

PRETREATMENT PERMIT

issued to

Vanderbilt Chemicals, LLC
31 Taylor Avenue
Bethel, CT 06801

Location Address:

31 Taylor Avenue
Bethel, CT 06801

Issuance Date: [TBD – Upon Signature]
Effective Date: [1st of the Month following
Issuance Date]

Permit ID: SP0000110

Expiration Date: [Five (5) Years from Effective
Date]

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 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 Title 40 of the Code of Federal Regulations Part 403 ("40 CFR Part 403").
- (B) Vanderbilt Chemicals, 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 subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

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

Section 22a-430-4 Procedures and Criteria

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

- (f) Draft Permits, Fact Sheets
- (g) Public Notice, Notice of Hearing
- (h) Public Comments
- (i) Final Determination
- (j) Public Hearings
- (k) Submission of Plans and Specifications. Approval.
- (l) Establishing Effluent Limitations and Conditions
- (m) Case by Case Determinations
- (n) Permit issuance or renewal
- (o) Permit Transfer
- (p) Permit revocation, denial or modification
- (q) Variances
- (r) Secondary Treatment Requirements
- (s) Treatment Requirements for Metals and Cyanide
- (t) Discharges to POTWs - Prohibitions

- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars (\$25,000) 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 thirty (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 RCSA.

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 sections 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 Discharge Monitoring Report ("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 Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"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.

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

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S FINAL DETERMINATION

- (A) The Commissioner has made a final determination and found that the continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's final determination is based on Application No. 201908502 for permit reissuance received on July 18, 2019 and the administrative record established in the processing of that application.
- (B) From the effective date of this permit, for a term not to exceed five years and 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. SP0000110, issued by the Commissioner to the Permittee on the issuance date, Application No. 201908502 received by the Department of Energy and Environmental Protection ("Department") on July 18, 2019 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. SP0000110 following the issuance date of this permit.
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the CGS 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 CGS 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 the 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 process wastewaters (accelerator process wastewater, VANLUBE 7723 process wastewater, reactor cleaning wastewater, pilot plant wastewater, laboratory wastewater, maintenance wastewater and sink drains) and non-process wastewaters (steam condensate, cooling tower blowdown, water softener backwash, reactor jacket blowdown, air compressor condensate, boiler blowdown, and stormwater from secondary containment of chemical storage areas)								
Monitoring Location Description: Collection sump following the final air stripper								
Discharge is to: City of Danbury Water Pollution Control Plant via the Town of Bethel Sanitary Sewer System								
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
Acenaphthene	ug/l	7.41	18.33	Semi-Annually	Daily Composite	27.49	NR	Grab
Anthracene	ug/l	7.41	18.33	Semi-Annually	Daily Composite	27.49	NR	Grab
Antimony, Total	ug/l	NA	-----	Semi-Annually	Daily Composite	NA	NR	Grab
Benzene	ug/l	22.23	52.26	Semi-Annually	Grab Sample Average	78.39	NR	Grab
Biochemical Oxygen Demand, 5 day	mg/l	1,000	1,500	Semi-Annually	Daily Composite	2,250	NR	Grab
Bis (2-ethyhexyl) Phthalate	ug/l	37.05	100.62	Semi-Annually	Daily Composite	150.93	NR	Grab
Cadmium, Total	mg/l	0.1	0.1	Twice per Month	Daily Composite	0.1	NR	Grab
Carbon Tetrachloride	ug/l	55.38	148.2	Semi-Annually	Grab Sample Average	222.3	NR	Grab
Chemical Oxygen Demand	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	Grab
Chlorobenzene	ug/l	55.38	148.2	Semi-Annually	Grab Sample Average	222.3	NR	Grab
Chloroethane	ug/l	42.9	115.05	Semi-Annually	Grab Sample Average	172.57	NR	Grab
Chloroform	ug/l	43.29	126.75	Semi-Annually	Grab Sample Average	190.12	NR	Grab
Chromium, Hexavalent	mg/l	NA	0.1	Semi-Annually	Grab Sample Average	0.1	NR	Grab
Chromium, Total	mg/l	NA	1.0	Semi-Annually	Daily Composite	1.0	NR	Grab
Copper, Total	mg/l	0.5	1.0	Twice per Month	Daily Composite	1.0	NR	Grab
Cyanide, Total	ug/l	163.8	468	Semi-Annually	Grab Sample Average	702	NR	Grab
Di-n-butyl Phthalate	ug/l	7.8	16.77	Semi-Annually	Daily Composite	25.15	NR	Grab
1,2 - Dichlorobenzene	ug/l	76.44	309.66	Semi-Annually	Daily Composite	464.49	NR	Grab
1,3 - Dichlorobenzene	ug/l	55.38	148.2	Semi-Annually	Daily Composite	222.3	NR	Grab
1,4 - Dichlorobenzene	ug/l	55.38	148.2	Semi-Annually	Daily Composite	222.3	NR	Grab
1,1 - Dichloroethane	ug/l	8.58	23.01	Semi-Annually	Grab Sample Average	34.51	NR	Grab
1,2 - Dichloroethane	ug/l	70.2	223.86	Semi-Annually	Grab Sample Average	335.79	NR	Grab
1,1 - Dichloroethylene	ug/l	8.58	23.4	Semi-Annually	Grab Sample Average	35.1	NR	Grab
1,2 - trans-Dichloroethylene	ug/l	9.75	25.74	Semi-Annually	Grab Sample Average	38.61	NR	Grab
1,2 - Dichloropropane	ug/l	76.44	309.66	Semi-Annually	Grab Sample Average	464.49	NR	Grab
1,3 - Dichloropropylene	ug/l	76.44	309.66	Semi-Annually	Grab Sample Average	464.49	NR	Grab
Diethyl Amine	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	Grab

Diethyl Phthalate	ug/l	17.94	44.07	Semi-Annually	Daily Composite	66.10	NR	Grab
Dimethyl Phthalate	ug/l	7.41	18.33	Semi-Annually	Daily Composite	27.49	NR	Grab
4,6 - Dinitro-o-cresol	ug/l	30.42	108.03	Semi-Annually	Daily Composite	162.04	NR	Grab
Ethylbenzene	ug/l	55.38	148.2	Semi-Annually	Grab Sample Average	222.3	NR	Grab
Flow, Average Daily ¹	gpd	40,000	NA	Continuous	Daily Flow	NA	NR	NA
Flow, Maximum Daily ¹	gpd	NA	50,000	Continuous	Daily Flow	NA	NR	NA
Flow, Day of Sampling	gpd	-----	50,000	Twice per Month	Daily Flow	NA	NR	NA
Fluoranthene	ug/l	8.58	21.06	Semi-Annually	Daily Composite	31.59	NR	Grab
Fluorene	ug/l	7.41	18.33	Semi-Annually	Daily Composite	27.49	NR	Grab
Hexachlorobenzene	ug/l	76.44	309.66	Semi-Annually	Daily Composite	464.49	NR	Grab
Hexachlorobutadiene	ug/l	55.38	148.2	Semi-Annually	Daily Composite	222.3	NR	Grab
Hexachloroethane	ug/l	76.44	309.66	Semi-Annually	Daily Composite	464.49	NR	Grab
Iron, Total	ug/l	NA	-----	Semi-Annually	Daily Composite	NA	NR	Grab
Lead, Total	ug/l	124.8	269.1	Twice per Month	Daily Composite	403.6	NR	Grab
Methyl Chloride	ug/l	42.9	115.05	Semi-Annually	Grab Sample Average	172.57	NR	Grab
Methylene Chloride	ug/l	14.04	66.3	Twice per Month	Grab Sample Average	99.45	NR	Grab
Naphthalene	ug/l	7.41	18.33	Semi-Annually	Daily Composite	27.49	NR	Grab
Nickel, Total	mg/l	NA	1.0	Semi-Annually	Daily Composite	1.0	NR	Grab
Nitrobenzene	ug/l	872.43	2,496.78	Semi-Annually	Daily Composite	3,745.17	NR	Grab
2 - Nitrophenol	ug/l	25.35	90.09	Semi-Annually	Daily Composite	135.13	NR	Grab
4 - Nitrophenol	ug/l	63.18	224.64	Twice per Month	Daily Composite	336.96	NR	Grab
Oil Petroleum, Total Recoverable	mg/l	NA	100	Semi-Annually	Grab Sample Average	150	NR	Grab
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 – 10.0	Twice per Month	RDS
Phenanthrene	ug/l	7.41	18.33	Semi-Annually	Daily Composite	27.49	NR	Grab
Phosphorus, Total (as P)	ug/l	-----	-----	Monthly	Daily Composite	NA	NR	Grab
Pyrene	ug/l	7.8	18.72	Semi-Annually	Daily Composite	28.08	NR	Grab
Solids, Total Suspended	mg/l	700	1,000	Semi-Annually	Daily Composite	1,500	NR	Grab
Sulfate	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	Grab
Tetrachloroethylene	ug/l	20.28	63.96	Semi-Annually	Grab Sample Average	95.94	NR	Grab
Toluene	ug/l	10.92	28.86	Semi-Annually	Grab Sample Average	43.29	NR	Grab
1,2,4 - Trichlorobenzene	ug/l	76.44	309.66	Semi-Annually	Daily Composite	464.49	NR	Grab
1,1,1 - Trichloroethane	ug/l	8.58	23.01	Semi-Annually	Grab Sample Average	34.51	NR	Grab
1,1,2 - Trichloroethane	ug/l	12.48	49.53	Semi-Annually	Grab Sample Average	74.29	NR	Grab
Trichloroethylene	ug/l	10.14	26.91	Semi-Annually	Grab Sample Average	40.36	NR	Grab
Vinyl Chloride	ug/l	37.83	67.08	Semi-Annually	Grab Sample Average	100.62	NR	Grab
Zinc, Total	ug/l	409.5	1,017.9	Semi-Annually	Daily Composite	1,526.8	NR	Grab

Table Footnotes and Remarks:

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 sampling 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'.

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- (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 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 DMR and reported to the Bureau of Materials Management and Compliance Assurance using NetDMR. 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 by the Bureau of Materials Management and Compliance Assurance by the last day of the month following the month in which samples are taken.
- (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) DMR Reporting Requirements
 - 1. 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 DMRs and other required reports through a secure internet connection.

a. Submittal of Reports Using NetDMR

Unless otherwise approved by the Commissioner, 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 no later than the thirtieth (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 and associated attachments 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>.

b. 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 the 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

c. Submittal of Hard Copy DMRs

If an opt-out request has been submitted to the Department and approved by the Commissioner, the results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance at the address below. 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 the address below by the last day of the month following the month in which samples are taken.

Water Permitting and Enforcement Division (Attn: DMR Processing)
Bureau of Materials Management and Compliance Assurance
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, Water Permitting and Enforcement Division within thirty (30) days of the date of the analytical laboratory report identifying the exceedance.
- (B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division 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 1(B) 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, Water Permitting and Enforcement Division within twenty-four (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 (12) 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 forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (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

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Yvonne Bolton

Bureau Chief

Bureau of Materials Management and Compliance Assurance

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cc: City of Danbury WPCP