

PRETREATMENT PERMIT

issued to

Location Address:

R.S.A. CORP.
36 Old Sherman Turnpike
Danbury, CT 06810

36 Old Sherman Turnpike
Danbury, CT 06810

Permit ID: SP0001473

Permit Expires: DRAFT

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) R.S.A. CORP., ("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)
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- (p) Spill Prevention and Control
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- (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.
- "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.

"gr/d" means grams per day.

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. 201106313 for permit reissuance received on August 23, 2011 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. SP0001473 issued by the Commissioner to the Permittee on February 20, 2007, the previous application submitted by the Permittee on May 16, 2003 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. SP0001473, issued by the Commissioner to the Permittee on February 20, 2007.

(2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0001473, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 201106313 received by the Department on August 23, 2011 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. SP0001473, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the 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: Organic chemical manufacturing wastewater, air scrubber wastewater, stormwater from containment areas								
Monitoring Location Description: Sample port on sewer outlet pipe								
Discharge is to: The City of Danbury Water Pollution Control Facility								
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 ¹	Sample Type or measurement to be reported
Acenaphthene	ug/l	19	47	Semi-annual	Grab Sample Average ²	47	NR	NA
Acenaphthene	gr/d	0.30	0.75	Semi-annual	Grab Sample Average ²	NA	NR	NA
Anthracene	ug/l	19	47	Semi-annual	Grab Sample Average ²	47	NR	NA
Anthracene	gr/d	0.30	0.75	Semi-annual	Grab Sample Average ²	NA	NR	NA
Benzene	ug/l	57	134	Twice per month	Grab Sample Average ²	134	NR	NA
Benzene	gr/d	0.91	2.13	Twice per month	Grab Sample Average ²	NA	NR	NA
Bis (2-ethyhexyl) phthalate	ug/l	95	258	Semi-annual	Grab Sample Average ²	258	NR	NA
Bis (2-ethyhexyl) phthalate	gr/d	1.51	4.10	Semi-annual	Grab Sample Average ²	NA	NR	NA
Carbon Tetrachloride	ug/l	142	380	Semi-annual	Grab Sample Average ²	380	NR	NA
Carbon Tetrachloride	gr/d	2.26	6.04	Semi-annual	Grab Sample Average ²	NA	NR	NA
Chlorobenzene	ug/l	142	380	Semi-annual	Grab Sample Average ²	380	NR	NA
Chlorobenzene	gr/d	2.26	6.04	Semi-annual	Grab Sample Average ²	NA	NR	NA
Chloroethane	ug/l	110	295	Twice per month	Grab Sample Average ²	295	NR	NA
Chloroethane	gr/d	1.75	4.69	Twice per month	Grab Sample Average ²	NA	NR	NA
Chloroform	ug/l	111	325	Twice per month	Grab Sample Average ²	325	NR	NA
Chloroform	gr/d	1.76	5.17	Twice per month	Grab Sample Average ²	NA	NR	NA
Di-n-butyl phthalate	ug/l	20	43	Semi-annual	Grab Sample Average ²	43	NR	NA
Di-n-butyl phthalate	gr/d	0.32	0.68	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,2- Dichlorobenzene	ug/l	196	794	Semi-annual	Grab Sample Average ²	794	NR	NA
1,2- Dichlorobenzene	gr/d	3.12	12.62	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,3- Dichlorobenzene	ug/l	142	380	Semi-annual	Grab Sample Average ²	380	NR	NA
1,3- Dichlorobenzene	gr/d	2.26	6.04	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,4 - Dichlorobenzene	ug/l	142	380	Semi-annual	Grab Sample Average ²	380	NR	NA
1,4 - Dichlorobenzene	gr/d	2.26	6.04	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,1- Dichloroethane	ug/l	22	59	Semi-annual	Grab Sample Average ²	59	NR	NA
1,1- Dichloroethane	gr/d	0.35	0.94	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,2 -Dichloroethane	ug/l	180	574	Semi-annual	Grab Sample Average ²	574	NR	NA
1,2- Dichloroethane	gr/d	2.86	9.13	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,1- Dichloroethylene	ug/l	22	60	Semi-annual	Grab Sample Average ²	60	NR	NA

1,1- Dichloroethylene	gr/d	0.35	0.95	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,2 – trans - Dichloroethylene	ug/l	25	66	Semi-annual	Grab Sample Average ²	66	NR	NA
1,2 – trans - Dichloroethylene	gr/d	0.40	1.05	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,2 - Dichloropropane	ug/l	196	794	Semi-annual	Grab Sample Average ²	794	NR	NA
1,2 - Dichloropropane	gr/d	3.12	12.62	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,3 - Dichloropropylene	ug/l	196	794	Semi-annual	Grab Sample Average ²	794	NR	NA
1,3 - Dichloropropylene	gr/d	3.12	12.62	Semi-annual	Grab Sample Average ²	NA	NR	NA
Diethyl phthalate	ug/l	46	113	Semi-annual	Grab Sample Average ²	113	NR	NA
Diethyl phthalate	gr/d	0.73	1.80	Semi-annual	Grab Sample Average ²	NA	NR	NA
Dimethyl phthalate	ug/l	19	47	Semi-annual	Grab Sample Average ²	47	NR	NA
Dimethyl phthalate	gr/d	0.30	0.75	Semi-annual	Grab Sample Average ²	NA	NR	NA
4,6 – Dinitro – o- cresol	ug/l	78	277	Semi-annual	Grab Sample Average ²	277	NR	NA
4,6 – Dinitro – o- cresol	gr/d	1.24	4.40	Semi-annual	Grab Sample Average ²	NA	NR	NA
Ethylbenzene	ug/l	142	380	Semi-annual	Grab Sample Average ²	380	NR	NA
Ethylbenzene	gr/d	2.26	6.04	Semi-annual	Grab Sample Average ²	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	5,940	Twice per Month	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	5,940	Monthly	Daily Flow	NA	NR	NA
Flow Rate (Average Daily) ¹	gpd	4,200	NA	Monthly	Daily Flow	NA	NR	NA
Fluoranthene	ug/l	22	54	Semi-annual	Grab Sample Average ²	54	NR	NA
Fluoranthene	gr/d	0.35	0.94	Semi-annual	Grab Sample Average ²	NA	NR	NA
Fluorene	ug/l	19	47	Semi-annual	Grab Sample Average ²	47	NR	NA
Fluorene	gr/d	0.30	0.75	Semi-annual	Grab Sample Average ²	NA	NR	NA
Hexachlorobenzene	ug/l	196	794	Semi-annual	Grab Sample Average ²	794	NR	NA
Hexachlorobenzene	gr/d	3.12	12.62	Semi-annual	Grab Sample Average ²	NA	NR	NA
Hexachlorobutadiene	ug/l	142	380	Semi-annual	Grab Sample Average ²	380	NR	NA
Hexachlorobutadiene	gr/d	2.26	6.04	Semi-annual	Grab Sample Average ²	NA	NR	NA
Hexachloroethane	ug/l	196	794	Semi-annual	Grab Sample Average ²	794	NR	NA
Hexachloroethane	gr/d	3.12	12.62	Semi-annual	Grab Sample Average ²	NA	NR	NA
Methyl Chloride	ug/l	110	295	Twice per month	Grab Sample Average ²	295	NR	NA
Methyl Chloride	gr/d	1.75	4.69	Twice per month	Grab Sample Average ²	NA	NR	NA
Methylene Chloride	ug/l	36	170	Twice per month	Grab Sample Average ²	170	NR	NA
Methylene Chloride	gr/d	0.57	2.70	Twice per month	Grab Sample Average ²	NA	NR	NA
Naphthalene	ug/l	19	47	Semi-annual	Grab Sample Average ²	47	NR	NA
Naphthalene	gr/d	0.30	0.75	Semi-annual	Grab Sample Average ²	NA	NR	NA
Nitrobenzene	ug/l	2,237	6,402	Semi-annual	Grab Sample Average ²	6402	NR	NA
Nitrobenzene	gr/d	35.57	101.78	Semi-annual	Grab Sample Average ²	NA	NR	NA
2 - Nitrophenol	ug/l	65	231	Semi-annual	Grab Sample Average ²	231	NR	NA
2 - Nitrophenol	gr/d	1.03	3.67	Semi-annual	Grab Sample Average ²	NA	NR	NA
4 - Nitrophenol	ug/l	162	576	Semi-annual	Grab Sample Average ²	576	NR	NA
4 - Nitrophenol	gr/d	2.58	9.16	Semi-annual	Grab Sample Average ²	NA	NR	NA
Phenanthrene	ug/l	19	47	Semi-annual	Grab Sample Average ²	47	NR	NA

Phenanthrene	gr/d	0.30	0.75	Semi-annual	Grab Sample Average ²	NA	NR	NA
Pyrene	ug/l	20	48	Semi-annual	Grab Sample Average ²	48	NR	NA
Pyrene	gr/d	0.32	0.76	Semi-annual	Grab Sample Average ²	NA	NR	NA
Tetrachloroethylene	ug/l	52	164	Semi-annual	Grab Sample Average ²	164	NR	NA
Tetrachloroethylene	gr/d	0.83	2.61	Semi-annual	Grab Sample Average ²	NA	NR	NA
Toluene	ug/l	28	74	Semi-annual	Grab Sample Average ²	74	NR	NA
Toluene	gr/d	0.45	1.18	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,2,4 - Trichlorobenzene	ug/l	196	794	Semi-annual	Grab Sample Average ²	794	NR	NA
1,2,4 - Trichlorobenzene	gr/d	3.12	12.62	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,1,1-Trichloroethane	ug/l	22	59	Semi-annual	Grab Sample Average ²	59	NR	NA
1,1,1-Trichloroethane	gr/d	0.35	0.94	Semi-annual	Grab Sample Average ²	NA	NR	NA
1,1,2- Trichloroethane	ug/l	32	127	Twice per month	Grab Sample Average ²	127	NR	NA
1,1,2- Trichloroethane	gr/d	0.51	2.02	Twice per month	Grab Sample Average ²	NA	NR	NA
Trichloroethylene	ug/l	26	69	Semi-annual	Grab Sample Average ²	69	NR	NA
Trichloroethylene	gr/d	0.41	1.10	Semi-annual	Grab Sample Average ²	NA	NR	NA
Vinyl Chloride	ug/l	97	172	Semi-annual	Grab Sample Average ²	172	NR	NA
Vinyl Chloride	gr/d	1.54	2.73	Semi-annual	Grab Sample Average ²	NA	NR	NA
Cyanide, Total	mg/l	0.42	1.2	Semi-annual	Grab Sample Average ²	1.2	NR	NA
Cyanide, Total	gr/d	6.68	19.08	Semi-annual	Grab Sample Average ²	NA	NR	NA
Lead, Total	mg/l	0.1	0.5	Twice per month	Daily Composite	0.75	NR	NA
Lead, Total	gr/d	1.59	7.95	Twice per month	Daily Composite	NA	NR	NA
Zinc, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	NA
Zinc, Total	gr/d	15.9	31.8	Twice per month	Daily Composite	NA	NR	NA
BOD ⁵	mg/l	1,000	1,500	Twice per month	Daily Composite	2,250	NR	NA
COD	mg/l	NA	----	Monthly	Daily Composite	----	NR	NA
Oil and Grease, Hydrocarbon Fraction	mg/l	NA	100	Monthly	Grab Sample Average ²	150	NR	NA
pH (Day of Sampling)	S.U.	NA	NA	NR	Grab Sample Average ²	6.0 - 10.0	Twice per Month	RDS
pH, Minimum	S.U.	NA	NA	NA	Grab Sample Average ²	6.0	Continuous	Continuous
pH, Maximum	S.U.	NA	NA	NR	Grab Sample Average ²	10.0	Continuous	Continuous
Solids, Total Suspended	mg/l	NA	----	Monthly	Daily Composite	----	NR	NA

Table Footnotes:

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 "Grab Sample Average" for the purposes of this permit means an arithmetic average of all grab sample analyses. Grab samples shall be collected at least once every four hours over a full operating day for as long as a discharge exists on that day (minimum of two grab samples per day).

- (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 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

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: Danbury POTW

Permittee: R.S.A. CORP.

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0001473

<u>Mailing Address:</u>						<u>Location Address:</u>							
Street:	36 Old Sherman Turnpike					Street:	36 Old Sherman Turnpike						
City:	Danbury		ST:	CT	Zip: 06810		City:	Danbury		ST:	CT	Zip: 06810	
Contact Name:		Chad Henke				DMR Contact		Chad Henke					
Phone No.:		(203) 790-8100 ext. 136				Phone No.:		(203) 790-8100 ext. 136					
Contact E-mail:		C.Henke@rsachem.com				DMR Contact E-mail:		C.Henke@rsachem.com					

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

COMPLIANCE ISSUES

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

Private X Federal State Municipal (town only) Other public

Permit No. SP0001473

PERMIT FEES

<i>Discharge Code</i>	<i>DSN Number</i>	<i>Annual Fee</i>
501042Y	001-1	\$4,337.50

FOR SEWER DISCHARGES

Discharge to The City of Danbury POTW via its collection system. The facility ID. of the POTW is 034-001.

NATURE OF BUSINESS GENERATING DISCHARGE

R.S.A. CORP. produces food, pharmaceutical and polymer additives, specialty reagents, and other specialty organic chemicals.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: This discharge is made up of a maximum flow of 5,940 gallons per day of organic chemical manufacturing process wastewater resulting from vessel cleaning, product concentration, filtration and washing, scrubber pump effluent, vacuum pump seal wastewater, floor wash down, and stormwater from containment areas. Batch treatment consists of neutralization, oxidation, precipitation and filtration.

RESOURCES USED TO DRAFT PERMIT

- ☒ Federal Effluent Limitation Guideline 40 CFR Part 414, Subpart K
- ☐ Performance Standards
- ☒ Federal Development Document for the Organic Chemicals, Plastics and Synthetic Fibers Point Source Category
- ☐ Treatability Manual
- ☒ Department File Information
- ☐ Connecticut Water Quality Standards
- ☐ Anti-degradation Policy
- ☐ Coastal Management Consistency Review Form (See Other Comments)
- ☐ Other - Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- ☒ Pretreatment Standards for Existing Sources (PSES)
DSN 001-1: All parameters except total lead, zinc, BOD, COD, total suspended solids, oil petroleum (total recoverable), pH
- ☒ Case-by-Case Determination using Best Professional Judgement
DSN 001-1: Total lead, zinc, BOD, COD, total suspended solids, oil petroleum (total recoverable), pH

AML = Average Monthly Limit

MDL = Maximum Daily Limit

MIL = Maximum Instantaneous Limit

GENERAL COMMENTS

In developing the permit's concentration limits, EPA Organic Chemicals, Plastics, and Synthetic Fibers Categorical Limits (40 CFR Part 414 Subpart K) and Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies limits were compared. Except as noted above, the limits for the organic chemicals were based on the EPA categorical numbers and the limits for metals were based on Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies.

OTHER COMMENTS

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

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

Oil petroleum, total recoverable will be the permit parameter used in this permit, replacing oil and grease (hydrocarbon fraction) used in the previous permit.

All wastewaters that are discharged through DSN 001-1 are considered to be categorical (OCPSF) wastewaters.

The Department reviewed the company's reported average monthly flow for five years subsequent to this permit reissuance and calculated the long term average (LTA) flow to be 1,727 gallons per day. This calculated LTA is much lower than the average monthly flow limit of 4,200 gallons per day. Therefore, the Department used the average monthly flow limit of 4,200 gallons per day to calculate the average monthly and maximum daily mass limits for all parameters listed in Table A of this permit. This was done to ensure that the company will be able to comfortably meet the mass limits in the event that their average monthly discharge rate increases. The Department also included concentration based limits for all OCPSF parameters that are listed in Table A of this permit. In addition, the Department changed the sample type from a Grab to a Grab Sample Average to be more consistent with EPA guidelines.

The Department reviewed the company's compliance history. Besides having two BOD violations, one in June 2010 and one in June 2011, the company has been in full compliance of the permit since July 2011.

**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 **R.S.A. CORP.** ("the applicant") under section 22a-430 of the Connecticut General Statutes for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative determination that continuance of the existing system to treat the discharge would protect the waters of the state from pollution and the Commissioner proposes to 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

R.S.A. CORP. presently discharges a maximum of 5,940 gallons per day of organic chemical manufacturing wastewaters to the Danbury Water Pollution Control Facility from operations at an organic chemical manufacturing facility.

The name and mailing address of the permit applicant are: R.S.A. CORP., 36 Old Sherman Turnpike, Danbury, CT 06810.

The activity takes place at: 36 Old Sherman Turnpike, Danbury, CT 06810.

REGULATORY CONDITIONS

Type of Treatment

DSN 001-1: Treatment of wastewater occurs in batches and is job specific. It may consist of neutralization, oxidation, precipitation 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) and Section 22a-430-4(s) of the Regulations of Connecticut State Agencies and which will protect the waters of the state from pollution when all the conditions of this permit have been met.

In accordance with section 22a-430-4(l) of the Regulations of Connecticut State Agencies the permit contains effluent limitations for the following types of toxic substances: heavy metals, 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. 201106313

PERMIT ID NO.SP0001473

Interested persons may obtain copies of the application from Chad Henke, R.S.A. CORP., 36 Old Sherman Turnpike, Danbury, CT 06810, (203) 790-8100 ext. 136.

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/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.aao@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: 11/30/2012