

PRETREATMENT PERMIT
issued to

Bedoukian Research, Inc.
21 Finance Drive
Danbury, Connecticut 06810

Location Address:

21 Finance Drive & 27 Augusta Drive
Danbury, Connecticut 06810

Facility ID: **034-104**

Permit ID: **SP0000004**

Permit Expires: **DRAFT**

SECTION 1: GENERAL PROVISIONS

- (A) This permit is re-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 (“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) **BEDOUKIAN RESEARCH, INC.** (“Permittee”) shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to Section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3: General Conditions

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

“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-annual” when used as a “Sample/Reporting Frequency” shall mean in the months of “June” and “December”.

SECTION 3: COMMISSIONER'S FINAL DETERMINATION

- (A) The Commissioner has made a final determination and found that the discharge will not cause pollution of the waters of the state. The Commissioner's final determination is based on Application No. 200903763 for permit reissuance received on November 10, 2009 and the administrative record established in the processing of that application.
- (B) The Commissioner hereby authorizes the Permittee to discharge in accordance with the provisions of this permit, the above referenced application, and all approvals issued by the Commissioner or the Commissioner's authorized agent for the discharges and/or activities authorized by, or associated with, this permit as follows:
 - (1) From the issuance of this permit through and including [LAST DATE OF PERMIT TERM], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000004, issued by the Commissioner to the Permittee on May 5, 2005, the previous application submitted by the Permittee on August 22, 2000, 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. SP0000004, issued by the Commissioner to the Permittee on May 5, 2005.
 - (2) From [FIRST DATE OF PERMIT TERM] 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. SP0000004, issued by the Commissioner to the Permittee on the issuance date noted on the signature page of this permit, Application No. 200903763 received by the Department on November 10, 2009, 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. SP0000004, issued by the Commissioner to the Permittee on the issuance date noted on the signature page of this permit.
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the 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 discharges shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables below.
- (B) All samples shall be comprised of only those wastewaters identified in the tables. 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. Dilution shall not be used to achieve compliance with the limitations in Table A.
- (C) In cases where limits and sample type are specified but sampling is identified as “NR”, 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.

Table A

Discharge Serial Number: 201-1						Monitoring Location: 1		
Wastewater Description: Laboratory Wastewaters; Handwashing Wastewater; Ice Machine Wastewater; Emergency Discharge of Non-Contact Cooling Water								
Monitoring Location Description: In the manhole located in the southwest corner of Building 1								
Discharge is to: City of Danbury Water Pollution Control Facility								
PARAMETER	UNITS	Average Monthly Limit	Maximum Daily Limit	Sample/ Reporting Frequency ²	Sample Type or Measurement to be Reported	INSTANTANEOUS MONITORING		
						Instantaneous Limit or Required Range	Sample/ Reporting Frequency ²	Sample Type or Measurement to be Reported
Acenaphthene ³	µg/l	2	6	Semi-annual	Grab	6	NR	Grab
Acetone	µg/l	---	---	Semi-annual	Grab	NA	NR	NA
Anthracene ³	µg/l	2	6	Semi-annual	Grab	6	NR	Grab
Benzene ³	µg/l	7	17	Semi-annual	Grab	17	NR	Grab
Bis(2-ethylhexyl)phthalate	µg/l	12	33	Semi-annual	Grab	33	NR	Grab
Carbon tetrachloride ³	µg/l	18	49	Semi-annual	Grab	49	NR	Grab
Chlorobenzene ³	µg/l	18	49	Semi-annual	Grab	49	NR	Grab
Chloroethane ³	µg/l	14	38	Semi-annual	Grab	38	NR	Grab
Chloroform ³	µg/l	14	42	Semi-annual	Grab	42	NR	Grab
Di-n-butyl phthalate	µg/l	3	6	Semi-annual	Grab	6	NR	Grab
Di-n-octyl phthalate	µg/l	---	---	Semi-annual	Grab	NA	NR	NA
1,2-Dichlorobenzene ³	µg/l	25	102	Semi-annual	Grab	102	NR	Grab
1,3-Dichlorobenzene ³	µg/l	18	49	Semi-annual	Grab	49	NR	Grab
1,4-Dichlorobenzene ³	µg/l	18	49	Semi-annual	Grab	49	NR	Grab
1,1-Dichloroethane ³	µg/l	3	8	Semi-annual	Grab	8	NR	Grab
1,2-Dichloroethane	µg/l	23	74	Semi-annual	Grab	74	NR	Grab
1,1-Dichloroethylene	µg/l	3	8	Semi-annual	Grab	8	NR	Grab
1,2-trans-Dichloroethylene ³	µg/l	3	9	Semi-annual	Grab	9	NR	Grab
1,2-Dichloropropane ³	µg/l	25	102	Semi-annual	Grab	102	NR	Grab
1,3-Dichloropropylene ³	µg/l	25	102	Semi-annual	Grab	102	NR	Grab
Diethyl phthalate	µg/l	6	15	Semi-annual	Grab	15	NR	Grab
Dimethyl phthalate	µg/l	2	6	Semi-annual	Grab	6	NR	Grab
4,6-Dinitro-o-cresol ³	µg/l	10	36	Semi-annual	Grab	36	NR	Grab
Ethylbenzene	µg/l	18	49	Semi-annual	Grab	49	NR	Grab
Flow, Average Daily ¹	gpd	---	NA	Continuous ¹	Daily Flow	NA	NR	NA
Flow, Maximum ¹	gpd	NA	40,000	Continuous ¹	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	---	40,000	Semi-annual	Daily Flow	NA	NR	NA
Fluoranthene ³	µg/l	3	7	Semi-annual	Grab	7	NR	Grab
Fluorene ³	µg/l	2	6	Semi-annual	Grab	6	NR	Grab
Hexachlorobenzene ³	µg/l	25	102	Semi-annual	Grab	102	NR	Grab

Table A

Discharge Serial Number: 201-1						Monitoring Location: 1		
Wastewater Description: Laboratory Wastewaters; Handwashing Wastewater; Ice Machine Wastewater; Emergency Discharge of Non-Contact Cooling Water								
Monitoring Location Description: In the manhole located in the southwest corner of Building 1								
Discharge is to: City of Danbury Water Pollution Control Facility								
PARAMETER	UNITS	Average Monthly Limit	Maximum Daily Limit	Sample/ Reporting Frequency ²	Sample Type or Measurement to be Reported	INSTANTANEOUS MONITORING		
						Instantaneous Limit or Required Range	Sample/ Reporting Frequency ²	Sample Type or Measurement to be Reported
Hexachlorobutadiene ³	µg/l	18	49	Semi-annual	Grab	49	NR	Grab
Hexachloroethane ³	µg/l	25	102	Semi-annual	Grab	102	NR	Grab
Methyl chloride ³	µg/l	14	38	Semi-annual	Grab	38	NR	Grab
Methylene chloride	µg/l	5	22	Semi-annual	Grab	22	NR	Grab
Naphthalene ³	µg/l	2	6	Semi-annual	Grab	6	NR	Grab
Nitrobenzene ³	µg/l	289	826	Semi-annual	Grab	826	NR	Grab
2-Nitrophenol ³	µg/l	8	30	Semi-annual	Grab	30	NR	Grab
4-Nitrophenol ³	µg/l	21	74	Semi-annual	Grab	74	NR	Grab
pH, Day of Sampling	SU	NA	NA	NR	NA	6.0 to 10.0	Semi-Annual	RDS
Phenanthrene ³	µg/l	2	6	Semi-annual	Grab	6	NR	Grab
Pyrene ³	µg/l	3	6	Semi-annual	Grab	6	NR	Grab
Tetrachloroethylene ³	µg/l	7	21	Semi-annual	Grab	21	NR	Grab
Tetrahydrofuran	µg/l	---	---	Semi-annual	Grab	NA	NR	NA
Toluene	µg/l	4	10	Semi-annual	Grab	10	NR	Grab
Total Cyanide	µg/l	54	155	Semi-annual	Grab	155	NR	Grab
Total Lead	µg/l	41	89	Semi-annual	Grab	89	NR	Grab
Total Zinc	µg/l	135	337	Semi-annual	Grab	337	NR	Grab
1,2,4-Trichlorobenzene ³	µg/l	25	102	Semi-annual	Grab	102	NR	Grab
1,1,1-Trichloroethane	µg/l	3	8	Semi-annual	Grab	8	NR	Grab
1,1,2-Trichloroethane	µg/l	4	16	Semi-annual	Grab	16	NR	Grab
Trichloroethylene	µg/l	3	9	Semi-annual	Grab	9	NR	Grab
Vinyl chloride	µg/l	13	22	Semi-annual	Grab	22	NR	Grab

TABLE A FOOTNOTES AND REMARKS

Footnotes:

¹ For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month. Total flow shall be measured by estimating the flow from each of four authorized wastewater sources. If a flow meter is added to any of the four sources, the total flow shall be measured by the flow meter on the metered sources and by an estimate on the unmetered sources.

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 The Permittee has applied for and has been granted a monitoring waiver for these noted pollutants ("waived pollutants"). The Permittee has certified that these pollutants are neither present nor expected to be present in the discharge or are present only at background levels from intake water and without any increase in the pollutant due to the activities of the Permittee. The Permittee must certify semi-annually (June and December) that there has been no increase in any waived pollutant in the wastewater as a result of the Permittee's activities. In the event that a waived pollutant is found to be present or is expected to be present in the wastewater based on changes in the Permittee's operations, the Permittee must immediately notify the Department and shall also immediately comply with the monitoring provisions for the subject waived pollutant(s) as set forth in this table. The monitoring waiver is valid for the effective term of the permit only. The Permittee shall use the "Monitoring Waiver Certification" attached to this permit.

Remarks:

1. Abbreviations used for units are as follows: µg/l means micrograms per day; gpd means gallons per day; SU means Standard Units. Other abbreviations are as follows: NA means "Not Applicable"; NR means "Not Reportable" (unless monitoring is conducted under Paragraph 4(C) of this permit); RDS means "Range During Sampling".

2. Boiler blowdown is also discharged via DSN 201-1. However, this wastestream is covered by a general permit.

3. Sampling for DSN 201-1 shall occur when there is no boiler blowdown comprising the discharge.

Table B**Discharge Serial Number:** 203-1**Monitoring Location:** 1**Wastewater Description:** *Emergency Discharge of Non-Contact Cooling Water***Monitoring Location Description:** In the manhole located in the southwest corner of Building 1**Discharge is to:** City of Danbury Water Pollution Control Facility

PARAMETER	UNITS	Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency ²	Sample Type or Measurement to be Reported	INSTANTANEOUS MONITORING		
						Instantaneous Limit or Required Range	Sample// Reporting Frequency ²	Sample Type or Measurement to be Reported
Copper, Total	mg/L	---	---	Monthly	Grab	NA	NR	NA
Duration of Discharge	hrs/day	---	---	Monthly	Daily Flow	NA	NR	NA
Flow, Average Daily ¹	gpd	---	NA	Continuous	Daily Flow	NA	NR	NA
Flow, Maximum ¹	gpd	NA	---	Continuous	Daily Flow	NA	NR	NA
Lead, Total	mg/L	---	---	Monthly	Grab	NA	NR	NA
pH, Minimum	SU	NA	NA	NR	NA	6.0	Monthly	Minimum
pH, Maximum	SU	NA	NA	NR	NA	10.0	Monthly	Maximum
Temperature	°F	NA	NA	NR	NA	---	Grab	Monthly
Zinc, Total	mg/L	---	---	Monthly	Grab	NA	NR	NA

TABLE B FOOTNOTES AND REMARKS**Footnotes:**

¹ If there is a discharge, the flow shall be estimated. If a flow meter is added, the flow shall be measured by the flow meter.

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'.

Remarks:

1. Abbreviations used for units are as follows: mg/L means milligrams per liter; hrs/day means hours per day; gpd means gallons per day; SU means Standard Units; °F means degrees Fahrenheit. Other abbreviations are as follows: NA means "Not Applicable"; NR means "Not Reportable" (unless monitoring is conducted under Paragraph 4(C) of this permit).

2. Sampling for DSN 203-1 shall only be required when there is a discharge.

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. The "Monitoring Waiver Certification" shall also be submitted along with the DMR. 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.

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 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 24 hours of becoming aware of the violation.

SECTION 7: COMPLIANCE CONDITIONS

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 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.

SECTION 8: SPECIAL CONDITION

The Permittee shall maintain compliance with its "Best Management Plan for Sinks", June 2011, or any updated versions approved by the Department.

This permit is hereby issued on

DRAFT

MACKY MCCLEARY
Deputy Commissioner

MM:CMG
copy: Danbury WPCF

MONITORING WAIVER CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for 40 CFR 414, I certify that, to the best of my knowledge and belief, there has been no increase in the level of:

- Acenaphthene
- Anthracene
- Benzene
- Carbon Tetrachloride
- Chlorobenzene
- Chloroethane
- Chloroform
- 1,2-Dichlorobenzene
- 1,3-Dichlorobenzene
- 1,4-Dichlorobenzene
- 1,1-Dichloroethane
- 1,2-trans-Dichloroethylene
- 1,2-Dichloropropane
- 1,3-Dichloropropylene
- 4,6-Dinitro-o-cresol
- Fluoranthene
- Fluorene
- Hexachlorobenzene
- Hexachlorobutadiene
- Hexachloroethane
- Methyl chloride
- Naphthalene
- Nitrobenzene
- 2-Nitrophenol
- 4-Nitrophenol
- Phenanthrene
- Pyrene
- Tetrachloroethylene
- 1,2,4-Trichlorobenzene

in the wastewaters due to the activities at the facility since filing of the last periodic report under 40 CFR 403.12(e)(i).

Authorized Official (Print Name): _____ Title: _____

Signature: _____ Date: _____

FACT SHEET
SPDES PERMIT RENEWAL

APPLICANT	BEDOUKIAN RESEARCH, INC.
SPDES PERMIT NO.	SP0000004
APPLICATION NO.	200903763
DATE APPLICATION RECEIVED	November 10, 2009
FACILITY ID.	034-104
LOCATION ADDRESS	21 Finance Drive Danbury, Connecticut 06180
FACILITY CONTACT	Joseph Bania, Regulatory Affairs Manager Office Phone: 203-830-4000 x 432 FAX: 203-830-4010 jbania@bedoukian.com
MAILING ADDRESS	21 Finance Drive Danbury, Connecticut 06810
DMR CONTACT	Joseph Bania
BILLING CONTACT	Robert H. Bedoukian
PERMIT TERM	5 years
PERMIT CATEGORY	Significant Industrial User: ☒ Subject to Categorical Pretreatment Standards: 40 CFR 414 OR ☐ Discharges an average of 25,000 gpd or more of process wastewater ☐ Contributes 5% or more of the hydraulic/organic capacity of the POTW ☐ Designated as SIU on the basis of its operations
SIC CODES	2869 (Industrial Organic Chemicals, NEC) 2899 (Chemicals and Chemical Preparations, NEC)
PERMIT TYPE	Renewal
OWNERSHIP	Private
POTW THAT RECEIVES THE DISCHARGE	City of Danbury Water Pollution Control Facility [Still River]
DEP STAFF ENGINEER	Christine Gleason (860/424-3278) christine.gleason@ct.gov

PERMIT FEES

Application Filing Fee: \$1,300. Paid on November 10, 2009

Application Processing Fee: \$7,600.00 (Invoice 209933). Paid on July 23, 2012

Annual Fee:

DISCHARGE CODE	WASTEWATER CATEGORY (per 22a-430-7)	MAXIMUM GPD or CATEGORY	DSN	ANNUAL FEE (per 22a-430-7)
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501042Y	Organic Chemicals Manufacturing (Laboratory glassware/container wastewater)	0-50,000	201	4,337.50
502000b	Non-contact Cooling Water (Non-contact cooling water, Handwashing wastewater, Ice machine wastewater)	0-100,000	201/203	656.25
TOTAL				\$4,993.75

I. APPLICANT

Bedoukian Research, Inc. ("Bedoukian") is seeking a renewal of its SPDES permit (SP00000004) for authorization of the discharge of wastewater from certain ancillary operations associated with its chemical manufacturing/formulating operations in Danbury. On November 10, 2009, the Department received Application No. 200903763 for the subject SPDES permit. This application was noticed in *The News-Times* on April 30, 2010. On May 25, 2010, the application was determined to be timely and administratively sufficient.

The applicant seeks authorization for the following:

DSN	PROPOSED AVERAGE MONTHLY FLOW (gpd)	PROPOSED MAXIMUM DAILY FLOW (gpd)	PROPOSED WASTESTREAMS	TREATMENT TYPE	DISCHARGE TO
201-1	760	40,000	Laboratory glassware/container wastewater; Handwashing wastewater; Ice machine wastewater; Non-contact cooling water associated with the failure of cooling system	None	City of Danbury WPCF
203-1	---	---	Non-contact cooling water associated with the failure of the cooling system	None	City of Danbury WPCF

DSN 202-1 was eliminated in November 2011.

II. BACKGROUND

Bedoukian is engaged in the manufacture and formulation of various chemicals at its facility in Danbury. The wastewater associated with these operations was historically treated and discharged into the sewer (via DSN 202-1). However, the treatment system went through closure in the fall of 2011; the wastewaters that had been treated in the on-site wastewater treatment system are now containerized and shipped off-site to a treatment, storage, and disposal facility (TSDF). The remaining discharges at the site (DSN 201-1 and DSN 203-1) consist of wastewater associated with ancillary activities related to the chemical manufacturing/formulating operations (e.g., wastewater from cleaning the glassware/containers, non-contact cooling water, etc.). This wastewater is discharged to the City of Danbury's Water Pollution Control Facility by way of permit SP00000004.

III. ISSUES RELATED TO THE APPLICATION

A. FEDERALLY-RECOGNIZED INDIAN LAND

As provided in the permit application, the site is not located on federally-recognized Indian land.

B. COASTAL AREA/COASTAL BOUNDARY

The subject site is not located in a coastal area/coastal boundary.

C. ENDANGERED SPECIES

The subject site is located within an area identified as a habitat for endangered, threatened, or special-concern species (December 2011 map). However, this activity involves the renewal of a sewer discharge permit and would therefore, not be expected to be an impact.

D. AQUIFER PROTECTION AREAS

The project site is located within a town required to establish Aquifer Protection Areas, but the site is not within a protected area identified on a Level A or Level B map.

IV. NATURE OF THE BUSINESS GENERATING THE DISCHARGE

Bedoukian is in the business of manufacturing aroma chemicals, insect pheromones (semiochemicals), and other miscellaneous chemicals. The SIC codes, as provided by the applicant, are 2869 (Industrial Organic Chemicals, NEC) and 2899 (Chemicals and Chemical Preparations, NEC).

V. FACILITY DESCRIPTION

Bedoukian is in the business of manufacturing/formulating chemicals. It has been in operation since 1972. The facility is located in a mixed commercial/industrial area in Danbury. Bedoukian occupies two buildings on-site; one building is located at 21 Finance Drive ("Building 2") and is used primarily for administrative functions; another building is located at 27 Augusta Drive ("Building 1") and is used primarily to manufacture/formulate the chemicals. Bedoukian makes over 1,200 specialty organic chemicals ranging in size from 1 gram to 300 gallons. These chemicals include: aroma chemicals (50%), insect pheromones/semiochemicals (20%); internal chemical intermediaries (28%); and miscellaneous specialty chemicals (2%). Large scale orders are made in assorted-sized reactors in the reactor room; small scale orders are filled in the laboratory using flasks or small reactors. The wastewater from the reactor room had historically been treated on-site and discharged into the sewer (via DSN 202-1). However, these wastewaters are now containerized and shipped off-site for management at a TSDF. The only remaining discharge points are DSN 201-1 and DSN 203-1. The DSN 201-1 discharge point receives wastewater generated from the third rinsing of glassware/containers associated with the chemical manufacturing/formulating operations, as well as handwashing wastewater, ice machine wastewater, and non-contact cooling water if there is a failure of the chiller. [Boiler blowdown is also discharged via DSN 201-1. However, this wastestream is covered by a general permit]. The DSN 203-1 discharge point receives wastewater generated as the result of the failure of the non-contact cooling water system. Both DSN 201-1 and DSN 203-1 are conveyed to the City of Danbury's Water Pollution Control Facility. [See Attachment 1 for the plan view of Building 1; Attachment 2 for the Line Diagram; and Attachment 3 for Bedoukian's "Best Management Plan for Sinks"].

VI. THE ON-SITE WASTEWATER TREATMENT SYSTEM

There is no longer a wastewater treatment system on-site. The wastestreams discharged via DSN 201-1 and DSN 203-1 are not treated. The discharge from DSN 201-1 occurs intermittently; the discharge from DSN 203-1 only occurs in the event of a failure of the chiller.

VII. EFFLUENT QUALITY DATA

The effluent has not been routinely monitored; one sample is provided with the permit application.

VIII. EFFLUENT & REPORTING VIOLATIONS

See below.

IX. OUTSTANDING ENFORCEMENT (RELATED TO WASTEWATER DISCHARGES):

NOV WR IN 12 002 was issued to Bedoukian on February 21, 2012 for the following: 1) Failure to sample DSN 201-1 since 2009; 2) Failure to accurately report the maximum daily flow for DSN 201-1. NOV WR IN 12 002 was closed on May 8, 2012.

X. SPILL HISTORY

No spills in the last five years.

XI. EFFLUENT GUIDELINES

Bedoukian is in the business of manufacturing/formulating chemicals. Discharge DSN 203-1 is a non-contact cooling water discharge and would not be subject to any categorical. The following effluent limitation guidelines were examined to determine whether Bedoukian's discharge, DSN 201-1, is a categorical discharge:

- 40 CFR 414 (*Organic Chemicals, Plastics, and Synthetic Fibers*): Based on the evaluation conducted by Bedoukian staff, nearly all of the chemicals manufactured at the facility (aroma chemicals, insect pheromones, chemical intermediates, and specialty chemicals) are subject to 40 CFR 414, Subpart H. The basis for this review was EPA's *Product and Product Group Discharges Subject to Effluent Limitations and Standards for the Organic Chemicals, Plastics, and Synthetic Fibers Point Source Category – 40 CFR 414*, April 2005. Therefore, any process wastewater associated with this operation would be subject to 40 CFR 414. The laboratory wastewater has been determined to be a process wastewater subject to 40 CFR 414. The OCPSF operations were initiated before March 21, 1983, therefore, the Pretreatment Standards for Existing Sources (PSES) at 40 CFR 414, Subpart H (40 CFR 414.85) apply to the discharge.
- 40 CFR 455 (*Pesticide Chemicals*): Bedoukian does manufacture, formulate, and package chemicals designated by EPA as pesticides (for registration purposes). However, it does not manufacture pesticides with active ingredients identified in Table 1 of 40 CFR 455; therefore, Subpart A of 40 CFR 455 (Organic Pesticide Chemicals Manufacturing Subcategory) does not apply. Bedoukian's operations do appear to be subject to 40 CFR 455, Subpart C (Pesticide Chemicals Formulating and Packaging Subcategory). However, the only wastestream that has the potential to be subject to this subpart is the wastewater that is generated from cleaning the glassware/containers associated with the chemical formulating operations and this wastestream is specifically excluded by way of 40 CFR 455.40(c).
- 40 CFR 454 (*Gum and Wood Chemicals Industry*): Bedoukian does re-distill certain oils. However, the two "essential oils" identified in 40 CFR 454, Subpart E concern cedarwood oil and pine scent. Neither of these two oils are manufactured or re-distilled on-site.

XII. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

RESOURCES USED TO DRAFT PERMIT			DISCHARGE POINT(S)
☒	Federal Effluent Limitation Guideline (ELG)	40 CFR 414, Subpart H 40 CFR 414, Subpart K	DSN 201-1
☐	Performance Standards		
☐	Federal Development Document		
☐	Treatability Manual		
☐	Department File Information		
☒	Other	<i>Product and Product Group</i>	DSN 201-1

RESOURCES USED TO DRAFT PERMIT			DISCHARGE POINT(S)
		<i>Discharges Subject to Effluent Limitations and Standards for the Organic Chemicals, Plastics, and Synthetic Fibers Point Source Category – 40 CFR 414, April 2005</i>	

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		REGULATION	DISCHARGE POINT(S)
☒	Pretreatment Standards for Existing Sources (PSES)	40 CFR 414, Subpart K	DSN 201-1
☐	Pretreatment Standards for New Sources (PSNS)		
☒	Case-by-Case Determination using Best Professional Judgment (BPJ)	40 CFR 403 RCSA 22a-430-4(m)	DSN 201-1 DSN 203-1

DSN 201-1:

- A. WASTESTREAMS AUTHORIZED FOR DISCHARGE UNDER DSN 201-1:** Laboratory glassware/container wastewater; Handwashing wastewater; Ice machine wastewater; Non-contact cooling water associated with the failure of cooling system.
- B. POLLUTANTS OF CONCERN:** The pollutants of concern for the laboratory wastewater include the OCPSF pollutants at 40 CFR 414, Subpart K. In addition, acetone, tetrahydrofuran, and di-n-octylphthalate can be expected to be present in the laboratory wastewater and are therefore also pollutants of concern. No additional pollutants need to be monitored in order to address the remaining wastestreams that comprise DSN 201-1.
- C. MONITORING PARAMETERS & LIMITS:** The laboratory glassware/container wastewater would be classified as an OCPSF process water; the remaining wastestreams that comprise DSN 201-1 are dilution wastestreams. Therefore, the ratio of process wastewater to total discharge flow is used to determine the effluent limits. This ratio is 40:310. [Note: Limits in the existing permit were based on a ratio of 720:1020]. The derivation of the permit limits is located on Attachment 4.
- D. EXPRESSION OF LIMITS:** Section 40 CFR 414, Subpart K requires that mass-based limitations be applied to the discharge. However, the "Pretreatment Streamlining Rule" now allows for flexibility to control OCPSF discharges through equivalent concentration-based limits in lieu of flow-based mass limits (40 CFR 403.6(c)(6)). Use of concentration-based limits in lieu of mass-based limits is contingent upon dilution not being used to meet the limits. The permit will now only include concentration-based limits; a condition in Section 4(B) of the permit prohibits the use of dilution to meet the limits. Documentation as to how the equivalent limits were derived is described on Attachment 4.
- E. MONITORING FREQUENCY:** The *Monitoring Schedule* set forth in RCSA Section 22a-430-3 prescribes a frequency of monthly for DSN 201-1. Given the nature of the discharge semi-annually is more appropriate.
- F. MONITORING WAIVER:** Consistent with the requirements at 40 CFR 403.12(e)(2), Bedoukian has submitted certified documentation demonstrating that through sampling and other technical factors certain categorical pollutants regulated under 40 CFR 414, Subpart K are either: 1) neither present nor expected to be present in the discharge or 2) are present only at background levels from intake water and without any increase in the pollutant due to activities of the Permittee. Bedoukian has made that demonstration for the following pollutants: Acenaphthalene, Anthracene,

Benzene, Carbon tetrachloride, Chlorobenzene, Chloroethane, Chloroform, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,1-Dichloroethane, 1,2-trans-Dichloroethylene, 1,2-Dichloropropane, 1,3-Dichloropropylene, 4,6-Dinitro-o-cresol, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Methyl chloride, Naphthalene, Nitrobenzene, 2-Nitrophenol, 4-Nitrophenol, Phenanthrene, Pyrene, Tetrachloroethylene, 1,2,4-Trichlorobenzene. Based on the representations made by Bedoukian, the Department has granted the request for a monitoring waiver for the subject pollutants. Bedoukian will now be able to forgo sampling with respect to these pollutants provided that it submits to the Department, on a semi-annual basis, a certification statement consistent with the requirements of 40 CFR 403.12(e)(2)(v). The monitoring waiver is valid for the effective term of the permit only. The terms and conditions of the monitoring waiver have been incorporated into the permit (i.e., Footnote 3 of Table A).

DSN 203-1:

- G. WASTESTREAMS AUTHORIZED FOR DISCHARGE UNDER DSN 203-1:** Non-contact cooling water associated with the failure of cooling system.
- H. MONITORING PARAMETERS & LIMITS:** The monitoring parameters were determined based on the constituents that would be in non-contact cooling water.
- I. MONITORING FREQUENCY:** Since this discharge will only occur when there is a failure of the chiller system, sampling shall only be required during a failure.

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

TENTATIVE DETERMINATION

The Commissioner of Energy and Environmental Protection hereby gives notice of a tentative decision to renew a permit based on an application submitted by **BEDOUKIAN RESEARCH, INC.** ("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 continuance of the existing discharge would not cause pollution of the waters of the state and the Commissioner proposes to renew a permit for the discharge to the sanitary sewer.

The proposed permit, if issued by the Commissioner, will require that all wastewater be periodically monitored to demonstrate that the discharge will not cause pollution.

APPLICANT'S PROPOSAL

Bedoukian Research, Inc. will be authorized to discharge up to 40,000 gallons per day of wastewater associated with its aroma chemical manufacturing/formulating operations into the City of Danbury's Water Pollution Control Facility. The permitted discharges will also consist of wastewater from ancillary operations at the facility.

The name and mailing address of the permit applicant are: Bedoukian Research, Inc., 21 Finance Drive, Danbury, Connecticut 06810.

The activity takes place at: 21 Finance Drive and 27 Augusta Drive, Danbury, Connecticut.

REGULATORY CONDITIONS

Type of Treatment

DSN 201-1: (Laboratory Wastewaters; Handwashing Wastewater; Ice Machine Wastewater; Emergency Discharge of Non-Contact Cooling Water) No treatment required

DSN 203-1: (Emergency Discharge of Non-Contact Cooling Water): No treatment required

Effluent Limitations

This permit contains effluent limitations consistent with: 1) Federal Pretreatment Standards for Existing Sources; 2) a Case-by-Case determination using the criteria of Best Professional Judgment.

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 substances: metals, cyanide, volatile organics, and semi-volatile organics.

Special Conditions

This permit contains a special condition related to DSN 201-1 which allows for a monitoring waiver from sampling for certain pollutants which are expected to either not be in the discharge or which are in the discharge at background levels only.

COMMISSIONER'S AUTHORITY

The Commissioner of Energy and Environmental Protection 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. **200903763**

PERMIT ID NO. **SP0000004**

FACILITY ID NO. **034-104**

Interested persons may obtain copies of the application from Joseph Bania, Regulatory Affairs Manager, Bedoukian Research, Inc., 21 Finance Drive, Danbury, Connecticut (203-830-4000 x432).

The application is available for inspection by contacting Christine Gleason at (860) 424-3278 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 notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

PUBLIC COMMENT

Prior to making a final decision to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within 30 days of this public notice. Written comments should be directed to Christine Gleason, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT, 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby, and shall hold a hearing upon receipt of a petition signed by at least twenty-five persons. Notice of any public hearing shall be published at least 30 days prior to the hearing.

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

The Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer. Persons with a disability who may need information in an alternative format should contact the ADA Coordinator at 860-424-3194 or at DEEP.HRmed@CT.gov. Persons who are limited English proficient who may need information in another language should contact the Title VI Coordinator at (860) 424-3035 or at DEEP.aaoffice@ct.gov. Persons who are hearing impaired should call the State of Connecticut relay number 711. Discrimination complaints should be filed with the Title VI Coordinator.

OSWALD INGLESE, JR., Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance

Dated:2/5/2013