

PRETREATMENT PERMIT
issued to

Seaboard Metal Finishing Co., Inc.
50 Fresh Meadow Road
West Haven, Connecticut 06516

Location Address:

50 Fresh Meadow Road
West Haven, Connecticut 06516

Facility ID: **156-022**

Permit ID: **SP0000127**

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) **SEABOARD METAL FINISHING CO., 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
- (k) Bypass
- (l) Conditions Applicable to POTWs
- (m) Effluent Limitation Violations (Upsets)
- (n) Enforcement
- (o) Resource Conservation
- (p) Spill Prevention and Control
- (q) Instrumentation, Alarms, Flow Recorders
- (r) Equalization

Section 22a-430-4 Procedures and Criteria

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

- (e) Tentative Determination
 - (f) Draft Permits, Fact Sheets
 - (g) Public Notice, Notice of Hearing
 - (h) Public Comments
 - (i) Final Determination
 - (j) Public Hearings
 - (k) Submission of Plans and Specifications. Approval.
 - (l) Establishing Effluent Limitations and Conditions
 - (m) Case by Case Determinations
 - (n) Permit issuance or renewal
 - (o) Permit Transfer
 - (p) Permit revocation, denial or modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements for Metals and Cyanide
 - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under Section 22a-438 or 22a-131a of the CGS or in accordance with Section 22a-6, under Section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection (“the Commissioner”). To request such approval, the Permittee and proposed Transferee shall register such proposed transfer with the Commissioner at least 30 days prior to the Transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the Transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the Transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in Section 22a-430-7 of the Regulations of Connecticut State Agencies.

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in Section 22a-423 of the CGS and Section 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above the following definitions shall apply to this permit:
- “---” in the limits column on the monitoring table means a limit is not specified but a value must be reported on the DMR.
- “Average Monthly Limit” means the maximum allowable “Average Monthly Concentration” as defined in Section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g., mg/l). Otherwise, it means “Average Monthly Discharge Limitation” as defined in Section 22a-430-3(a) of the RCSA.
- “Daily Concentration” means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

“Daily Quantity” means the quantity of waste generated during an operating day.

“Instantaneous Limit” means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

“Maximum Daily Limit” means the maximum allowable “Daily Concentration” (defined above) when expressed as a concentration (e.g., mg/l). Otherwise, it means the maximum allowable “Daily Quantity” as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means “Maximum Daily Flow” as defined in Section 22a-430-3(a) of the RCSA.

“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 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. 201003863 for permit reissuance received on June 11, 2010 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 [INSERT LAST DAY OF PERMIT TERM], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000127, issued by the Commissioner to the Permittee on December 13, 2005, the previous application submitted by the Permittee on August 21, 1998, 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. SP0000127, issued by the Commissioner to the Permittee on December 13, 2005.
 - (2) From [FIRST DAY OF THE 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. SP0000127, issued by the Commissioner to the Permittee on the issuance date noted on the signature page of this permit, Application No. 201003863 received by the Department on June 11, 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. SP0000127, 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.
- (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.

Table A**Discharge Serial Number:** 001-1**Monitoring Location:** 1

Wastewater Description: *Electroplating, electropolishing, cleaning, and passivating rinsewaters; Air scrubber wastewater; Laboratory wastewater; Floorwash water; Carbon filter rinsewater; Container rinsewater; Stormwater from the roof near the scrubber; Stormwater from the storage tank containment area; Boiler blowdown; Air compressor condensate/blowdown; Sandfilter backwash; Filter press filtrate*

Monitoring Location Description: After the Clarifier and prior to the Discharge Tank

Discharge is to: City of West Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency ²	Sample Type or Measurement to be Reported
Cadmium, Total	mg/l	0.07	0.11	Semi-annually	Daily Composite	0.16	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
Copper, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
Cyanide, Amenable	mg/L	0.1	0.2	Weekly	Grab Sample Average	0.3	NR	Grab
Cyanide, Total	mg/l	0.65	1.20	Weekly	Grab Sample Average	1.80	NR	Grab
Flow Rate (Average Daily) ¹	gpd	70,000	NA	Continuous	Total Daily Flow	NA	NR	NA
Flow, Maximum during 24 hour period ¹	gpd	NA	80,000	Continuous	Total Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	---	80,000	Weekly	Total Daily Flow	NA	NR	NA
Lead, Total	mg/L	0.1	0.5	Weekly	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
pH, Day of Sampling	SU	NA	NA	NR	NA	6.0 to 10.0	Weekly	RDS
pH, Minimum	SU	NA	NA	NR	NA	6.0	Continuous	Minimum
pH, Maximum	SU	NA	NA	NR	NA	10.0	Continuous	Maximum
Silver, Total	mg/l	0.10	0.43	Semi-annually	Daily Composite	0.64	NR	Grab
Tin, Total	mg/l	2.0	4.0	Weekly	Daily Composite	6.0	NR	Grab
Total Suspended Solids	mg/l	20	30	Monthly	Daily Composite	45	NR	Grab
Total Toxic Organics ³	mg/l	NA	2.13	Semi-annually	Grab Sample Average	3.20	NR	Grab
Zinc, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab

Table A 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 The Permittee shall conduct Total Toxic Organics monitoring at least semi-annually. Certification (as set forth in Paragraph 5(G) of this permit) cannot be used in lieu of testing.

Table A Remark:

1. Abbreviations used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; SU means Standard Units. Other abbreviations are as follows: NA means “Not Applicable”; NR means “Not Reportable” (unless sampling is conducted per Paragraph 4(C)); RDS means “Range During Sampling”.

Table B								
Discharge Serial Number: 001-A						Monitoring Location: 1		
Wastewater Description: Chromium-bearing rinsewaters								
Monitoring Location Description: After the chromium treatment tank								
Discharge is to: DSN 001-1								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency ¹	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency ²	Sample Type or Measurement to be Reported
Chromium, Hexavalent	mg/l	0.1	0.2	Weekly	Grab Sample Average	0.3	NR	Grab
Table B Footnote:								
¹ 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’.								
Table B Remark:								
1. Abbreviations used for units are as follows: mg/L means milligrams per liter. Other abbreviations are as follows: NR means Not Reportable (unless sampling is conducted per Paragraph 4(C)).								

Table C								
Discharge Serial Number: 001-B					Monitoring Location: 1			
Wastewater Description: Cyanide-bearing rinsewaters								
Monitoring Location Description: Each batch treatment tank discharge to the sump								
Discharge is to: DSN 001-1								
PARAMETER	UNITS	Average Monthly Limit ²	Maximum Daily Limit	Sample//Reporting Frequency ¹	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency ²	Sample Type or Measurement to be Reported
Cyanide, Amenable	mg/l	0.32	0.86	Per Batch Treated	Grab	0.86	NR	Grab
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
Flow, Total	gpd	NA	---	Per Batch Treated	Total Flow	NA	NR	NA
Table C Footnotes:								
¹ 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’.								
² The value reported for “Average Monthly Limit” shall be the arithmetic average of all of the grab samples taken in the calendar month.								
Table C Remark:								
1. Abbreviations used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter. Other abbreviations are as follows: NA means Not Applicable; NR means Not Reportable (unless sampling is conducted per Paragraph 4(C)).								

SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in Section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance at the following address. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at this address by the last day of the month following the month in which samples are taken.

Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division (Attn: DMR Processing)
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g., monthly, quarterly, etc.) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g., per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.
- (E) NetDMR Reporting Requirements: 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:
 - (1) 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 to initiate the NETDMR subscription process for electronic submission of Discharge Monitoring Report (DMR) information. A copy of the NetDMR subscriber form is available on the Department's website. 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.
 - (2) 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>.

- (3) 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.
- (4) 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 ("WPCA") involved in the treatment and collection of the permitted discharge.
- (G) For Total Toxic Organics (TTO) monitoring, in accordance with 22a-430-4(I) of the RCSA and 40 CFR 433 (Metal Finishing), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved *Solvent Management Plan*. This certification statement shall be as follows:

"Based on my inquiry of the person or persons responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report which required such certification. I further certify that this facility is implementing the solvent management plan approved by the Commissioner."

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

- (A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing) within 30 days of the exceedance.
- (B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("POTW"), including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in Section 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.

This permit is hereby issued on

DRAFT

MACKY MCCLEARY
Deputy Commissioner

MM:CMG
copy: City of West Haven WPCF

FACT SHEET

SPDES PERMIT RENEWAL

APPLICANT	SEABOARD METAL FINISHING CO., INC.
SPDES PERMIT NO.	SP0000127
APPLICATION NO.	201003863
DATE APPLICATION RECEIVED	June 11, 2010
FACILITY ID.	156-022
LOCATION ADDRESS	50 Fresh Meadow Road West Haven, Connecticut 06516
FACILITY CONTACT	Steven Tarantino, President Office Phone: 203-933-1603 FAX: 203-932-1980 sdt@pipeline.com
MAILING ADDRESS	50 Fresh Meadow Road West Haven, Connecticut 06516
DMR CONTACT	Steven Tarantino
BILLING CONTACT	Steven Tarantino
PERMIT TERM	5 years
PERMIT CATEGORY	Significant Industrial User: ☒ Subject to Categorical Pretreatment Standard(s): 40 CFR 433 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 CODE(S)	3471 (Electroplating, Plating, Polishing, Anodizing & Coloring)
PERMIT TYPE	Renewal
OWNERSHIP	Private
POTW THAT RECEIVES THE DISCHARGE	City of West Haven Water Pollution Control Facility [New Haven Harbor]
DEP STAFF ENGINEER	Christine Gleason (860/424-3278) christine.gleason@ct.gov

PERMIT FEES

Application Filing Fee: \$1,300. Paid on June 11, 2010

Application Processing Fee: \$13,650 (Invoice 210125). Paid on July 24, 2012

Annual Fee:

DISCHARGE CODE	WASTEWATER CATEGORY (per 22a-430-7)	MAXIMUM GPD or CATEGORY	DSN	ANNUAL FEE (per 22a-430-7)
501035Z	Metal Finishing to POTW (Electroplating, Electropolishing, Cleaning, and Passivating rinsewaters; Air scrubber wastewater; Laboratory wastewater; Floorwash water; Carbon filter rinsewater; Container rinsewater; Stormwater from the roof near the scrubber; Stormwater from the storage tank containment area; Boiler blowdown; Air compressor condensate/blowdown; Sandfilter backwash; Filter press filtrate)	>10,000	001-1	8,425
TOTAL				\$8,425.00

I. APPLICANT

Seaboard Metal Finishing Co., Inc. (“Seaboard”) in West Haven is seeking to renew its SPDES permit (Permit No. SP0000127 issued on December 13, 2005) for authorization of the discharge of treated wastewater associated with its metal finishing operations. On June 11, 2010, the Department of Environmental Protection (now the Department of Energy and Environmental Protection, “Department”) received an application (Application No. 201003863) for the subject SPDES permit renewal. This application was noticed in the *New Haven Register* on June 14, 2010. On July 30, 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
001-1	70,000	80,000	Electroplating, electropolishing, cleaning, and passivating rinsewaters; Air scrubber wastewater; Laboratory wastewater; Floorwash water; Carbon filter rinsewater; Container rinsewater; Stormwater from the roof near the scrubber; Stormwater from the storage tank containment area; Boiler blowdown; Air compressor condensate/blowdown; Sandfilter backwash; Filter press filtrate	Chemical Precipitation, Neutralization, Filtration	City of West Haven WPCF
001-A	---	---	Chromium-bearing wastewaters	Chromium reduction	DSN 001-1
001-B	---	---	Cyanide-bearing wastewaters	Cyanide destruction	DSN 001-1

II. BACKGROUND

Seaboard is a job shop that is engaged in various types of metal finishing operations. The wastewater associated with these operations, and other related on-site operations, is treated and discharged (via DSN 001-1) to the City of West Haven’s Water Pollution Control Facility by way of Permit No. SP0000127.

III. ISSUES RELATED TO THE APPLICATION

A. INDIAN LAND

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

B. COASTAL BOUNDARY

The subject site is located within a coastal area, but not within a coastal boundary. The subject activity involves the renewal of a sewer discharge permit and would not be expected to impact coastal resources.

C. ENDANGERED OR THREATENED SPECIES

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

D. AQUIFER PROTECTION AREAS

The project site is not located within a town that is required to establish Aquifer Protection Areas.

E. CONSERVATION OR PRESERVATION RESTRICTION

The property on which the project site is located is not subject to a conservation or preservation restriction.

F. MS4

The application does not include stormwater discharges to a Medium Municipal Separate Storm Sewer System (MS4). [Stormwater from the site that can become contaminated through contact with the facility's operations/equipment is directed into Seaboard's wastewater treatment system].

G. PUBLIC WATER SUPPLY SHED

The project site is not located within a public water supply watershed.

IV. NATURE OF THE BUSINESS GENERATING THE DISCHARGE

Seaboard is in the business of metal finishing. The SIC code, as provided by the applicant, is 3471 (Electroplating, Plating, Polishing, Anodizing & Coloring)

V. FACILITY DESCRIPTION

Seaboard is located in mainly commercial/industrial area in West Haven and has operated as a metal finishing job shop since 1972. The company performs metal finishing and other related finishing and cleaning processes for the military, medical, and automotive industries. The metal finishing operations include: electroplating (copper, nickel, tin, chromium), electroless plating (nickel), electropolishing, chemical polishing, and passivation. Ancillary operations include: cleaning and black oxide process. The concentrated baths associated with these operations are shipped off-site when spent; the rinsewaters are treated on-site. In addition, wastewater generated from other ancillary operations on-site (e.g., laboratory wastewater, floorwash wastewater, air scrubber wastewater, etc.) is also treated on-site. The effluent from the treatment system is discharged to the City of West Haven's Water Pollution Control Facility via one sewer discharge connection point (DSN 001-1). [See Attachment 1 for a location map, Attachment 2 for a process schematic, and Attachment 3 for a line diagram].

VI. THE ON-SITE WASTEWATER TREATMENT SYSTEM

The following rinsewaters are segregated and pre-treated prior to discharge into the primary wastewater treatment system on-site:

- Chromium-bearing rinsewaters are pre-treated in order to reduce the chromium from the hexavalent to the trivalent form. The chromium reduction system is a flow-through system; treatment is accomplished using sulfuric acid and sodium metabisulfite. The sample taken to determine compliance with the hexavalent chromium permit limit (DSN 001-A) is taken immediately following treatment in the chromium reduction tank. Following treatment, the treated wastewater flows into the Neutralization Tank for further treatment.
- Cyanide-bearing rinsewaters are batch treated in a two-stage system using sodium hypochlorite. Treatment occurs in two 2,000 gallon treatment tanks. A control system has recently been installed to allow for automated/simultaneous treatment for amenable cyanide. Approximately 300 to 1300 gallons per day of cyanide-bearing wastewater is treated. The sample taken to determine compliance with the free (amenable) cyanide permit limit (DSN 001-B) is taken from either one of the cyanide destruction tanks following treatment. Following treatment, the wastewater flows into the Neutralization Tank for further treatment.

All pre-treated wastewaters, as well as the other rinsewaters and ancillary wastestreams, are directed into the 1,600 gallon Neutralization Tank for pH adjustment. Wastewater from the Neutralization Tank gravity flows to a 600 gallon Flocculation Tank. Following addition of flocculant, the wastewater is directed to a 15,000 gallon Clarifier where solids are allowed to settle out. Sludge from the system is de-watered and shipped off-site. The effluent from the Clarifier is polished/filtered and is then discharged into the sanitary sewer via DSN 001-1. The design flow of the treatment system is 108,000 gpd. There is a discharge from the system approximately 8 hours per day.

VII. EFFLUENT QUALITY DATA

See Attachment 4 for quality data exists.

VIII. EFFLUENT & REPORTING VIOLATIONS

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
January 2009	001-B	Cyanide, Free	Average Monthly Maximum, Daily	0.32 mg/L 0.86 mg/L	1.4 mg/L 3.0 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☒ Unknown ☐ None provided ☐ Other					
REASON: Unknown.					

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
August 2009	001-A	Chromium, Hexavalent	Average Monthly Maximum, Daily	0.1 mg/L 0.2 mg/L	0.63 mg/L 2.50 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☐ Unknown ☐ None provided ☒ Other					
REASON: Unknown.					

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
July 2010	001-B	Cyanide, Free	Average Monthly Maximum, Daily	0.32 mg/L 0.86 mg/L	0.86 mg/L 2.0 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☒ Unknown ☐ None provided ☐ Other					
REASON: Suspected to be a false positive due to excess amounts of sulfides in the sample					

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
August 2010	001-B	Cyanide, Free	Average Monthly Maximum, Daily	0.32 mg/L 0.86 mg/L	0.56 mg/L 1.1 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☒ Unknown ☐ None provided ☐ Other					
REASON: Suspected to be a false positive due to excess amounts of sulfides in the sample					

IX. OUTSTANDING ENFORCEMENT (RELATED TO WASTEWATER DISCHARGES):

NOV WR IN 10 026 was issued to Seaboard on December 22, 2010 because of a permit limit exceedence for free cyanide for DSN 001-B that occurred in July 2010 and August 2010. NOV WR IN 10 026 was closed on May 13, 2011.

X. SPILL HISTORY

No spills in the last five years.

XI. EFFLUENT GUIDELINES

Seaboard is a metal finishing job shop that began operations in the 1970s. It has been, and is currently engaged in, electroplating, electroless plating, electropolishing, chemical polishing, and passivation, as well as certain ancillary operations. In Seaboard's current SPDES permit, the treated effluent from its metal finishing operations is noted to be subject to 40 CFR 413 (Electroplating). However, the standards at 40 CFR 413 apply only to job shop electroplaters that were in existence before the New Source date for Metal Finishing (August 31, 1982) who have not made significant changes to their facility (i.e., such changes that would make it a "new source"). While Seaboard was in existence prior to this date, it has made changes to its facility since this date that are within the definition of a new source (i.e., it installed new lines, rebuilt and moved lines, converted existing lines to do new operations, etc.). Specifically, from 1991-1995,

Seaboard made the following modifications to its facility which were designed to minimize the generation of pollutants: consolidated the nickel plating processes on the Rack Plating Line to reduce water usage and drag-out; installed spray rinses on the Rack Plating Line to reduce drag-out of chromium-bearing wastewater; installed a system to segregate cleaning and copper plating baths preventing the drag-out of cyanide to the cleaners and their rinses; installed counterflow rinses on plating lines; close-looped the rinsewaters on the Automatic Nickel Line; reduced drag-out in the Automatic Nickel Line through improved computerization. More recently, Seaboard installed an Aluminum Cleaning Line and a Trivalent Chromium Line; these lines were assembled from former lines used in the facility. Because changes have been made to the configuration and capabilities of the operations at Seaboard after the deadline date of August 31, 1982, the Pretreatment Standards for New Sources (PSNS) at 40 CFR 433 (Metal Finishing) apply to the discharge, DSN 001-1.

XII. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

RESOURCES USED TO DRAFT PERMIT			DISCHARGE POINT(S)
☒	Federal Effluent Limitation Guideline (ELG)	40 CFR 433 (Metal Finishing)	DSN 001-1
☐	Performance Standards		
☐	Federal Development Document		
☐	Treatability Manual		
☐	Department File Information		
☒	Other	40 CFR 403.3(m)	DSN 001-1

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		REGULATION	DISCHARGE POINT(S)
☐	Pretreatment Standards for Existing Sources (PSES)		
☒	Pretreatment Standards for New Sources (PSNS)	40 CFR 433.17	DSN 001-1 DSN 001-B
☒	Case-by-Case Determination using Best Professional Judgment (BPJ)	40 CFR 403 RCSA 22a-430-4(s)(2)	DSN 001-1 DSN 001-A

- A. **WASTESTREAMS AUTHORIZED FOR DISCHARGE UNDER DSN 001-1:** Electroplating, electropolishing, cleaning, and passivating rinsewaters; Air scrubber wastewater; Laboratory wastewater; Floorwash water; Carbon filter rinsewater; Container rinsewater; Stormwater from the roof near the scrubber; Stormwater from the storage tank containment area; Boiler blowdown; Air compressor condensate/blowdown; Sandfilter backwash; Filter press filtrate
- B. **MONITORING PARAMETERS & LIMITS:** The discharge, DSN 001, is subject to the limits at 40 CFR 433.17 and RCSA Section 22a-430-4(s)(2). The limits at 40 CFR 433.17 apply to process wastewaters. Because the discharge consists of both process wastewaters and non-process wastewaters, the limits at 40 CFR 433.17 and RCSA 22a-430-4(s) were adjusted for the non-process wastewaters. [See Attachment 5]. Where more than one limit applies, the more stringent of the limits was selected as the permit limit. See the tables below for a summary of the limits:

DSN 001-1

PARAMETER	40 CFR 433.17		BPJ	RCSA 22a-430-4(s)(2)		
	Average Monthly (mg/L)	Maximum Daily (mg/L)		Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)
Cadmium, Total	0.07	0.11	0.16	0.07	0.11	0.16
Chromium, Total	1.70	2.76	3.84	1.0	2.0	3.0
Copper, Total	2.06	3.37	4.14	1.0	2.0	3.0
Cyanide, Total	0.65	1.20	1.80	0.65	1.2	1.8
Cyanide, Amenable	0.32	0.86	1.29	0.1	0.2	0.3
Lead, Total	0.43	0.69	1.04	0.1	0.5	0.75
Nickel, Total	2.37	3.97	5.96	1.0	2.0	3.0
Silver, Total	0.24	0.43	0.64	0.1	0.5	0.75
Tin, Total				2.0	4.0	6.0
Total Suspended Solids						
Total Toxic Organics		2.12	3.20			
Zinc, Total	1.47	2.60	3.90	1.0	2.0	3.0

DSN 001-A

PARAMETER	40 CFR 433.17			RCSA 22a-430-4(s)(2)		
	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)
Hexavalent Chromium				0.1	0.2	0.3

DSN 001-B

PARAMETER	40 CFR 433.17		BPJ	RCSA 22a-430-4(s)(2)		
	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)	Average Monthly (mg/L)	Maximum Daily (mg/L)	Instantaneous (mg/L)
Cyanide, Amenable	0.32	0.86	1.29			

Comments on specific parameters:

- Monitoring DSN 001-1 for Oil & Grease has been eliminated since there have been no detections of Oil & Grease in the effluent in the last five years.
- The limits for Total Suspended Solids for DSN 001-1 in the existing permit will be carried over to this permit.

C. **MONITORING FREQUENCY:** The *Monitoring Schedule* set forth in RCSA 22a-430-3 prescribes a frequency of “weekly” for DSN 001-1 based on the category of discharge (“Metal Finishing”) and the average permitted monthly flow (>10,000 gpd). Therefore, the metal finishing monitoring parameters that are expected to be present in the discharge will be monitored weekly; monitoring for the other parameters is determined on a case-by-case basis.

D. **TOTAL TOXIC ORGANICS (TTOs):** The analytical testing conducted on DSN 001-1 for the permit renewal application indicates that some of the volatile organics on the TTO list were detected in the discharge (e.g., benzene, chloroform, dichlorobromomethane, toluene); the sum were all below the regulatory limit. The Permittee has certified that no TTOs are used on-site. It is unclear how the volatiles organics are getting into the discharge. However, the Permittee feels that the source of the volatiles could be from residual material on the incoming parts. Because the source of the TTOs is not coming directly from the Permittee’s activities, a certification statement in lieu of testing is not appropriate. Therefore, the Permittee shall conduct baseline testing (twice per year) in order to monitor the level of TTOs in the discharge.

**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 **SEABOARD METAL FINISHING CO., 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 system to treat the discharge would protect the waters of the state from pollution 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 treated to meet the applicable effluent limitations and will require periodic monitoring to demonstrate that the discharge will not cause pollution.

APPLICANT'S PROPOSAL

Seaboard Metal Finishing Co., Inc. will be authorized to discharge up to 80,000 gallons per day of wastewater associated with its metal finishing operations into the City of West Haven’s Water Pollution Control Facility. The permitted discharge will also consist of wastewater from ancillary operations at the facility.

The name and mailing address of the permit applicant are: Seaboard Metal Finishing Co., Inc., 50 Fresh Meadow Road, West Haven, Connecticut 06516.

The activity takes place at: 50 Fresh Meadow Road, West Haven, Connecticut.

REGULATORY CONDITIONS

Types of Treatment

DSN 001-1: (Electroplating, electropolishing, cleaning, and passivating rinsewaters; Air scrubber wastewater; Laboratory wastewater; Floorwash water; Carbon filter rinsewater; Container rinsewater; Stormwater from the roof near the scrubber; Stormwater from the storage tank containment area; Boiler blowdown; Air compressor condensate/blowdown; Sandfilter backwash; Filter press filtrate): Chemical Precipitation; Neutralization; Settling; Filtration

DSN 001-A: (Chromium-bearing rinsewaters): Chromium reduction

DSN 001-B: (Cyanide-bearing rinsewaters): Cyanide destruction

Effluent Limitations

This permit contains effluent limitations consistent with: 1) Federal Pretreatment Standards for New 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.

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. **201003863**

PERMIT ID NO. **SP0000127**

FACILITY ID NO. **156-022**

Interested persons may obtain copies of the application from Steven Tarantino, President, Seaboard Metal Finishing Co., Inc., 50 Fresh Meadow Road, West Haven, Connecticut (Phone: 203-966-1603).

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: