

PRETREATMENT PERMIT

issued to

Warren Corporation
8 Furnace Avenue
Stafford Springs, CT 06076

Location Address:

8 Furnace Avenue
Stafford Springs, CT

Permit ID: SP0000456

Permit Expires: _____

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.
- (B) Warren 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 (Table A) 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 continued use 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. 201201437 for permit reissuance received on March 12, 2012 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 REISSUANCE], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000456, issued by the Commissioner to the Permittee on September 25, 2007, the previous application submitted by the Permittee on August 12, 1999, 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. SP0000456, issued by the Commissioner to the Permittee on September 17, 2007.
- (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] 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. SP0000456, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 201201437 received by the Department on March 12, 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. SP0000456, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].
- (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

Table A								
Discharge Serial Number: DSN 001-1					Monitoring Location: 1			
Wastewater Description: Process wastewaters generated by textile preparation, dyeing and finishing; emergency steam blow-off condensate; compressed air supply condensate; exhaust air odor control wastewater; and seasonally high groundwater which accumulates in the finishing department dryer room.								
Monitoring Location Description: Sampling port after pH adjustment								
Discharge is to: The Town of Stafford 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
Ammonia-Nitrogen	mg/l	NA	50.0	Monthly	Daily Composite	75.0	NR	Grab
Biochemical Oxygen Demand (“BOD ₅ ”)	mg/l	NA	----	Monthly	Daily Composite	NA	NR	Grab
Chemical Oxygen Demand (“COD”)	mg/l	NA	----	Monthly	Daily Composite	NA	NR	Grab
Chromium, Total	mg/l	0.5	1.0	Weekly	Daily Composite	1.5	NR	Grab
Copper, Total	mg/l	0.5	1.0	Weekly	Daily Composite	1.5	NR	Grab
Flow Rate (Average Daily) ¹	gpd	384,000	NA	Daily	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	500,000	Daily	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	500,000	Weekly	Daily Flow	NA	NR	NA
Lead, Total	mg/l	0.1	0.5	Semi-Annually	Daily Composite	0.75	NR	Grab
Oil and Grease, Total	mg/l	50.0	100.0	Monthly	GSA	150.0	NR	Grab
pH (Day of Sampling)	S.U.	NA	NA	NR	NA	6.0-10.0	Weekly	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuously	Continuously
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuously	Continuously
Silver, Total	mg/l	0.1	0.2	Semi-Annually	Daily Composite	0.3	NR	Grab
Total Suspended Solids (“TSS”)	mg/l	NA	----	Weekly	Daily Composite	NA	NR	Grab
Zinc, Total	mg/l	0.5	1.0	Weekly	Daily Composite	1.5	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 Bureau of Materials Management and Compliance Assurance 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 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 Town of Stafford Water Pollution Control Facility, 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 Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing) within thirty (30) days of the exceedance.
- (B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the Town of Stafford Water Pollution Control Facility 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 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 Bureau of Materials Management and Compliance Assurance 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 the 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 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

Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

MM/MVM

cc: Town of Stafford Water Pollution Control Facility

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Warren Corporation

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT No.: SP0000456 APPLICATION No.: 201201437

<u>Mailing Address:</u>	<u>Location Address:</u>
Street: 8 Furnace Avenue	Street: 8 Furnace Avenue
City: Stafford Springs ST: CT Zip: 06076	City: Stafford Springs ST: CT Zip: 06076
Contact Name: John L. Dyson	DMR Contact John L. Dyson
Phone No.: (860) 684-2766 x137	Phone No.: (860) 684-2766 x137
Email: john.dyson@warrencorp.com	Email: john.dyson@warrencorp.com

PERMIT INFORMATION

DURATION	5 Year <u>X</u>	10 Year <u> </u>	30 Year <u> </u>
TYPE	New <u> </u>	Reissuance <u>X</u>	Modification <u> </u>
CATEGORIZATION	POINT (X)	NON-POINT ()	GIS # <u> </u>
NPDES ()	PRETREAT (X)	GROUND WATER (UIC) ()	GROUND WATER (OTHER) ()
		NPDES MAJOR (MA) <u> </u>	
	NPDES SIGNIFICANT MINOR <u>or</u> PRETREAT SIU (SI) <u>X</u>		
	NPDES <u>or</u> PRETREATMENT MINOR (MI) <u> </u>		
	PRETREAT SIGNIFICANT INDUS USER (SIU) <u>X</u>		
	PRETREAT CATEGORICAL (CIU) <u>X</u>		

POLLUTION PREVENTION MANDATE — ENVIRONMENTAL EQUITY ISSUE

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
501062Z	001-1	\$8,425.00

FOR SEWER DISCHARGES

Discharge to the Town of Stafford Water Pollution Control Facility.
The facility I.D. number of the POTW is 134-001.

NATURE OF BUSINESS GENERATING DISCHARGE

Warren Corporation produces broad woven fabrics. Process wastewaters are generated by yarn/fabric dyeing, fabric carbonizing vegetable matter removal, fabric washing, fabric shrinking, and fabric face finishing. Wastewaters also include emergency steam blow-off condensate, compressed air supply condensate, exhaust air odor control wastewater, and seasonally high groundwater which accumulates in the finishing department dryer room.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: Lint removal and pH adjustment.

RESOURCES USED TO DRAFT PERMIT

- ☒ Federal Effluent Limitation Guideline 40 CFR 403 and 40 CFR 410
Pretreatment and Textile Mills
- ☐ Performance Standards
- ☒ Federal Development Document EPA Textile Mills Point Source Category
Development Document
- ☐ Treatability Manual
- ☒ Department File Information
- ☐ Connecticut Water Quality Standards
- ☐ Anti-degradation Policy
- ☐ Coastal Management Consistency Review Form
- ☐ Other

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- ☒ Pretreatment Standards for Existing Sources ("PSES")
- ☒ Case-by-Case Determination using Best Professional Judgement ("BPJ") (See *Other Comments*)

Parameter	Case-by-Case using BPJ
Ammonia-Nitrogen; (MDL, MIL)	X
Chromium, Total; (AML, MDL, MIL)	X
Copper, Total; (AML, MDL, MIL)	X
Lead, Total; (AML, MDL, MIL)	X
Oil and Grease, Total; (AML, MDL, MIL)	X
pH	X
Silver, Total; (AML, MDL, MIL)	X
Zinc, Total; (AML, MDL, MIL)	X

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

GENERAL COMMENTS

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

The pH limits of 6.0-10.0 S.U. are considered to be protective of sanitary sewer systems.

OTHER COMMENTS

Previously, 40 CFR 410, Subpart B (Wool Finishing Subcategory) was referenced as the basis for limits. However, in the permit application dated March 12, 2012, it was indicated that Warren Corporation produces broad woven fabrics. For this reason, 40 CFR 410, Subpart D (Woven Fabric Finishing Subcategory) was used as the basis for the limits in this permit. Warren Corporation is subject to the PSES in 40 CFR 410.44 of the Textile Mills Point Source Category. This subpart indicates that *"Any existing source subject to this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR 403."* A review of previous effluent data served as the basis for the incorporation of the numerical limits in this permit.

In an EPA NPDES Compliance Inspection Report dated May 23, 2012, Rita Langan from the Department's Water Permitting and Enforcement Division ("WPED") noted that samples collected on May 7, 2012 of the wastewater from the production of military blankets using sheep's wool quickly generated unknown gases in the sample containers and swelled the bottles. On May 15, 2013, Mr. John Dyson (Warren Corporation's EHS Coordinator) responded to a *Request for Additional Information* letter and indicated that the cause of this problem was not definitively known. However, Mr. Dyson believed that the manual hand pump used to obtain the grab sample may have been previously used to dispense hydrogen peroxide. In addition, Averill Environmental Laboratory, Inc., Warren Corporation's contract laboratory, advised that that if the sample was contaminated with a small amount of hydrogen peroxide from the hand pump, it would likely cause the off-gassing that swelled the sample bottles but would otherwise have no adverse effect on sample quality.

Effluent results provided in DMR data from 2010 to the present show that there has been very minimal to zero concentrations of lead and silver. Because of this, the monitoring frequencies for both parameters have been changed from weekly and quarterly, respectively, to semi-annually.

In early 2007, Warren Corporation started using the detergent Amanol EOH instead of Amanol NFS. This change was implemented in order to stop the use of detergents at the facility containing Alkylphenol Ethoxylates ("APE").

During a site visit by WPED staff on June 19, 2013, Mr. Dyson requested to move the final pH recorder probe from its current location (weir box at the end of the treatment system) to the point where the second treatment stage discharges to the weir box. A follow-up letter requesting this change was received at the Department on July 11, 2013. Mr. Dyson explained that during periods of no flow, the water in the weir box is less than one half of an inch deep and this is detrimental to the bridge and electrode components of the probe. In addition, this small amount of stagnant water can signal an erroneous reading during long periods of no flow (overnight and weekends). This change was approved on September 18, 2013.

All wastewaters related to textile fabric preparation are directed to one outfall, DSN 001-1. In a letter to Steve Edwards in WPED dated May 31, 2012, Warren Corporation submitted an amendment to Attachment O of the renewal application. This amendment indicated the discharge to the wastewater collection system of seasonal high ground water accumulating in the finishing department dryer room. In addition, Warren Corporation is covered under the *General Permit for the Discharge of Minor Boiler Blowdown Wastewater* and has also been authorized under the *General Permit for Diversion of Water for Consumptive Use* from the Department's Inland Water Resources Division.

The Town of Stafford POTW confirmed its approval with the permit conditions on September 17, 2013.

**NOTICE OF TENTATIVE DECISION
INTENT TO RENEW 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 renew a permit based on an application submitted by **Warren Corporation** ("the applicant") under section 22a-430 of the Connecticut General Statutes for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative decision that continued use of the existing system to treat the discharge will protect the waters of the state from pollution and the Commissioner proposes to renew a permit for the discharge to the sanitary sewer system in the town of Stafford.

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

APPLICANT'S PROPOSAL

Warren Corporation presently has a state permit to discharge a maximum of 500,000 gallons per day of treated process wastewaters to the Town of Stafford Water Pollution Control Facility from textile finishing operations at a textile mill.

The name and mailing address of the permit applicant are: **Warren Corporation, 8 Furnace Avenue, Stafford Springs, CT 06076.**

The activity takes place at: **8 Furnace Avenue, Stafford Springs, CT.**

REGULATORY CONDITIONS

Type of Treatment

DSN 001-1: Lint removal and pH adjustment.

Effluent Limitations

This permit contains effluent limitations consistent with a Case-by-Case Determination using the criteria of Best Professional Judgement, and Pretreatment Standards for Existing Sources (PSES)

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.

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. 201201437

PERMIT ID NO. SP0000456

Interested persons may obtain copies of the application from John L. Dyson, Warren Corporation, 8 Furnace Avenue, Stafford Springs, CT 06076.

The application is available for inspection by contacting Mariana Miller, (860) 424-3018, at the Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, 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 any 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 30 days of this public notice. Written comments should be directed to Mariana Miller, Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, 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/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. Any person with a disability who may need a communication aid or service may contact the agency's ADA Coordinator at (860) 424-3194 or at deep.hrmed@ct.gov. Any person with limited proficiency in English, who may need information in another language, may contact the agency's Title VI Coordinator at (860) 424-3035 or at deep.aaoffice@ct.gov. ADA or Title VI discrimination complaints may be filed with DEEP's EEO Manager at (860) 424-3035 or at deep.aaoffice@ct.gov.

Oswald Inglese, Jr.
Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance

Dated: 10/1/2013