

PRETREATMENT PERMIT

issued to

Permittee:

Bridgeport Fittings, Incorporated
705 Lordship Blvd
Stratford, CT 06615-7313

Location Address:

705 Lordship Blvd
Stratford, CT 06615-7313

Facility ID: 138-043

Permit ID: SP0000680

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) **Bridgeport Fittings, Incorporated**, ("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 to Comply
- (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.

"Annual" in the context of any sampling frequency, shall mean the sample must be collected in the month of January.

"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 the total volume of wastewater discharged from the 300-gallon chromium collection treatment tank following reduction of hexavalent to trivalent chromium.

"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 composite" means (1) a composite sample taken over a full operating day consisting of grab samples collected at equal intervals of no more than sixty (60) minutes and combined proportionally to flow, or (2) a composite sample continuously collected over a full operating day proportionally to flow. Upon submission of documentation by the applicant satisfactory to the commissioner that a discharge is of consistent effluent quality, the commissioner may allow equal sampling intervals of up to four (4) hours for a daily composite sample.

"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.

"mg/l" means milligrams per liter.

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

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

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of March, June, September, and December.

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

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

SECTION 3: COMMISSIONER'S DECISION

- (A) The Commissioner has made a final determination and found that the 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. 200802464 for permit reissuance received on October 14, 2008 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. SP0000680, issued by the Commissioner to the Permittee on April 14, 2004, the previous application submitted by the Permittee on December 6, 2000, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0000680, issued by the Commissioner to the Permittee on April 14, 2004.
 - (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT ISSUANCE] 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. SP0000680, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 200802464 received by the Department on October 14, 2008, 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. SP0000680, 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 tables below.

Table A						DRAFT		
Discharge Serial Number: 201-1				Monitoring Location:1				
Wastewater Description: Pretreated metal finishing wastewaters from zinc electroplating line, the Jessup cleaner line, giant burnishing line, the Regal burnishing line, vapor blast rinse unit, polishing filter backwash, and treatment floor trench								
Monitoring Location Description: At the sampler port from the re-circulation tank effluent								
Discharge is to: The City of Stratford 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	0.1	0.5	Semi-Annually	Daily Composite	0.75	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, Total	mg/l	0.65	1.2	Semi-Annually	Grab Sample Average	1.8	NR	Grab
Flow Rate, (Average Daily) ¹	gpd	30,800	NA	Daily	Total Flow	NA	NR	NA
Flow Total (Day of Sampling)	gpd	---	40,000	Weekly/Monthly	Total Flow	NA	NR	NA
Flow, Maximum During 24 hr Period ¹	gpd	NA	40,000	Daily	Total Flow	NA	NR	NA
Fluoride, Total	mg/l	20.0	30.0	Monthly	Daily Composite	45.0	NR	NA
Iron, total	mg/l	3.0	5.0	Semi-Annually	Daily Composite	7.5	NR	Grab
Lead, Total	mg/l	0.1	0.5	Semi-Annually	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	1.0	2.0	Semi-Annually	Daily Composite	3.0	NR	Grab
Nitrogen, Kjeldahl, total (as N)	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	Grab
Nitrogen, Nitrate Total (as N)	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	Grab
Nitrogen, Nitrite Total (as N)	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	Grab
Oil Petroleum, Total Recoverable	mg/l	NA	100.0	Semi-Annually	Grab Sample Average	150.0	NR	Grab
pH (Day of Sampling)	S.U.	NA	NA	NR	NA	6.0 – 10.5	Weekly/Monthly	RDS
pH, Maximum	S.U.	NA	NA	NR	NA	10.5	Continuous	Continuous
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous
Silver, Total	mg/l	0.1	0.43	Semi-Annually	Daily Composite	0.64	NR	Grab
Total Suspended Solids	mg/l	NA	60.0	Weekly	Daily Composite	90.0	NR	Grab
Total Toxic Organics ³	mg/l	NA	2.13	NR	NA	2.13	Semi-Annual	Grab
Zinc, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
Table A Footnotes :								
Footnotes:								
¹ For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Average Daily Flow and 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 See Section 5 (G) of this permit.								

Table B

Table B								
Discharge Serial Number: 201-A						Monitoring Location:1		
Wastewater Description: Hexavalent chromium bearing wastewaters from the zinc plating line								
Monitoring Location Description: At the sampling port of the 300 gallon hexavalent chromium reduction holding tank								
Discharge is to: First stage neutralization sump (DSN 201 treatment system)								
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
Chromium, Hexavalent	mg/l	0.1	0.2	Monthly	Grab Sample Average ²	0.3	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 For the purposes of this table, “Grab Sample Average” is defined as follows: A minimum of two grab samples for each batch shall be collected and analyzed separately and the results averaged. Such grab samples shall be collected at the beginning and ending of the discharge.

- (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 ("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 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

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

Macky McCleary
Deputy Commissioner

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Bridgeport Fittings, Incorporated

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0000680

APPLICATION #: 200802464

FACILITY ID. 138-043

<u>Mailing Address:</u>						<u>Location Address:</u>					
Street:	705 Lordship Blvd.					Street:	705 Lordship Blvd.				
City:	Stratford	ST:	CT	Zip:	06615-7313	City:	Stratford	ST:	CT	Zip:	06615-7313
Contact Name:	Frank Timmeny					DMR Contact:	Same				
Phone No.:	(203) 381-3461					Phone No.:					
Contact E-mail:	frank@bptfittings.com					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

POLLUTION PREVENTION MANDATE ENVIRONMENTAL EQUITY ISSUE

SIC CODE: 3644 Noncurrent-Carrying Wiring Devices

SOLVENT MANAGEMENT PLAN

Is Solvent Management Plan (SMP) Approved? Yes X No If yes, indicate approval date: November 9, 1990

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 CODE

Private X Federal State Municipal (town only) Other public

DEEP STAFF ENGINEER Enna Wilson

PERMIT FEES

Discharge Code	DSN Number	Annual Fee
501035Z	201-1	\$ 8,425.00

FOR SEWER DISCHARGES

Discharge to the City of Stratford Water Pollution Control Facility via its collection system. The facility ID. of the POTW is 138-001.

NATURE OF BUSINESS GENERATING DISCHARGE

Bridgeport Fittings, Incorporated is primarily engaged in the manufacturing of noncurrent-carrying wiring devices. Important products of this facility include conduits and fittings; manufacturing of rigid conduit bodies, rigid conduit and IMC fittings, EMT conduit fittings, liquid tight conduit fittings, portable cord fitting, flexible metal conduit and armored cable fittings.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 201 -1: Consists of a maximum daily flow of 40,000 gallons per day of pretreated metal finishing wastewaters from the zinc electroplating line, the Jessup cleaner line, giant burnishing line, the Regal burnishing line, vapor blast rinse unit, polishing filter backwash, and treatment floor trench. Wastewaters receive neutralization, flocculation, clarification, polishing filtration, and sludge dewatering prior to being discharged to the sanitary sewer.

DSN 201 -A: Hexavalent chromium reduction to trivalent chromium. All zinc electroplating line rinse waters are pre-treated in order to reduce the chromium from the hexavalent to the trivalent form. These wastewaters are treated in the hexavalent chromium reduction tank where the pH of the wastewater is adjusted and sodium metabisulfate is added to reduce the chromium and then pumped into the first stage neutralization sump (3,800 gallons). Following treatment, the wastewater is sampled (DSN 201-A).

EFFLUENT VIOLATIONS

Based on DMR data from January 2009- February 2012, the following violations were observed for DSN201.

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
July 2009	201	Chromium, Total	Maximum, Daily	2.0 mg/L	5.3 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☐ Unknown ☐ None provided ☒ Other					
<u>REASON:</u> Apparently, backwashing and flushing of the wastewater treatment filters may have caused this one time high level. No corrective actions were necessary to prevent recurrence.					

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
June 2010	201	Fluoride	Maximum, Daily	30.0 mg/L	33 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☐ Unknown ☐ None provided ☒ Other					

REASON: Chemicals containing fluoride are used in the zinc electroplating line. Bridgeport Fittings has requested to modify its zinc plating line by replacing the current plating solution with a new chemical that does not contain fluoride. On June 7, 2012, DEEP issued an approval for this facility modification.

MONTH/YEAR	DSN	PARAMETER	TYPE OF LIMIT	PERMITTED LIMIT	EXCEEDENCE
June 2011	201	Fluoride	Maximum, Daily	30.0 mg/L	31 mg/L
REASON: ☐ Equipment Related ☐ Operator Error ☐ Unknown ☐ None provided ☒ Other					
REASON: Chemicals containing fluoride are used in the zinc electroplating line. Bridgeport Fittings has requested to modify its zinc plating line by replacing the current plating solution with a new chemical that does not contain fluoride. On June 7, 2012, DEEP issued an approval for this facility modification.					

RESOURCES USED TO DRAFT PERMIT

- X Federal Effluent Limitation Guideline 40 CFR 433.15 (PSES)
Metal Finishing
- Performance Standards
- X Federal Development Document Metal Finishing Point Source
Name of Category
- Treatability Manual
- X Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy
- X Coastal Management Consistency Review Form (See Other Comments)
- Other – Explain

BASIS FOR LIMITATIONS, STANDARDS, OR CONDITIONS

- X Pretreatment Standards for Existing Sources (PSES)
DSN 201 -1: 40 CFR 433 Metal Finishing: silver (MDL) and TTO
- X Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (AML, MDL, MIL)
DSN 201 -1: Total cadmium, copper, nickel, fluoride, iron, chromium, lead, cyanide (AML, MDL), zinc, and silver (AML).
DSN 201 -A: Hexavalent chromium
- X Case-by-Case Determination and Best Professional Judgment (AML, MDL, MIL)
DSN 201-1: pH, total kjeldahl nitrogen, nitrate, nitrite, total suspended solids, recoverable oil petroleum, cyanide (MIL), and silver (MIL)

AML- Average Monthly limit, MDL-Maximum Daily Limit, MIL-Maximum Instantaneous Limit

GENERAL COMMENTS

Bridgeport Fittings, Incorporated generates wastewater from the following primary metal finishing operations:
PERMIT No. SP0000680

electroplating and barrel finishing and cleaning. Bridgeport Fittings initiated this discharge prior to August 31, 1982, the promulgation date of the Pretreatment Standards for New Sources (PSNS). Therefore, the facility is an existing source, subject to the PSES in 40 CFR 433, Subpart A.

In developing the permit's concentration limits, EPA Metal Finishing Categorical Limits (40 CFR Part 433) and Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies limits were compared. Except for total silver (MDL), the Connecticut limits were found to be more stringent and thus incorporated in the permit. The silver (MDL) permit limit is based on the 40 CFR 433.

DEEP staff is recommending pH limits of (6.0 - 10.5) S.U., which are considered to be protective of sanitary sewer systems.

The differences between the effluent limitations and monitoring requirements of the existing permit and this permit renewal are as follows:

Proposed Internal Hexavalent Chromium Effluent Limitations

The technical review of the Bridgeport Fittings, Incorporated's renewal application and supporting analytical results provided by the Applicant revealed that hexavalent chromium has been present in the acid zinc electroplating wastewater at 0.15 mg/l. The Permittee provided documentation showing that when processing stainless steel through the zinc electroplating line, hexavalent chromium is released into the wastewaters. During this review, DEEP staff requested the Applicant provide hexavalent chromium reduction treatment. As a result, on May 31, 2012, Bridgeport Fittings requested authorization to modify its wastewater treatment system for DSN 201 to include hexavalent chromium reduction treatment. On June 7, 2012, DEEP issued an approval for this treatment system modification. Internal monitoring for hexavalent chromium are required to assess the effectiveness of the system providing treatment before combining with other waste streams. Therefore, the DEEP staff is requiring that internal effluent limitations and monitoring for hexavalent chromium be included in Table B of this permit renewal.

Proposed Average Monthly Limit for Fluoride

The existing permit issued on April 14, 2004 contains only a maximum daily limit and an instantaneous limit for total fluoride of 30.0 mg/l and 45.0 mg/l, respectively. A review of Bridgeport Fittings, Incorporated's DMRs over the last five (5) years revealed that the Applicant has exceeded the maximum daily limit four (4) times and the average monthly effluent results have been above 20.0 mg/l five (5) times, which is the average monthly limit for fluoride contained in section 22a-430-4(s) of the Regulations of Connecticut State Agencies. As a result, DEEP staff required the Applicant to reduce fluoride effluent levels. On May 31, 2012, Bridgeport Fittings requested authorization to replace the current fluoride containing product used in the plating line with a fluoride free product. On June 7, 2012, DEEP issued an approval for this facility modification. DEEP staff is requiring that an average monthly limit for **total fluoride** be included in Table A of this permit renewal based on section 22a-430-4(s) of the Regulations of Connecticut State Agencies.

A review of the Bridgeport Fittings, Incorporated's renewal application and supporting analytical results revealed that the total nitrogen loading is 17 lb/day, which is close to the 20 lb/day threshold the agency uses as a guideline to require periodic total nitrogen monitoring (See attached DEEP memorandum dated August 2, 2000). DEEP staff is recommending quarterly monitoring requirements for total kjeldahl nitrogen, nitrate, and nitrite in this permit renewal.

A review of the Bridgeport Fittings, Incorporated's DMRs over the last five (5) years revealed that results for total iron have been consistently at low levels between 0.005 – 0.2 mg/l. Therefore, the DEEP staff is recommending the frequency of monitoring for total iron be reduced from monthly to semi-annually in this permit renewal.

Based on a review of the Bridgeport Fittings, Incorporated's DMRs over the last five (5) years, effluent results for Total Recoverable Oil Petroleum have been consistently below detection levels. Therefore, the DEEP staff is recommending the frequency of monitoring for this parameter be reduced from weekly to semi-annually in this permit renewal.

OTHER COMMENTS

DRAFT

The facility is located in the coastal boundary, but this permit is a renewal and the discharge is to a sanitary sewer. Since this application does not include any new exterior construction at the facility, the applicant was not required to submit a Coastal Consistency Review form. This facility is considered to be consistent with the Connecticut Coastal Management Act.

The Permittee is also subject to the terms and conditions of the following general permits:

General Permits for the Discharge of Stormwater Associated with Industrial Activity (GSI001131).

General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater (no registration required).

General Permit for the Discharge of Minor Boiler Blowdown (no registration required).

Memorandum

To: Bureau of Water Management
PERD and P&S Staff

From: Bob Smith *BUS*

Date: August 2, 2000

Re: NITROGEN LIMITS IN DISCHARGE PERMITS

As most of you are aware, CTDEP and NY State Department of Environmental Conservation are in the midst of developing a Total Maximum Daily Load (TMDL) to control nitrogen loadings to Long Island Sound. The draft TMDL was released for public comment in the fall and a response to those comments is planned for fall 2000. A final TMDL will be submitted to EPA in late 2000.

To ensure a smooth transition into nitrogen permitting over the next year or two, I am asking that all permits that come up for renewal be reviewed for nitrogen contribution. If they have never had a nitrogen permit limit or been required to monitor nitrogen (ammonia, TKN, nitrite/nitrate), that does not necessarily mean that their nitrogen load is inconsequential. If there is reason to expect a nitrogen load above a 20-lb/day threshold may exist, the first step should be to require effluent monitoring for the complete nitrogen series. Permittees with discharges above the 20-pound threshold should be advised of anticipated nitrogen control needs and, as a permit condition, begin planning to show how they can accomplish a 63% reduction from their current load.

The 20 lb/day threshold should be for nitrogen added by a facility only. If the difference between the influent and the effluent is less than 20 lb/day, as may be the case for cooling water discharges for example, the facility is under the threshold. Similarly, intermittent discharges should be considered only if the net, daily average for the year exceeds 20 lb/day.

I thank all of you for helping to implement nitrogen controls in the coming years.

**Notice Of Tentative Determination
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 **Bridgeport Fittings, Incorporated** ("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

Bridgeport Fittings, Incorporated presently discharges a maximum daily flow of 40,000 gallons per day of pretreated metal finishing wastewaters from the zinc electroplating line, the Jessup cleaner line, giant burnishing line, the Regal burnishing line, vapor blast rinse unit, polishing filter backwash, and treatment floor trench to the City of Stratford Water Pollution Control Facility from its manufacturing of noncurrent-carrying wiring devices at a metal finishing facility.

The name and mailing address of the permit applicant are: **Bridgeport Fittings, Incorporated**, 705 Lordship Blvd, Stratford, CT 06615-7313.

The activity takes place at: 705 Lordship Blvd, Stratford, CT 06615-7313.

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 201-1: Neutralization, flocculation, clarification, and sludge dewatering
DSN 201-A: Hexavalent chromium reduction to trivalent chromium

Effluent Limitations

This permit contains effluent limitations consistent with a Case-by-Case Determination using the criteria of Best Professional Judgment, 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, cyanides, and volatile, acid, and base/neutral organic compounds.

This permit contains effluent limitations on internal waste streams.

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. 200802464

PERMIT ID NO. SP0000680

Interested persons may obtain copies of the application from Frank Timmeny, Bridgeport Fittings, Incorporated, 705 Lordship Blvd, Stratford, CT 06615-7313, (203) 381-3461.

The application is available for inspection by contacting Enna Wilson at 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 Enna Wilson, 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 Connecticut Department of Energy and Environmental Protection is an Affirmative Action and Equal Opportunity Employer that is committed to requirements of the Americans With Disabilities Act. To request an accommodation call 860-424-3194, or deep.hrmed@ct.gov.

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

Dated: 6/28/2012