



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

PRETREATMENT PERMIT

Draft

issued to

Porcelen, Limited, Connecticut, LLC
129 Leeder Hill Drive
Hamden, CT 06514

Location Address:

129 Leeder Hill Drive
Hamden, CT 06514

Permit ID: SP0000656

Permit Expires

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement (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) Porcelen, Limited, Connecticut, LLC, ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsection (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

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

Section 22a-430-4 Procedures and Criteria

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

- (f) Draft Permits, Fact Sheets
 - (g) Public Notice, Notice of Hearing
 - (h) Public Comments
 - (i) Final Determination
 - (j) Public Hearings
 - (k) Submission of Plans and Specifications. Approval.
 - (l) Establishing Effluent Limitations and Conditions
 - (m) Case by Case Determinations
 - (n) Permit issuance or renewal
 - (o) Permit Transfer
 - (p) Permit revocation, denial or modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements for Metals and Cyanide
 - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least 30 days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the Regulations of Connecticut State Agencies.
- (H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the Connecticut General Statutes).

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.
- "BATCH" means a finite volume of wastewater that has been processed through the approved treatment system before being discharged.
- "Composite" for the purposes of this permit composite means grab samples collected at the beginning, middle and end of discharge from the batch treatment system and combined for analysis.
- "Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.
- "Daily Quantity" means the quantity of waste generated during an operating day.

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

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

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

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

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

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

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

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

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S DECISION

- (A) The Commissioner has made a final determination and found that the continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's decision is based on Application No. 200400063 for permit reissuance received on January 14, 2004 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including [**LAST DAY OF MONTH, MONTH OF PERMIT REISSUANCE**], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000656, issued by the Commissioner to the Permittee on July 20, 1999, the previous application submitted by the Permittee on May 19, 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. SP0000656, issued by the Commissioner to the Permittee on July 20, 1999.
- (2) From [**FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE**] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000656, issued by the Commissioner to the Permittee on [**DATE OF PERMIT REISSUANCE**], Application No. 200400063 received by the Department on January 14, 2004, 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. SP0000656, issued by the Commissioner to the Permittee on [**DATE OF PERMIT REISSUANCE**].
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the Connecticut General Statutes or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or Connecticut General Statutes or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The discharge shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A								
Discharge Serial Number: 001-1						Monitoring Location: 1		
Wastewater Description: Cleaning, rinsing of chromate dips and caustic cleaning operation wastewaters.								
Monitoring Location Description: Batch wastewater treatment tank effluent pipe.								
Discharge is to: The City of New Haven POTW.								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency ²	Sample Type or measurement to be reported
Cadmium, Total	mg/l	0.1	0.2	Semi-Annual	Composite	0.3	NR	NA
Chromium, Total	mg/l	1.0	2.0	Twice per Month	Composite	3.0	NR	NA
Chromium, Hexavalent	mg/l	0.1	0.2	Twice per Month	Composite	0.3	NR	NA
Copper, Total	mg/l	1.0	2.0	Twice per Month	Composite	3.0	NR	NA
Cyanide, Amenable	mg/l	0.1	0.2	Semi-Annual	Grab Sample Average ⁴	0.3	NR	NA
Flow Rate (Average Daily) ¹	gpd	-----	NA	Continuous	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	7,200	Continuous	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	-----	Monthly	Daily Flow	NA	NR	NA
Lead, Total	mg/l	0.1	0.2	Twice per Month	Composite	0.3	NR	NA
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 – 10.0	Monthly	RDS
Total Suspended Solids	mg/l	-----	-----	Monthly	Composite	NA	NR	NA
Total Toxic Organics ³	mg/l	NA	NA	NR	NA	2.13	Monthly	Grab
Zinc, Total	mg/l	1.0	2.0	Twice per Month	Composite	3.0	NR	NA
Table Footnotes:								
Footnotes:								
¹ For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month.								
² The first entry in this column is the ‘Sample Frequency’. If this entry is not followed by a ‘Reporting Frequency’ and the ‘Sample Frequency’ is more frequent than monthly then the ‘Reporting Frequency’ is monthly. If the ‘Sample frequency’ is specified as monthly, or less frequent, then the ‘Reporting Frequency’ is the same as the ‘Sample Frequency’.								
³ Please refer to Section 5, Paragraph (G).								
⁴ Grab Sample Average for this discharge means the arithmetic average of all grab sample analyses. Grab samples shall be collected at the beginning, middle and end of discharge from the batch treatment system.								

- (B) All samples shall be comprised of only those wastewaters described in this schedule; therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by, the Department of Energy and Environmental Protection personnel, the Permittee, or other parties.

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

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

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

- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g. Monthly, quarterly, etc.) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.

(E) NetDMR Reporting Requirements

1. Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit discharge monitoring reports (DMRs) and other required reports through a secure internet connection. Unless otherwise approved in writing by the Commissioner, no later than one-hundred and eighty (180) days after the issuance of this permit the Permittee shall begin reporting electronically using NetDMR. Specific requirements regarding subscription to NetDMR and submittal of data and reports in hard copy form and for submittal using NetDMR are described below:

a. Submittal of *NetDMR Subscriber Agreement*

On or before fifteen (15) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's discharge monitoring reports ("Signatory Authority") as described in RCSA Section 22a-430-3(b)(2) shall contact the Department at dep.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 dep.netdmr@ct.gov:

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

(F) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority(ies) ("WPCA") involved in the treatment and collection of the permitted discharge.

(G) For Total Toxic Organics (TTO) monitoring, in accordance with 22a-430-4(l) of the RCSA and, 40 CFR 413 (Electroplating), 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

In accordance with 40 CFR §403.8(f)(2)(viii), the Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee that is a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six (66%) percent or more of all measurements taken for the same pollutant parameter during a six-month period exceed (by any magnitude) the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three (33%) or more of all of the measurements taken for the same pollutant parameter during a six-month period equal or exceed the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s) multiplied by 1.4 for BOD, TSS, fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within 45 days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within 90 days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction, or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR §403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **BMPs:** Any other violation or group of violations, which may include a violation of Best Management Practices, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

DRAFT

Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

MM/EMW

cc: LOCAL POTW

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Porcelen, Limited, Connecticut, LLC

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0000656

APPLICATION #: 200400063

<u>Mailing Address:</u>						<u>Location Address:</u>					
Street:	129 Leeder Hill Drive					Street:	129 Leeder Hill Drive				
City:	Hamden	ST:	CT	Zip:	06514	City:	Hamden	ST:	CT	Zip:	06514
Contact Name:	Michael Walsh					DMR Contact	Michael Walsh				
Phone No.:	(203) 248-6346					Phone No.:	(203) 248-6346				
Contact E-mail:						DMR Contact E-mail:					

PERMIT INFORMATION

DURATION 5 YEAR X 10 YEAR ____ 30 YEAR ____

TYPE New ____ Reissuance X Modification ____

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

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

NPDES MAJOR(MA) ____
NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) X
NPDES or PRETREATMENT MINOR (MI) ____

PRETREAT SIGNIFICANT INDUS USER(SIU) X
PRETREAT CATEGORICAL (CIU) X
Note: If it's a CIU then check off SIU

POLLUTION PREVENTION MANDATE ____ ENVIRONMENTAL EQUITY ISSUE ____

SIC CODE 2851

SOLVENT MANAGEMENT PLAN

Was the facility operating under an approved solvent management plan (SMP)? Yes X No ____ NA ____
If yes, indicate date issued: March 26, 2012

COMPLIANCE ISSUES

COMPLIANCE SCHEDULE YES NO X

POLLUTION PREVENTION ____ TREATMENT REQUIREMENT ____ WATER CONSERVATION ____

WATER QUALITY REQUIREMENT ____ REMEDIATION ____ OTHER ____

IS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? NO X YES ____

OWNERSHIP CODEPrivate X Federal ___ State ___ Municipal (town only) ___ Other publicDEEP STAFF ENGINEER Ewa Wozniak**PERMIT FEES**

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

FOR SEWER DISCHARGES

Discharge to The City of New Haven POTW via the Town of Hamden collection system. The facility ID. of the POTW is 093-001.

NATURE OF BUSINESS GENERATING DISCHARGE

Porcelen, Limited, Connecticut, LLC manufactures high quality aluminum fencing, coated coil and other coated materials.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: This discharge is made up of a maximum flow of 7,200 gallons per day of electroplating wastewaters. Treatment consists of neutralization, hexavalent chromium reduction, flocculation, clarification and filtration.

RESOURCES USED TO DRAFT PERMIT

- X Federal Effluent Limitation Guideline 40 CFR Part 413.54 Subpart E
Electroplating
- ___ Performance Standards
- ___ Federal Development Document
name of category
- ___ Treatability Manual
- X Department File Information
- ___ Connecticut Water Quality Standards
- ___ Anti-degradation Policy
- ___ Coastal Management Consistency Review Form (See Other Comments)
- ___ Other - Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- X Case-by-Case Determination using Best Professional Judgement
DSN 001-1: Total Suspended Solids (TSS), pH, TTO (MIL), total cadmium
- X Section 22a-430-4(s) of the Regulations of Connecticut State Agencies

GENERAL COMMENTS

In developing the permit's concentration limits, EPA Electroplating Categorical Limits (40 CFR Part 413) and Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies limits were compared. The Connecticut limits were found to be more stringent and thus incorporated in the permit.

OTHER COMMENTS

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

The limits for total copper, chromium, lead, and zinc are consistent with section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies (RCSA).

Up to 80% of the company's wastewater contains hexavalent chromium. Therefore, the company treats all of the wastewater for hexavalent chromium. Limits for total and hexavalent chromium are at the final discharge.

The monitoring frequency for amenable cyanide is transferred from the previous permit. Although the company does not have any cyanide bearing compounds on site, the Department decided to include limits for amenable cyanide consistent with section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies (RCSA) during this permit reissuance cycle.

The company is subject to EPA Electroplating Categorical Limits (40 CFR Part 413.54) not Metal Finishing Categorical Limits (40 CFR Part 433) because the company was in existence before the promulgation of the New Source date for 40 CFR Part 433 (August 31, 1982 – indirect discharge).

The limits for total cadmium are transferred from the previous permit. They are based on Best Professional Judgement. These limits are more stringent than the typical limits found in section 22a-430-4(s) of the Regulations of Connecticut State Agencies (RCSA) however the company's historical data indicates that the company will not have a problem meeting the more stringent limits.

Monitoring for total suspended solids (TSS) is incorporated during this permit reissuance to ensure that the company's treatment system is operating properly.

Since this application does not include any new exterior construction at the facility, the applicant was not required to submit a CAM consistency form. This facility is considered to be consistent with the CAM Act.

Historically, the company's treatment system design included a filter press, which was never used. Therefore, during this permit reissuance, the treatment system is modified to remove the filter press. The company is able to meet all the permit requirements without the use of the filter press.

**NOTICE OF TENTATIVE DETERMINATION
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 determination to renew a permit based on an application submitted by **Porcelen, Limited, Connecticut, LLC** ("the applicant") under section 22a-430 of the Connecticut General Statutes for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative determination that modification of the existing system or installation of a new system 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 periodic monitoring to demonstrate that the discharge will not cause pollution.

APPLICANT'S PROPOSAL

Porcelen, Limited, Connecticut, LLC presently discharges a maximum of 7,200 gallons per day of treated wastewaters to the City of New Haven Water Pollution Control Facility from operations at a metal finishing facility.

The name and mailing address of the permit applicant are: Porcelen, Limited, Connecticut, LLC, 129 Leeder Hill Drive, Hamden, CT 06514.

The activity takes place at: 129 Leeder Hill Drive, Hamden, CT 06514.

The proposed activity is within the coastal area as defined in C.G.S. Section 22a-94. Pursuant to C.G.S. Section 22a-98, the applicant must demonstrate that the activities are consistent with all applicable goals and policies in C.G.S. Section 22a-92, and that such activities incorporate all reasonable measures mitigating any adverse impacts on coastal resources and future water-dependent development activities.

REGULATORY CONDITIONS

Type of Treatment

DSN 001-1: neutralization, hexavalent chromium reduction, flocculation, clarification and filtration.

Effluent Limitations

This permit contains effluent limitations consistent with a Case by Case Determination using the criteria of Best Professional Judgement, Pretreatment Standards for Existing Sources (PSES), Section 22a-430-4(s) of the Regulations of Connecticut State Agencies and which will protect the waters of the state from pollution when all the conditions of this permit have been met.

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

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 (section 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. 200400063

PERMIT ID NO. SP0000656

Interested persons may obtain copies of the application from Michael Walsh, Porcelen, Limited, Connecticut, LLC, 129 Leeder Hill Drive, Hamden, CT 06514, (203) 248-6346.

The application is available for inspection by contacting Ewa Wozniak (860) 424-3018, at the Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, 79 Elm Street, Hartford, CT, 06106-5127 from 8:30 - 4:30, Monday through Friday.

Any interested person may request in writing that his or her name be put on a mailing list to receive 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 Ewa Wozniak, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT, 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby, and shall hold a hearing upon receipt of a petition signed by at least twenty-five 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, CT, 06106-5127. Petitions cannot be sent by fax or email. Additional information can be found at www.ct.gov/dep/adjudications.

The Department of Energy and Environmental Protection is an affirmative action/equal opportunity employer and service provider. In conformance with the Americans with Disabilities Act, DEEP makes every effort to provide equally effective services for persons with disabilities. Individuals with disabilities who need this information in an alternative format, to allow them to benefit and/or participate in the agency's programs and services, should call 860-424-3035 or e-mail the ADA Coordinator, at DEP.aao@CT.Gov. Persons who are hearing impaired should call the State of Connecticut relay number 711.

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

Dated: 4/24/2012