapio@consolindustries.com					DMR Contact E-mail:	SCoppola@consolindustries.com				

PERMIT INFORMATIONDURATION 5 YEAR X 10 YEAR ____ 30 YEAR ____TYPE New ____ Reissuance X Modification ____

CATEGORIZATION POINT (X) NON-POINT () GIS #

NPDES () PRETREAT (X) GROUND WATER (UIC) () GROUND WATER (OTHER) ()

NPDES MAJOR (MA) ____
NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) X
NPDES or PRETREATMENT MINOR (MI) ____PRETREAT SIGNIFICANT INDUS USER (SIU) X
PRETREAT CATEGORICAL (CIU) XPOLLUTION PREVENTION MANDATE ____ ENVIRONMENTAL EQUITY ISSUE ____
SIC CODE 3312SOLVENT MANAGEMENT PLANIS THE FACILITY OPERATING UNDER AN APPROVED SOLVENT MANAGEMENT PLAN? Yes X No ____
Approved on May 14, 2013COMPLIANCE SCHEDULE YES ____ NO X

POLLUTION PREVENTION ____ TREATMENT REQUIREMENT ____ WATER CONSERVATION ____

WATER QUALITY REQUIREMENT ____ REMEDIATION ____ OTHER ____

RECENT ENFORCEMENT HISTORYIS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? YES X NO ____
(See Other Comments)OWNERSHIP CODEPrivate X Federal ____ State ____ Municipal (town only) ____ Other public ____DEEP STAFF ENGINEER Oluwatoyin Fakilede

PERMIT No. SP0002317

PERMIT FEES

<i>Discharge Code</i>	<i>DSN Number</i>	<i>Annual Fee</i>
501035Z	201-1	\$ 8425.00

FOR SEWER DISCHARGES

Discharge to the Town of Cheshire Water Pollution Control Facility via its collection system.

NATURE OF BUSINESS GENERATING DISCHARGE

Consolidated Industries Acquisition Corporation manufactures metal forgings of aluminum, magnesium, titanium, stainless steel and other iron alloys for the aerospace industry.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 201-1: This discharge is composed of a maximum flow of 25,000 gallons per day of passivation, alkaline cleaning, tumbling, etching, fluorescent penetrant inspection, ultrasonic examination, QC laboratory and annealing quench wastewaters and rinsewater from reverse osmosis filtration. The wastewaters undergo equalization, two stage pH adjustments, flocculation, clarification, filter press, final pH adjustment, sand filtration, sludge thickening and sludge removal prior to discharge to the sanitary sewer.

RESOURCES USED TO DRAFT PERMIT

- X Federal Effluent Limitation Guideline 40CFR 433 (Metal Finishing)
name of category
- Performance Standards
- Federal Development Document
name of category
- Treatability Manual
- X Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy
- Coastal Management Consistency Review Form
- X Other - Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- Pretreatment Standards for Existing Sources (PSES) (Permittee started operations before 1982)
Silver (MDL)
- Case by Case Determination using Best Professional Judgment (See Other Comments)
Cyanide (MIL), oil petroleum, total recoverable (AML, MDL, MIL), pH, minimum and maximum (MIL), silver (MIL) and total toxic organics (MIL)
- Section 22a-430-4(s) of the Regulations of Connecticut State Agencies
Cadmium (AML, MDL, MIL), chromium (AML, MDL, MIL), copper (AML, MDL, MIL), cyanide

(AML, MDL), fluoride (AML, MDL, MIL), lead (AML, MDL, MIL), nickel (AML, MDL, MIL), silver (AML) and zinc (AML, MDL, MIL).

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

GENERAL COMMENTS

Consolidated Industries Acquisition Corporation performs forging operations which would have typically made the facility an iron and steel manufacturing point source (EPA 40 CFR 420). However, these processes do not generate wastewaters but the etching process does. Therefore, the facility is categorized as a metal finishing facility and subject to metal finishing categorical limits.

In developing the permit's concentration limits, EPA Metal Finishing Categorical Limits (40 CFR Part 433) and Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies limits were compared. The Connecticut limits were found to be more stringent and thus incorporated in the permit with the exception of maximum daily limit for silver, which has a more stringent limit in 40 CFR 433.

Based on a case by case determination using the criteria of best professional judgment, maximum instantaneous limitations for total cyanide and silver were developed by multiplying the maximum daily limitations by a factor of 1.5, consistent with ratios used in Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies (RCSA).

Oil petroleum, total recoverable will be the permit parameter used in this permit, replacing oil and grease, hydrocarbon fraction used in the previous permit. Based on a Case by Case Determination using the criteria of Best Professional Judgment, the limits for oil petroleum, total recoverable are set using a report entitled "Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works", USEPA, Effluent Guidelines Division, EPA/440/1-75-066 (April 1975), and the medium strength concentration of oil and grease in typical domestic wastewaters (Metcalf & Eddy, Inc. (1991)) as guide. These limits are not expected to cause any problems in the sanitary sewer.

Based on a Case by Case Determination using the criteria of Best Professional Judgment, a limit was included for total toxic organics. This limit which is based on performance is consistent with the limit in the previous permit, in accordance with the anti-backsliding rule. Based on a review of the DMRs, the Permittee shouldn't have any problems meeting this limit.

The pH limits of 6.0 to 10.0 S.U. were incorporated in this permit because these limits are considered to be protective of sanitary sewer systems.

OTHER COMMENTS

During the last permit cycle, the Permittee self-reported several exceedances of effluent limitations from January 2008 through July 2011. The exceedances were mainly for fluoride. The Department of Energy and Environmental Protection (DEEP) issued three notices of violation NOV WR IN 09 027, NOV WR IN 10 004 and NOV WR IN 11 005 on June 15, 2009, January 22, 2010 and March 2, 2011 respectively. The Permittee responded to the notices of violation citing various root causes for the violations and corrective actions implemented. Most of the cited root causes were issues related to operation and maintenance of the wastewater treatment system or operator's error. The Department also issued a Consent Order No. CO WR IN 11 004 on February 16, 2012 to address the exceedances. The Permittee implemented some corrective measures, but had an exceedance in June 2012. The Department is working with the Permittee to achieve consistent compliance with the fluoride limits and the incidences of violation have reduced. The Department is currently reviewing the facility's handling of recent pH exceedances.

The Permittee generates a small amount of rinsewater from reverse osmosis filtration that is discharged into the wastewater treatment system. The Permittee also has an existing general permit for water production for deionized wastewater that does not include the rinsewater from reverse osmosis filtration. The rinsewater is only about 5 gpd which is 0.02% of the 25,000 gpd wastewater and was not considered to be a dilution. Therefore, dilution calculation in accordance with 40 CFR 403.6(e) was not performed. The Department also decided not to assess fee for the rinsewater from reverse osmosis filtration.

In a letter to the Department dated June 29, 2011, the Permittee described that non-contact cooling water associated with the hydrofluoric acid tanks is discharged to the pretreatment wastewater treatment system. Non-contact cooling water is not listed in the pretreatment permit and is not identified in its respective application. Thereafter, the Department had issued a consent order citing a violation of Section 22a-430 of the Connecticut General Statutes for discharging without a permit. The Department had required the Permittee to propose a system and/or equipment necessary to ensure that the non-contact cooling water surrounding the contents of the hydrofluoric acid tanks will not come in contact with the contents of such tanks or otherwise affect wastewaters discharged in accordance with pretreatment Permit No. SP0002317. The Permittee has now re-plumbed the non-contact cooling water to the cold water rinse tank where it is used as process water. Subsequently, the Permittee submitted new line diagrams showing the disposition of the non-contact cooling water. Therefore, this permit does not include non-contact cooling water because this water is recycled back into the rinse tanks and is considered to be process supply water. Also for the same reason, dilution calculation is not necessary.

In a letter dated March 16, 2010, the Permittee requested that the sampling frequency for copper, lead, nickel and zinc at DSN 201-1, be reduced from weekly to quarterly or semi-annually since historically, the concentration levels of these metals in the wastewater have been below detection. Although the concentration levels of these metals are below detection, Section 22a-430-3(j)(2) of the Regulations of Connecticut State Agencies (RCSA) prescribes a frequency of weekly monitoring for this discharge. However, in view of the fact that these metals have been below detection for the past years, the frequency of monitoring for these metals have been reduced and the permit will require twice per month monitoring for copper, lead, nickel and zinc.

After submitting a permit renewal application, the Permittee requested written approvals for several facility and treatment system modifications in accordance with Section 22a-430-3(i) of the Regulations of Connecticut State Agencies (RCSA). The following written approvals were issued by the department:

- 1) September 23, 2010:- Authorization to discharge effluent from ultrasonic examination bath, overflow from quench bath, rinsewater from fluorescent penetrant inspection (FPI), and rinsewater from acid etching at the Quality Control laboratory into the wastewater treatment system.*
- 2) September 14, 2012:- Authorization to install a Neptune Model JG-4 mixer in the existing hydrofluoric and nitric acids collection tank (T-5) located in Plant 3.*
- 3) December 14, 2012:- Authorization to install new chlorinated polyvinyl chloride liners in the existing hydrofluoric/ nitric acid process tanks and install a heat exchanger fluoropolymer coil in the hydrofluoric/ nitric acid tank.*

The draft permit was e-mailed to Mr. Dennis Dievert of the Town of Cheshire Water Pollution Control Facility (WPCF). The Town of Cheshire WPCF concurs with the terms and conditions of the draft permit.

The public notice for the proposed permit for Consolidated Industries, Inc. was published in the Hartford Courant on June 22, 2013. The Department has received no written comments on the proposed action. The name of the Permittee was incorrectly listed in the public notice. In the final permit, the name of the Permittee was changed from Consolidated Industries, Inc. as listed in the public noticed draft permit, to Consolidated Industries Acquisition Corporation, to reflect the correct business name of the Permittee. The Permittee also does business as Consolidated Industries, Inc. and that name was inadvertently included in the draft permit. A public notice is not required to make this modification in accordance with Section 22a-430-4(p)(5)(B) of The Regulations of Connecticut State Agencies.