

PRETREATMENT PERMIT MODIFICATION

issued to

Location Address:

GLOBAL STEERING SYSTEMS, LLC
156 Park Road
PO Box 210
Watertown, CT 06795

156 Park Road
Watertown, CT

Permit ID: SP0002182

Permit Expires: September 9, 2017

SECTION 1: GENERAL PROVISIONS

- (A) This permit modification is issued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403 (Title 40 of the Code of Federal Regulations, Part 403).
- (B) GLOBAL STEERING SYSTEMS, LLC, ("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 (\$25,000) may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above, the following definitions shall apply to this permit:
- "----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the discharge monitoring report ("DMR").
- "Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l). Otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.
- "Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.
- "Daily Quantity" means the quantity of waste generated during an operating day.
- "gpd" means gallons per day.
- "Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.
- "Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l). Otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum

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

"mg/l" means milligrams per liter.

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

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

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

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

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

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

"S.U." means Standard Units.

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

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. 201409436 for permit modification received on September 25, 2014 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT MODIFICATION], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002182, issued by the Commissioner to the Permittee on September 10, 2012, the previous application submitted by the Permittee on October 4, 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. SP0002182, issued by the Commissioner to the Permittee on September 10, 2012.
- (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT MODIFICATION] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002182, issued by the Commissioner to the Permittee on [DATE OF PERMIT MODIFICATION], Application No. 201409436 received by the Department on September 25, 2014, 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. SP0002182, issued by the Commissioner to the Permittee on [DATE OF PERMIT MODIFICATION].
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the 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 the specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the tables below.

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DURING THE PERIOD BEGINNING ON THE DATE OF PERMIT MODIFICATION THROUGH FIVE HUNDRED AND FORTY-FIVE (545) DAYS AFTER THE DATE OF PERMIT MODIFICATION, THE PERMITTEE SHALL COMPLY WITH TABLE A.

Table A								
Discharge Serial Number: 001-1					Monitoring Location: 1			
Wastewater Description: Metal Finishing Wastewater (acid phosphate coating, tumbling and cleaning) and pretreated mechanical product manufacturing wastewater (turning, broaching, wet blasting, parts washing, drilling, stamping, grinding), building maintenance wastewater, laboratory wastewater, air compressor condensate.								
Monitoring Location Description: Automatic sampler immediately following final pH adjustment tank.								
Discharge is to: The City of Waterbury Water Pollution Control Facility via the Town of Watertown municipal sewer system.								
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	0.07	0.11	Monthly	Daily Composite	0.165	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Copper, Total	mg/l	0.54	0.73	Monthly	Daily Composite	1.09	NR	Grab
Cyanide, Total	mg/l	0.65	1.2	Semi-Annually	Grab Sample Average	1.8	NR	Grab
Ethanolamine	mg/l	-----	-----	Semi-Annually	Daily Composite	NA	NR	Grab
Flow Rate (Average Daily) ¹	gpd	20,000	NA	Continuous	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	25,000	Continuous	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	-----	25,000	Monthly	Daily Flow	NA	NR	NA
Lead, Total	mg/l	0.1	0.5	Monthly	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	0.63	0.85	Monthly	Daily Composite	1.28	NR	Grab
Oil Petroleum, Total Recoverable	mg/l	50.0	100.0	Monthly	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	Continuous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
Phosphorus, Total (as P)	mg/l	-----	-----	Monthly	Daily Composite	-----	NR	Grab
Silver, Total	mg/l	0.1	0.43	Quarterly	Daily Composite	0.64	NR	Grab
Total Suspended Solids	mg/l	NA	-----	Monthly	Daily Composite	NA	NR	Grab
Total Toxic Organics ³	mg/l	NA	NA	NR	NA	2.13	Quarterly	Grab
Zinc, Total	mg/l	1.0	1.22	Monthly	Daily Composite	1.83	NR	Grab

Table Footnotes:

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 Refer to Section 5, Paragraph (G).

DURING THE PERIOD BEGINNING ON FIVE HUNDRED AND FORTY-SIX (546) DAYS AFTER THE DATE OF PERMIT MODIFICATION, THE PERMITTEE SHALL COMPLY WITH TABLE B. TABLE A IS NO LONGER APPLICABLE AFTER FIVE HUNDRED AND FORTY-SIX (546) DAYS AFTER THE DATE OF PERMIT MODIFICATION.

Table B								
Discharge Serial Number: 001-1					Monitoring Location: 1			
Wastewater Description: Metal Finishing Wastewater (acid phosphate coating, tumbling and cleaning) and pretreated mechanical product manufacturing wastewater (turning, broaching, wet blasting, parts washing, drilling, stamping, grinding), building maintenance wastewater, laboratory wastewater, air compressor condensate.								
Monitoring Location Description: Automatic sampler immediately following final pH adjustment tank.								
Discharge is to: The City of Waterbury Water Pollution Control Facility via the Town of Watertown municipal sewer system.								
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	0.07	0.11	Monthly	Daily Composite	0.165	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Copper, Total	mg/l	0.54	0.73	Monthly	Daily Composite	1.09	NR	Grab
Cyanide, Total	mg/l	0.65	1.2	Semi-Annually	Grab Sample Average	1.8	NR	Grab
Ethanolamine	mg/l	-----	-----	Semi-Annually	Daily Composite	NA	NR	Grab
Flow Rate (Average Daily) ¹	gpd	20,000	NA	Continuous	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	25,000	Continuous	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	-----	25,000	Monthly	Daily Flow	NA	NR	NA
Lead, Total	mg/l	0.1	0.5	Monthly	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	0.63	0.85	Monthly	Daily Composite	1.28	NR	Grab
Oil Petroleum, Total Recoverable	mg/l	50.0	100.0	Monthly	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	Continuous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
Phosphorus, Total (as P)	mg/l	-----	-----	Monthly	Daily Composite	-----	NR	Grab
Silver, Total	mg/l	0.1	0.43	Quarterly	Daily Composite	0.64	NR	Grab
Total Suspended Solids	mg/l	NA	-----	Monthly	Daily Composite	NA	NR	Grab
Total Toxic Organics ³	mg/l	NA	NA	NR	NA	2.13	Quarterly	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 Refer to 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 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 discharge monitoring reports ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of DMR information. Information on NetDMR is available on the Department's website at www.ct.gov/deep/netdmr. On or before ninety (90) days after issuance of this permit, the Permittee shall submit a signed and notarized copy of the **Connecticut DEEP NetDMR Subscriber Agreement** to the Department.

b. Submittal of Reports Using NetDMR

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

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

c. Submittal of NetDMR Opt-Out Requests

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

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

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

- (F) Copies of all DMRs shall be submitted concurrently to the Waterbury Publicly Owned Treatment Works ("POTW") and the Watertown Public Works Department ("PWD").
- (G) For Total Toxic Organics (TTO) monitoring, in accordance with section 22a-430-4(l) of the RCSA and 40 CFR 433 (Metal Finishing Point Source Category), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. This certification statement shall be as follows:

"Based on my inquiry of the person or persons 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 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, the Waterbury POTW and the Watertown PWD 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 SCHEDULE

- (A) On or before two hundred and seventy (270) days after the date of issuance of this permit, the Permittee shall submit to the Commissioner a status report describing measures to be implemented to ensure that the Permittee will meet the limits for total zinc for DSN 001-1 which will become effective five hundred and forty-six (546) days after permit modification. Measures to be evaluated shall include, but not be limited to process changes, chemical substitution and modification of the existing wastewater treatment system.
- (B) 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:

Ewa Wozniak, Sanitary Engineer
Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

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, 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 biological oxygen demand, total suspended solids or fats, oil and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.

- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **Best Management Practices ("BMPs"):** Any other violation or group of violations, which may include failure to implement and follow BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit modification is hereby issued on

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Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

MM/EMW

cc: Waterbury POTW
Watertown PWD

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0002182

APPLICATION #: 201409436

PERMIT INFORMATION

SOLVENT MANAGEMENT PLAN

COMPLIANCE ISSUES

RECENT ENFORCEMENT HISTORY

Is the Permittee subject to a pending enforcement action? Yes ☐ No ☒

OWNERSHIP CODE

Private ☒ Federal ☐ State ☐ Municipal (town only) ☐ Other public

DEEP STAFF ENGINEER Ewa Wozniak

PERMIT FEES

Discharge Code	DSN Number	Annual Fee
501035Y	001-1	\$4,337.50

FOR SEWER DISCHARGES

Discharge is to the City of Waterbury POTW via the Town of Watertown collection system. The facility ID. of the POTW is 151-001.

NATURE OF BUSINESS GENERATING DISCHARGE

Global Steering Systems, LLC manufactures steering columns and intermediate shafts for the automotive industry. Manufacturing processes include phosphate coating, stamping, machining, powder coating, forming, cleaning, tumbling, cutting, drilling, and welding and assembly.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: This continuous discharge is made up of a maximum of 25,000 gallons per day of metal finishing wastewaters from an acid phosphate coating process, tumbling and cleaning, and pretreated mechanical product manufacturing wastewater from turning, broaching, wet blasting, parts washing, drilling, stamping and grinding of metal parts, building maintenance wastewater, laboratory wastewater and air compressor condensate. Treatment consists of equalization, pH adjustment, clarification, sand filtration, and final pH adjustment prior to discharging to the sanitary sewer.

RESOURCES USED TO DRAFT PERMIT

- ☒ Federal Effluent Limitation Guideline 40 CFR Part 433.17
Metal Finishing
- ☐ Performance Standards
- ☐ Federal Development Document
- ☐ Treatability Manual
- ☒ Department File Information
- ☐ Connecticut Water Quality Standards
- ☐ Anti-degradation Policy
- ☐ Coastal Management Consistency Review Form (See Other Comments)
- ☐ Other - Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- X Pretreatment Standards for New Sources (PSNS)
DSN 001-1: Total Cadmium, Silver (Maximum Daily Limit (MDL)), Total Toxic Organics (Maximum Instantaneous Limit (MIL))
- X Case-by-Case Determination Using Best Professional Judgement (See Other Comments)
DSN 001-1: Total Copper, Nickel, and Zinc (MDL and MIL), Ethanolamine, Oil Petroleum Total Recoverable, pH, Total Suspended Solids, Total Cadmium (MIL), Total Phosphorus
- X Section 22a-430-4(s) of the Regulations of Connecticut State Agencies
DSN 001-1: Total Chromium, Cyanide, Lead, Silver (Average Monthly Limit (AML)), Zinc (AML)

GENERAL COMMENTS

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 the maximum daily limit for total silver, maximum daily and average monthly limits for total cadmium, and maximum daily limit for TTO, which was applied as the instantaneous maximum limit using Best Professional Judgement.

COMMENTS RELATED TO THE PERMIT ISSUED ON September 10, 2012

The pH limits of 6.0 to 10.0 S.U. are transferred from the previous permit. These limits are considered to be protective of sanitary sewer systems.

Oil petroleum, total recoverable will be the permit parameter used in this permit, replacing total oil and grease used in the previous permit. The average monthly and maximum daily limits are based on a Case by Case Determination using the criteria of Best Professional Judgement. These limits were 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)). These limits are not expected to cause any problems in the sanitary sewer.

The limits for total chromium, cyanide, lead, silver (AML), and zinc (AML) are consistent with section 22a-430-4(s)(2) of the Regulations of Connecticut state Agencies (RCSA) and the previous permit.

The average monthly, maximum daily and instantaneous limits for total copper and nickel are reduced from the previous permit. The average monthly, maximum daily and instantaneous limits for total copper are reduced from 1.0 mg/l, 2.0 mg/l and 3.0 mg/l to 0.54 mg/l, 0.73 mg/l and 1.09 mg/l, respectively. The average monthly, maximum daily and instantaneous limits for total nickel are reduced from 1.0 mg/l, 2.0 mg/l and 3.0 mg/l to 0.63 mg/l, 0.85 mg/l, and 1.28 mg/l, respectively. The company's historical data shows that the company can consistently meet the tighter limits. In addition, the company discharges to the Waterbury POTW. At this time, the Waterbury POTW has an issue with elevated metals levels such as copper, nickel and zinc in their effluent. Therefore, the Department decided to evaluate all potential sources of metals that contribute to the Waterbury POTW. Department staff is recommending lowering the limits for copper, nickel and zinc, which should help alleviate Waterbury POTW's issues. The maximum daily limit for total zinc is a performance based limit. This limit was calculated using the company's historical zinc data. Limits for the 95th (maximum daily concentration of 1.22 mg/l) and 99th (maximum daily concentration of 1.67 mg/l) were derived and compared with the historical data. The limit derived at the 95th percentile is used in this permit. Total zinc average monthly limit is consistent with section 22a-430-4(s)(2) of the Regulations of Connecticut state Agencies (RCSA) and the previous permit.

The Waterbury POTW asks that all dischargers, which use phosphorus containing chemicals in their process, evaluate the concentration of phosphorus in their effluent. Since the company is currently conducting acid phosphate coating, monitoring for total phosphorus is incorporated during this permit reissuance.

DSN 001-A monitoring point is removed during this permit reissuance. Historically, the company discharged its spent
PERMIT No. SP0002182

coolants to the DSN 001-A treatment system, which consisted of an oil-water separator and an ultrafiltration unit. However, since the company no longer discharges spent coolants, there is no need for the company to sample the wastewater at DSN 001-A. Nevertheless, the company is required to continue using the oil-water separator and the ultrafiltration unit as part of the treatment system for that wastewater. In addition, since the company no longer discharges its spent coolants to the treatment system, only incidental drips of coolant may potentially get into the wastewater treatment system. Therefore, the Department decided to reduce the DSN 001-1 monitoring frequency for ethanalamine, a constituent found in coolants, from quarterly to semi-annually. In addition, the company's historical data show that ethanalamine is not a pollutant of concern.

The limit for TTO was changed during this permit reissuance from 1.42 mg/l to 2.13 mg/l. The maximum daily limit of 2.13 mg/l, listed in 40 CFR Part 433.17 (PSNS), was applied as the instantaneous maximum limit using Best Professional Judgement. The Department decided to make this change so that this permit is more consistent with other individual permits associated with metal finishing discharges. This change is also consistent with section 22a-430-3(l)(4)(D)(vi) of the Regulations of Connecticut state Agencies (RCSA).

The company is subject to 40 CFR Part 433.17 – Pretreatment Standards for New Sources as opposed to 40 CFR Part 433.15 - Pretreatment Standards for Existing Sources because the company's construction commenced after the applicable new source date of August 31, 1982.

The proposed draft permit was public noticed in the Waterbury Republican on July 25, 2012. The Department did not receive any comments on the draft permit.

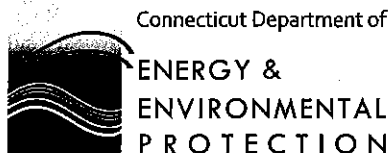
COMMENTS RELATED TO THE 2014 PERMIT MODIFICATION

On September 25, 2014, GLOBAL STEERING SYSTEMS, LLC ("GLOBAL STEERING") submitted to the Department an application to modify its existing SPDES Permit No. SP0002182. Specifically, GLOBAL STEERING requested to have its average monthly and maximum daily flows increased from 9,000 gpd and 9,900 gpd to 20,000 gpd and 25,000 gpd, respectively. The company was previously permitted to discharge at the higher flow rates, but subsequently requested that the permitted flow rates be reduced. The Department evaluated GLOBAL STEERING's flow increase request and determined that the company's treatment system will be able to treat the additional flow of wastewater. However, it appears that measures will have to be implemented to ensure that the company will be able to consistently meet more stringent limits for total zinc that are being incorporated in the modified permit (see below).

GLOBAL STEERING discharges to the Waterbury POTW. Currently, the Waterbury POTW has an issue with elevated levels of metals, specifically copper, nickel and zinc, in its effluent. Therefore, the Department decided to evaluate all potential sources of metals that discharge to the Waterbury POTW. The Department assessed potential pollutant pass-through by comparing historical POTW effluent results to theoretical water quality-based limits ("TWQBLs"). The Waterbury POTW's effluent results were found to be currently and/or chronically above TWQBLs for copper, nickel and zinc. Limits for these parameters were developed on a case-by-case determination using BPJ based on DMR data from all metal finishing facilities in Connecticut from January 2008 to July 2010 and application information for current individual metal finishing pretreatment permits.

When GLOBAL STEERING's permit was reissued in 2012, the Department lowered the total copper and nickel average monthly, maximum daily and maximum instantaneous limits to the limits that were developed based on DMR data from all metal finishing facilities in Connecticut. For total zinc, the average monthly limit of 1.0 mg/l was obtained from section 22a-430-4(s)(2) of the RCSA and was consistent with the limit in the previously issued permit. The lowered maximum daily limit of 1.22 mg/l for total zinc was a performance based limit, using the 95th percentile. The maximum instantaneous limit of 1.83 mg/l was based on BPJ and derived by multiplying the maximum daily limit by a factor of 1.5.

During this permit modification, the Department has lowered GLOBAL STEERING's average monthly, maximum daily and maximum instantaneous limits for total zinc from 1.0 mg/l, 1.22 mg/l and 1.83 mg/l to 0.47 mg/l, 0.72 mg/l and 1.09 mg/l, respectively. These limits were developed on a case-by-case determination using BPJ based on DMR data for all metal finishing facilities in Connecticut. The Department has evaluated GLOBAL STEERING's effluent data to ensure that the company will be able to comply with the new total zinc limits and has decided to allow the company 545 days to implement measures to meet the more stringent permit limits. Within 270 days from permit issuance, GLOBAL STEERING. must submit a status report on such measures.



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

TENTATIVE DECISION

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

In accordance with applicable federal and state law, the Commissioner has made a tentative determination that continuance of the existing system to treat the discharge would protect the waters of the state from pollution and the Commissioner proposes to modify a permit for the discharge to the Waterbury Water Pollution Control Facility ("WPCF") via the sanitary sewer system in the town of Watertown.

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

APPLICANT'S PROPOSAL

GLOBAL STEERING SYSTEMS, LLC presently discharges a maximum of 9,900 gallons per day of treated metal finishing wastewaters, mechanical product manufacturing wastewaters, building maintenance wastewaters, laboratory and air compressor condensate wastewaters to the Waterbury WPCF from manufacturing operations associated with automotive assemblies. The company proposes to increase the discharge to a maximum of 25,000 gallons per day of the above mentioned wastewaters.

The name and mailing address of the permit applicant are: Global Steering Systems, LLC, 156 Park Road, P.O. Box 210, Watertown, CT 06795.

The activity takes place at 156 Park Road, Watertown, CT 06795.

REGULATORY CONDITIONS

Type of Treatment

DSN 001-1: This continuous discharge has treatment consisting of equalization, pH adjustment, clarification, sand filtration, and final pH adjustment.

Effluent Limitations

This permit contains effluent limitations consistent with Pretreatment Standards for New Sources (PSNS) under EPA's Metal Finishing Point Source Category (40 CFR 433), a Case by Case Determination using the criteria of Best Professional Judgement and section 22a-430-4(s) of the Regulations of Connecticut State Agencies and which will protect the waters of the state from pollution when all the conditions of this permit have been met.

In accordance with section 22a-430-4(l) of the Regulations of Connecticut State Agencies the permit contains effluent limitations for the following types of toxic substances: heavy metals, cyanides and volatile organic compounds.

Compliance Schedule

This permit contains an enforceable compliance schedule which requires the applicant to submit a report, within two hundred and seventy (270) days after the date of permit modification, describing measures to be implemented to ensure that GLOBAL STEERING, LLC meets new, more stringent total zinc limits which are being included in the permit for DSN 001-1.

COMMISSIONER'S AUTHORITY

The Commissioner is authorized to approve or deny such permits pursuant to section 22a-430 of the Connecticut General Statutes and the Water Discharge Permit Regulations (sections 22a-430-3 and 4 of the Regulations of Connecticut State Agencies).

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. 201409436

PERMIT ID NO. SP0002182

Interested persons may obtain copies of the application from Gabe Rosa, Global Steering Systems, LLC, 156 Park Road, P.O. Box 210, Watertown, CT 06795, (860) 945-5590.

The application is available for inspection by contacting Ewa Wozniak (860) 424-3025, at the Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127 from 8:30 - 4:30, Monday through Friday.

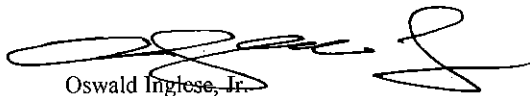
Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the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

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

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

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



Oswald Inglesse, Jr.

Director

Water Permitting and Enforcement Division

Bureau of Materials Management and Compliance Assurance

Dated:

OCT 28 2014