

Frequently Asked Questions

General Permit for Discharges from Miscellaneous Industrial Users (MIU GP)

General Permit for the Discharge of Wastewaters from Significant Industrial Users (SIU GP)

Part I-- Questions Common to Both General Permits

1) **Question:** My non-domestic, pretreatment wastewaters that discharge to sanitary sewer or are transported to a Publicly Owned Treatment Works (“POTW” or sewage treatment plant) were authorized under the *General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater* (“MISC GP”) that expired October 30, 2020. Should I assume these discharges will be automatically authorized under the new MIU GP?

Answer: No. See Section 3 of the MIU GP for eligible activities and requirements for authorization. You are deemed authorized provided you are complying with all terms and conditions of the MIU GP and any additional requirements of each applicable POTW Authority. If your facility is a Significant Industrial User (“SIU”), the discharges are ineligible for authorization under the MIU GP.

SIUs must seek authorization for their pretreatment discharges by applying for an individual permit and/or registering eligible discharges under the *General Permit for the Discharge of Wastewaters from Significant Industrial Users* (“SIU GP”).

2) **Question:** How can I determine if my facility is a Significant Industrial User (SIU)?

Answer: The definition of Significant Industrial User can be found on page 44 of 72 in the MIU GP and is summarized below.

A facility can be a Significant Industrial User if their non-domestic discharge:

- A) is subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N (see question #3 for further discussion), or
- B) has a cumulative maximum flow of 25,000 gallons per day or more of **process** wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blowdown wastewater), or

- C) contributes a process waste stream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant; or
- D) is designated as such by the Commissioner on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

3) Question: Where can I find a list of the Categorical Standards?

Answer: You can read about each at 40 CFR chapter I, subchapter N using the links below:

[40 CFR Chapter I, Subchapter N, Parts 400 through 424](#)

[40 CFR Chapter I, Subchapter N, Parts 425 through 471](#)

[Summary of Industrial Sectors \(includes SIC & NAICS Codes\) with Categorical Pretreatment Standards and Requirements](#)

4) Question: Should the Pharmaceutical Manufacturing category (40 CFR Part 439) be considered an industrial category with categorical pretreatment standards?¹

Answer: Yes. Any promulgated industrial category with at least one subpart containing either PSES or PSNS requirements would be considered an industrial category with categorical pretreatment standards. In short, subparts A-E of the Pharmaceutical Manufacturing category are considered to have PSES or PSNS requirements. Therefore, an industrial user subject to one of these subparts would be considered a Categorical Industrial User (CIU), and thus automatically a SIU.

While there are many industrial categories with promulgated effluent guidelines and standards, not all contain PSES or PSNS requirements. Where an IU falls within a promulgated industrial category that only provides reference to 40 CFR Part 403 or Part 128 (e.g., the prohibited discharge standards), this alone would not be considered PSES or PSNS requirements, and therefore, it would not be considered an IU subject to categorical pretreatment standards.

5) Question: If a categorical pretreatment standard requires testing or a certification statement (i.e., certification that a particular pollutant or process is not used, as in the case of paper and pharmaceutical standards) and a categorical industry certifies that it does not use the pollutant of concern, is it still a CIU?¹

¹This question and answer were adapted from a 1993 letter from Jeffrey Lape, Acting Chief, EPA Pretreatment and Multimedia Branch to Robert F. Babcock, Michigan Department of Natural Resources.

Answer: Yes. If the IU meets the applicability requirements of the categorical standard, and is subject to specific PSES and PSNS requirements, then it would be considered a CIU and thus a SIU.

6) Question: Is the certification a one-time statement, or is it required as part of the categorical industry's continued compliance report?¹

Answer: Should the categorical pretreatment standard require a testing or certification statement, the CIU must report and certify that they are not using the pollutant of concern, and this must be done semiannually as required by 40 CFR Part 403.121, unless specified otherwise by the Categorical pretreatment standard.

7) Question: If an IU is subject to a categorical pretreatment standard which provides a requirement of "no discharge of pollutants", or similar requirement, is the IU considered a CIU?¹

Answer: Yes. There are a number of categorical pretreatment standards which have PSES or PSNS requirements that contain such language. An IU subject to this particular PSES or PSNS requirement is considered a CIU, and thus a SIU.

8) Question: My facility has an NPDES permit for discharges subject to a federal categorical standard. My facility is also an Industrial User with other discharges to the POTW. Which GP am I eligible to file under: SIU or MIU GP?

Answer: Such facility may seek authorization under the SIU GP or an individual permit for their other non-categorical discharges to the POTW.

9) My facility has an NPDES permit for discharges NOT subject to a federal categorical standard. My facility is also an Industrial User with non-domestic discharges to the POTW. Which GP am I eligible to file under: SIU or MIU GP?

Answer: Refer to question 2 for the definition of Significant Industrial User (SIU). If the facility is an SIU, all non-domestic wastewater discharges must be authorized by either the SIU GP or an individual permit. If the facility is not an SIU, the non-domestic discharges may be authorized under the MIU GP (provided the Requirements for Authorization at section 3(b) of the MIU GP are met) or an individual permit.

10) Question: Our facility has been determined to be an SIU. Our discharges were previously authorized under the MISC GP, but were below the flow threshold requiring registration. Will we have to register these discharges under the SIU GP?

¹This question and answer were adapted from a 1993 letter from Jeffrey Lape, Acting Chief, EPA Pretreatment and Multimedia Branch to Robert F. Babcock, Michigan Department of Natural Resources.

Answer: Yes. The SIU GP has no thresholds below which an SIU facility does not have to register their pretreatment wastewaters.

11) Question: What are the categories of process wastewater in the MIU GP and the SIU GP?

Answer: Appendix A of the SIU GP defines 'process wastewaters' as the following:

"Process wastewater" means any wastewater which, during manufacturing, commercial, mining or silvicultural activities, comes into direct contact with, or results from the production, use or handling of any process, raw material or intermediate or final product, byproduct or waste product. This includes but is not limited to contact cooling and heating wastewater, cutting and grinding wastewater, non-destruct testing rinsewater, printing and photographic processing wastewater, tumbling or cleaning of parts wastewater, water treatment wastewater, commercial laundry wastewater, food processing wastewater, reverse osmosis reject water, building maintenance wastewater and other process wastewater. Process wastewater does not include air compressor condensate, noncontact cooling water, domestic sewage, blowdown from heating and cooling equipment, hydrostatic pressure testing wastewaters, stormwater, or wastewater from agricultural activities. Any wastewaters which comingle with process wastewaters prior to the monitoring location shall be deemed to be process wastewater.

The following are deemed process wastewaters. See Section 4(a)(1) on page 10 of 72 in the MIU GP or Section 5B(b) on page 38 of 91 in the SIU GP.

Group I: Process Wastewater Discharges

- Commercial laundry wastewater
- Contact cooling and heating wastewater
- Cutting and grinding wastewater
- Food processing wastewater (including breweries and distilleries)
- Non-destruct testing rinsewater
- Printing and photographic processing wastewater
- Reverse osmosis reject water
- Tumbling or cleaning of parts wastewater
- Water treatment wastewater
- **Other process wastewaters**, including other wastewaters determined by the Commissioner to be process wastewaters.

12) Question: What are the categories of non-process wastewater in the MIU GP and the SIU GP?

Answer: The categories of non-process wastewater are listed in Section 4(a)(1) on page 10 of 72 in the MIU GP or Section 5B(b) on page 38 of 91 in the SIU GP:

Group II: Non-process Wastewater Discharges

- Air compressor condensate & blowdown
- Boiler blowdown wastewater
- Building maintenance wastewater
- Fire suppression system testing wastewater
- Hydrostatic pressure testing wastewater
- Non-contact cooling water
- Potable water system maintenance or sampling wastewaters
- Swimming pool wastewater
- Vehicle maintenance wastewater
- **Other non-process wastewaters**, including other wastewaters determined by the Commissioner to be non-process wastewaters.

Note: any non-process wastewaters that comingle with process wastewater shall be deemed process wastewater.

13) Question: My discharges meet the definition of Miscellaneous Industrial User wastewater. Am I eligible to use the MIU GP? (page 40 of 72 in the MIU GP)

Answer: *“Miscellaneous Industrial User wastewater” or “MIU wastewater”* (formerly known as *“Miscellaneous sewer compatible wastewater” or “MISC wastewater”*), means any wastewater discharge that is NOT subject to Federal Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N as amended. Domestic sewage including septage or sewage from portable sources and groundwater remediation wastewater are excluded from this definition. MIU wastewater includes but is not limited to air compressor condensate & blowdown, boiler blowdown, building maintenance wastewater, commercial laundry wastewater, contact cooling & heating water, cutting & grinding wastewater, fire suppression system testwater, food processing wastewater, hydrostatic pressure testing wastewater, non-contact cooling water, non-destruct testing rinsewater, printing and photographic processing wastewater, tumbling or cleaning of parts wastewater, water treatment wastewater, and vehicle maintenance wastewater.

Before concluding that you can use the MIU GP, you must determine if you have process wastewater in your MIU wastewater (see question 11 above). If your maximum daily flow of process wastewater <25,000 gpd, and your site is not considered a Significant Industrial User (see question 2 above), you may use the MIU GP to authorize your MIU wastewater discharges provided the Requirements for Authorization at section 3(b) of the MIU GP are met. If your maximum daily flow of process wastewater \geq 25,000 gpd or your facility is considered an SIU for some other reason, you must use either the SIU GP or an individual permit to authorize your wastewater discharge.

14) Question: I know that my facility is not subject to Categorical Standards at 40 CFR 403.6 and 40 CFR chapter I, subchapter N. Are my non-domestic discharges always authorized by the MIU GP?

Answer: No. You must refer back to question 2) and look at the Significant Industrial User definition in its entirety. If your facility is not an SIU, you must either complete the MIU GP Notification Form and submit it to each applicable POTW Authority or apply for an individual permit from the CT DEEP.

15) Question: My non-domestic wastewater is transported by vehicle to the receiving POTW. Does that affect whether I can use the MIU GP or the SIU GP to authorize the discharge of my wastewater?

Answer: Industrial users who transport their industrial wastewater discharges to the receiving POTW must still determine if their facility is a Significant Industrial User to determine which permit they may use. See questions 1, 2, & 3 of this document for help in determining if your facility is a Significant Industrial User. If yes, the non-domestic wastewater you transport must be registered under the SIU GP. If not, you may complete the MIU GP Notification Form and submit it to the POTW that is accepting your transported wastewater.

16) Question: The federal definition of SIU uses an average daily flow threshold of 25,000 gpd, but the MIU and SIU GPs use a maximum daily flow threshold of 25,000 gpd. Why the difference?

Answer: As the Control Authority, the CT DEEP has chosen to broaden the universe of industrial users (IUs) that will meet the definition of Significant Industrial User and therefore will be subject to additional CT DEEP oversight.

17) Question: The *General Permit for the Discharge of Vehicle Maintenance Wastewater* (Vehicle Maintenance GP) will be expiring January 23, 2021. How should permittees continue their authorization to discharge vehicle maintenance wastewater?

Answer: The Vehicle Maintenance GP will not be reissued after it expires January 23, 2021. Vehicle maintenance wastewater will be eligible for coverage under either the MIU GP or the SIU GP as a Group II Non-process wastewater. For those existing registrants of the Vehicle Maintenance GP seeking coverage under the MIU GP, an MIU GP Notification Form must be submitted to each applicable POTW Authority by April 29, 2021. A new discharger of vehicle maintenance wastewater must submit the MIU GP Notification Form before the discharge can begin.

For SIUs generating vehicle maintenance wastewater seeking coverage under the SIU GP, Registration Forms must be submitted to CT DEEP by April 29, 2021.

18) Question: What is the sampling frequency for process wastewater discharges less than 1,000 gpd in the MIU GP and SIU GPs?

Answer: While there is no specified sampling frequency for process wastewater discharges less than 1,000 gpd, Industrial Users must be able to demonstrate that such wastewaters comply with the respective effluent limits and other terms and conditions of the MIU or SIU GP, and the requirements of the local POTW Authority. The permittee should maintain records of monitoring data that are representative of the current discharge. (See footnote 1 of the MIU GP's Table 5-3 and footnote 1 of the SIU GP's Table 5B-3.)

19) Question: Under which category of wastewater does laboratory wastewater fall?

Answer: Laboratory wastewater is considered an "other process wastewater". Discharge characteristics of laboratory wastewater can differ widely from lab to lab. Lab procedures must prohibit the discharge of any of the pollutants from RCSA 22a-430-4 Appendix B, Tables II, III, V and Appendix D unless an effluent limit has been established in the general permit.

20) Question: Do I need to list the wastewater for any non-process wastewater category less than 5,000 gpd in the MIU GP Notification Form or the SIU GP Registration Form?

Answer: Yes. Once a permittee is required to notify the POTW Authority or CT DEEP of a non-domestic discharge, all such discharges must be represented in the MIU GP Notification Form or SIU GP Registration Form.

21) Question: We are wondering if we will need to list the noncontact cooling water for our emergency generators in the MIU GP Notification Form or the SIU GP Registration Form which, if run 24 hrs/day, will exceed 5,000 gpd. That has happened twice in the last few years due to Storms Irene and Sandy.

Answer: Yes, include these potential discharges on the MIU GP Notification Form or the SIU GP Registration Form.

22) Question: I work at several sites that have several noncontact cooling water discharges whose cumulative flow is greater than 10,000 gpd. Having to make provisions to sample all 10+ discharges will present a challenge.

Answer: In the MIU GP, noncontact cooling water is considered a non-process wastewater and does not have a required monitoring frequency. In the SIU GP this discharge would require quarterly monitoring. Section 5B(b)(7) of the SIU GP states that where multiple sources of a specific category of process or non-process wastewater not subject to Categorical Pretreatment Standards are generated at a site, only one sample from a single representative source is required.

23) Question: For facilities affected in any way by the Pandemic is there a way to petition CTDEEP for an extension of the January 29, 2021 deadline for submittal of the MIU GP Notification Form or the SIU GP Registration Form in case more time is needed to adequately complete all of the required documentation that a complete notification/registration requires?

Answer: DEEP Commissioner Katie Dykes has issued an order, in accordance with Governor Ned Lamont's Executive Orders 9L, 9A and 7M, extending the deadline for submission of the notification form required by the *General Permit for Discharges from Miscellaneous Industrial Users* (MIU GP) and the registration form required by the *General Permit for the Discharge of Wastewaters from Significant Industrial Users* (SIU GP) by ninety (90) days. This extends the deadline for submission of the MIU GP notification form and the SIU GP registration form from January 29, 2021 to April 29, 2021.

Nothing in the order shall excuse full compliance with all other requirements of the MIU GP and the SIU GP while the submission of these documents is pending in accordance with the order.

Part II-- Questions Pertaining to the MIU GP

MIU-1) Question: The MISC GP offered Group III wastewater discharges that required no registration at any flow. Does the MIU GP offer this same group?

Answer: No. All of the Group III wastewater discharges from the MISC GP are now considered Group II Non-process wastewater discharges in the MIU GP and have a threshold of 5,000 gpd below which no notification to the applicable POTW Authority is required. Note that all flows of Vehicle Maintenance wastewater require Notification to the applicable POTW.

MIU-2) Question: To authorize my Miscellaneous Industrial wastewaters, to whom do I submit Notification Forms?

Answer: Notification Forms must be submitted to “each applicable POTW authority” (page 11 of 72 in the MIU GP).

MIU-3) Question: What does each “applicable POTW Authority” mean?

Answer: In some municipalities, the discharge may have sanitary sewer service, but the receiving wastewater treatment facility (also known as Publicly Owned Treatment Works or POTW) is located in a different municipality. In such cases, the Industrial User seeking authorization to discharge must submit a complete MIU GP Notification to both municipalities. “Applicable POTW Authority” means the POTW Authority with jurisdiction over the POTW which receives or will receive the subject discharge. (page 36 of 72 in the MIU GP).

MIU-4) Question: How do I find the contact information for each applicable POTW Authority?

Answer: The back of the Instructions for the Discharge Notification Form to POTW Authority contains a list of municipalities arranged alphabetically that provides the contact information for either the receiving POTW Authority or the chair of the Water Pollution Control Authority for that municipality or both. Generally, the receiving POTW Authority will accept the Notification Forms, but if both the receiving POTW information and the Water Pollution Control Authority information are listed for a municipality, the Industrial User should contact the receiving POTW Authority to determine to whom the Notification Form should be sent. Alternatively, check the Towns’ websites for updated contact information.

MIU-5) Question: Does every MIU GP Notification Form for an MIU wastewater that requires treatment need certification by a Qualified Certified Hazardous Materials Manager (QCHMM) or Qualified Professional Engineer (QPE)?

Answer: No. On page 14 of 72, the MIU GP indicates that Qualified Professional Certification is not required for a pre-engineered treatment system that:

- (a) has been supplied with documentation from the manufacturer(s) demonstrating that such pre-engineered treatment system is designed to treat the pollutant levels in the wastewater discharge at the maximum discharge flow rate, and that such discharge will comply with the effluent limits and conditions of Section 5(a) of this general permit; and
- (b) has been supplied with an Operation and Maintenance Plan from the manufacturer for such pre-engineered treatment system and supplemented as may be required by the Industrial User to meet the requirements of section 5(e)(2) and Appendix B of this general permit; and
- (c) has an integrated spill prevention and control system which, at a minimum, is capable of containing at least 110% of the volume of the largest system component, or is installed in an area that provides such containment.

MIU-6) Question: Are the definitions for QCHMM and QPE in the MIU GP different from what they were in the MISC GP?

Answer: Yes, the definitions are different than they were in the MISC GP. In the MIU GP, the QCHMM and the QPE who prepares the Notification Form and supporting documentation for a facility can also be the QPE or QCHMM who signs Attachment B, the Qualified Professional Certification. (Note: this is NOT true in the SIU GP.)

MIU-7) Question: Where in the MIU GP does it say that receipt of the attachments to the Notification Form is optional?

Answer: The POTW Authority will determine which attachments are required. As stated in the first paragraph in Section 4(a)(3) on page 11 of 72 of the MIU GP, "If required by the applicable POTW Authority, the attachment shall be submitted with the notification."

MIU-8) Question: If my discharge is a transported wastewater, do I still need to complete the table of flows in Item #6 of the MIU GP Notification Form?

Answer: When the discharge is a transported wastewater, the Industrial User skips completing the tables of flow in Item # 6, because they will be indicating discharge volume in the table in Attachment A to the Notification Form. A transported wastewater must still be classified as either a process or non-process wastewater, which will then determine monitoring requirements for the discharge.

MIU-9) Question: For the Discharge Analysis, does CT DEEP want samples to be taken within the 90 days prior to January 29 or can some be sampled or submitted after January 29?

Answer: CT DEEP's expectation is to have Industrial Users obtain a representative sample of the discharge during the 90 days before submittal of the MIU GP Notification Form. Where such discharges are infrequent/intermittent, results should be submitted as soon as possible, or as otherwise may be directed by the applicable POTW Authority.

MIU-10) Question: Will I need to pay a Notification Fee when I submit my Notification Form?

Answer: CT DEEP is not requiring a notification fee, but each applicable POTW Authority will determine if they will charge a Notification Fee.

MIU-11) Question: How do I report a permit violation?

Answer: See Section 5(d) on page 24 of 72 of the MIU GP.

MIU-12) Question: Under Section 5(d)(1) of the MIU GP, it looks as though any violation of an effluent limitation or another condition of the general permit needs to be reported immediately to the local POTW Authority(ies) and CTDEEP, whereas under the previous MISC GP, only potentially more serious violations that could cause upsets to the POTW, etc. had to be reported immediately. Is it true that any violation now needs to be reported immediately?

Answer: Yes, any violation of an effluent limitation or another condition of the general permit needs to be reported immediately to the local POTW Authority(ies) and to

CTDEEP. We draw our basis for this requirement from 40 CFR 403.12(g)(2) which requires Industrial Users to report all violations to the Control Authority w/in 24 hrs.

MIU-13) Question: It is unclear whether the written reporting requirements in Section 5(d)(2)(B) of the MIU GP only apply to the violations described in Section 5(d)(2)(A) or to “any violation of an effluent limitation or another condition of the general permit.” Please confirm.

Answer: The written reporting requirements in Section 5(d)(2)(B) of the MIU GP apply to any violation of an effluent limitation or another condition of the general permit.

Part III-- Questions Pertaining to the SIU GP

SIU-1) In the SIU GP, Section 4(c)(2)(J)(ii)(b) (Page 14 of 91) indicates that new screening samples collected w/in the last 6 months are required “For existing discharges previously authorized by an individual permit”. However, Part 12.c. of the SIU GP registration forms (and instructions) does not make this distinction, thus indicating that this requirement applies to all (non-categorical) registrants. Which is correct?

Answer: Pursuant to Section 4(g), the Commissioner may ask for additional information, and DEEP has determined that screening applies to all existing discharges, whether previously authorized by an individual permit or by a general permit. Screening of wastewater discharges as part of the registration process is a method by which the applicant verifies that all wastewaters discharged to the POTW are compliant with the effluent limits and conditions of the general permit.

SIU-2) Question: In the SIU GP, is there any minimum threshold based on max daily flow (i.e., 1,000 GPD) below which a discharge does not require screening, or does the screening apply for all discharges included in the SIU registration?

Answer: There is no minimum flow below which a discharge does not require screening; all discharge flows in the SIU GP registration require screening. Similar to the previous question, screening applies to each wastewater category seeking authorization under the SIU GP. All screening samples must be representative in all respects, including without limitation chemically and thermally, of the wastewater during routine operating conditions. Where multiple sources of a specific category of process or non-process wastewater not subject to Categorical Pretreatment Standards are generated at a site, only one set of screening samples from a single representative source is required. If various categories of process or non-process wastewater that are not subject to Categorical Pretreatment Standards comingle at a compliance point, the registrant or their consultant will need to isolate each wastewater category for screening.

Keep in mind that each wastewater category (e.g water treatment wastewater or food processing wastewater) can have different types of wastewater within that category for the purposes of screening. For example, water treatment wastewater resulting from filter backwash is a different type of water treatment wastewater compared to that which results from ion exchange regeneration.

SIU-3) Question: EPA and other agencies have stated that PFAS may be a component of chemicals used in metal finishing operations, i.e., possibly in the wastewater. Section 4(c)(2)(J)(ii)(d) of the SIU GP speaks about emerging contaminants. With no 40CFR136 approved method for analysis of PFAS in process chemicals or wastewater, what is a metal finisher to say on the registration?

Answer: Applicants should be questioning their materials providers about the presence of PFAS in their products. If PFAS contaminants are present, applicants should note their presence at #11 in Attachment F of the SIU GP Registration Form, including individually identified PFAS components and their suspected concentration. Without a 40 CFR 136 approved method or a method recommended by the Connecticut Department of Public Health to analyze for PFAS, CT DEEP will not currently ask applicants to sample for PFAS. However, should methods to analyze for PFAS be approved, CT DEEP reserves the right to request analysis for PFAS during the permit term.

SIU-4) Question: Can an applicant registering under the SIU GP use an approval from a POTW for a discharge issued under the MISC General Permit?

Answer: No. The SIU GP is a new permit and all registrants are expected to obtain a new "Attachment D--Approval for Connection/Transport to a POTW".

SIU-5) Question: Section 5B(b)(2) of the SIU GP indicates that certain discharges are exempt from monitoring (building maintenance wastewater, fire suppression testing wastewaters, etc.). Does this also apply to the screening required under the SIU GP?

Answer: No. Registrants are reminded that each registration under the SIU GP requires certification by both the registrant and either a Qualified Professional Engineer or a Qualified Certified Hazardous Materials Manager that the activity authorized under the SIU GP "will comply with the terms and conditions" of the SIU GP. Screening is the best method for registrants and their qualified professionals to determine that discharges registered under the SIU GP are compliant with the terms and conditions of the SIU GP during registration.

SIU-6) Question: The SIU GP registration requires a site plan, process flow diagram, and water balance diagram (Attachments E, I & J) for all discharges at a facility. Are these items necessary for non-process and small process (water softener

regeneration, small RO reject that are used to supply boiler feed water) when the facility's SIU discharge(s) are covered by an individual pretreatment permit that will be maintained ?

Answer: Yes. CT DEEP expects those attachments in the SIU GP registration. Under an individual permit, the applicant is already required to submit a site plan, process flow diagram and water balance diagram. We believe that elements of those plans pertaining to non-process wastewaters should not be too difficult to add to the existing site plan, process flow diagram and water balance diagram.

SIU-7) Question: Page 14 of the SIU GP registration form and Section 5B(b) of the SIU GP identify building maintenance wastewater as non-process wastewater. However, the definition of process wastewater in Appendix A identifies building maintenance wastewater as process wastewater. How do we determine if building maintenance wastewater is process or non-process wastewater?

Answer: The determination of whether building maintenance wastewater is a process or a non-process wastewater depends on what was being cleaned and where the building maintenance wastewater was generated. A floor washdown in an office setting where no manufacturing is taking place is more likely to be a non-process wastewater. However, a floor washdown in a manufacturing setting where metal pieces are being cut or ground and lubricating oils are spilling onto the floor might produce a building maintenance wastewater considered a process wastewater.

It is important to closely read the first sentence in the 'process wastewater' definition. A representative sample of the building maintenance wastewater will help in the determination of whether the discharge should be a process or non-process wastewater.

SIU-8) Question: A permittee with Group I Process Wastewater Discharges >25,000 gpd as defined in the MIU/SIU general permits, but they are not designated as SIU in the table entitled "Permitted Industrial Users that Discharge to POTWs in Connecticut" found on DEEP's [Industrial Wastewater](#) webpage. Does that mean that the CTDEEP has determined that they are not an SIU?

Answer: No, the Miscellaneous GP did not necessarily define who is an SIU. The new SIU definition is applied going forward to determine SIU/MIU general permit eligibility. (Please see the "Qualifying Statements" tab of the table entitled "**Permitted Industrial Users that Discharge to POTWs in Connecticut**" on the Industrial Wastewater webpage. It explains that the data in the table was captured on 1/15/19; it is a static table; and it represents the information available at that time.)

SIU-9) Question: How does a permittee petition the CTDEEP for a change in designation from a Significant Industrial User to a non-SIU?

Answer: DEEP has intentionally taken a conservative approach in how it made such designations, and there is little expectation that we will deviate from such at this time.

A permittee may submit a letter requesting consideration for a change in designation. There are no prescribed forms.

We expect to grant such changes in designation rarely, and only after a review of all relevant factors for a given Significant Industrial User. Any request for reclassification of an SIU to a non-SIU must be thoroughly evaluated by DEEP through an on-site inspection to determine if there is any reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement due to accidental spills, operational problems, or other causes. (See Section 2.2 of EPA's [Industrial User Permitting Guidance Manual](#), 833-R-12-001A September 2012).

SIU-10) Question: Is there a simpler process for facilities to petition to be classified as a non-SIU, if the SIU designation is simply because the discharge is comprised of process wastewater at a cumulative maximum daily flow >25,000 gpd?

Answer: No. Process wastewaters with a cumulative maximum daily flow >25,000 gpd is the main criteria by which a facility would be designated as an SIU. See the response to question SIU-10, above.

SIU-11) Question: If my discharges were authorized under either the former *General Permit for the Discharge of Wastewaters from Categorical Industrial Users to a Publicly Owned Treatment Works (Categorical GP)* or former *General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater (MISC GP)*, I know or suspect that my facility is a Significant Industrial User, and I will be registering those same discharges for authorization under the SIU GP, will I still be able to submit monitoring results in December 2020 for monitoring performed during November 2020?

Answer: Yes. Permittees under the former Categorical GP (registration numbers beginning with CTCIU) or MISC GP (registration numbers beginning with CTMIU) will still be able to submit their monthly or quarterly monitoring data through NetDMR if they will be submitting a registration under the SIU GP. They will use their old registration number (CTCIUxxxx or CTMIUxxxx) until their SIU GP registration is approved at which time their registration number will begin with CTSIU. We suggest they attach a cover letter of explanation, and if the SIU GP requires additional monitoring requirements, attach those results as well.

SIU-12) Question: For the SIU GP Registration, can you clarify requirements for an O&M Plan for facilities that only collect non-process wastewater via piping and direct it to sanitary sewer with no treatment involved?

Answer: The plan might address items such as basic housekeeping; any BMPs required by the SIU GP; inspection, testing, and maintenance of valves, plumbing, pumps, etc.; how to handle spills and releases; and any other applicable elements from Appendix B.

SIU-13) Question: For SIU GP Registration, is there a simpler O&M Plan that can be used for facilities where the only treatment involved is pre-engineered, i.e. filtering photo processing wastewater/water softener wastewater?

Answer: O&M/Service manuals for pre-engineered systems can be used, but the plan must be augmented to include all Appendix B information and incorporate applicable BMPs required by the SIU GP.

SIU-14) Question: If a facility designated as an SIU is only registering under the SIU GP for non-process wastewater like boiler blowdown or noncontact cooling water, are the O&M and SPC Plan checklists required?

Answer: Yes. If the facility has an O&M Plan and/or the SPC Plan because they have an individual permit, those plans can be augmented as needed to include information relevant to the discharges covered by the SIU GP; then the checklists can be completed by referencing the applicable sections/pages.

SIU-15) Question: For the SIU GP, if a facility is not registering any categorical discharges and all other discharges are under the required monitoring thresholds, is Attachment F of the registration required?

Answer: Yes, Attachment F is required. There is no minimum flow threshold exempting completion of Attachment F of the SIU GP Registration Form.

SIU-16) Question: How do we know which sample is representative of average and which is representative of anticipated maximum effluent pollutant concentrations? For example, Boiler Blowdown is typically sampled at a time the blowdown occurs, so it is difficult to tell at which time the blowdown is high and at which times it is low. Much the same situation applies to noncontact cooling water and HVAC Blowdown discharges.

Answer: The obligation is to obtain representative samples of the discharge(s) both “typical daily” and “anticipated maximum” effluent pollutant concentrations. Through the consultant’s and the registrant’s knowledge of the facility’s operations, do your best to determine when to take a sample of the anticipated maximum effluent pollutant concentration. This might involve a review of past monitoring data, and if necessary, a robust sampling effort. The registration is identifying the minimum screening requirements a registrant should consider to be able to verify compliance with the permit’s limits and conditions.

We understand that some discharges will be uniform and constant. In those cases, the two screening results will differ little from one another. If these results are well below the permit’s effluent limit, there will likely be little concern on the part of the registrant or CT DEEP. If these results are close to the permit’s effluent limit, the registrant might want to consider treatment to ensure compliance with the permit.

Keep in mind that the Qualified Professional is certifying that they have made an affirmative determination that “the Operation and Maintenance Plan, the Spill Prevention and Control Plan and the Solvent Management Plan, if applicable...are adequate to assure that the activity (discharge) authorized under this general permit, **if implemented in accordance with such plans**, will comply with the terms and condition of such general permit.”

SIU-17) Question: What if a site is subject to 40 CFR 433, but they don’t discharge the metal finishing wastewater? They generate only a small amount and it is drummed and shipped off site for treatment. Would they still have to register under the SIU for their miscellaneous sources that are discharged?

Answer: Yes. See section 2.2 of EPA’s [Industrial User Permitting Guidance Manual](#).

SIU-18) Question: For SIU GP Registration, if screening sampling is required, do facilities need to sample all sources of wastewater or can they follow the permit sampling requirements, and collect one sample per category and presume that it would be representative of all other similar discharges?

Answer: Please see the response to question #SIU-2 above.

SIU-19) Question: How long does DEEP anticipate it will take to issue an approval of the SIU GP?

Answer: The SIU GP registration processing timeframe goal is up to 6-months, but may take less time for re-registrants with no changes. It largely depends on the completeness of the application submitted.

SIU-20) Question: Will DEEP rely on the QPE/QCHMM stamp or will they perform their own review?

Answer: QPE/CHMM review and certification will be relied upon for validating submitted information and processing of registrations. DEEP staff will be reviewing the registration for completeness and to ensure there is consistency in the information provided throughout the registration that demonstrates ability to comply with the SIU GP requirements. Pursuant to the Connecticut General Statutes, 22a-430b(e), the Commissioner always has the authority to audit any certification made by a qualified professional.

SIU-21) Question: If a facility has authorized discharges under the SIU GP and plans on adding a new process (for example plating line, etc.) that requires DEEP approval prior to discharge, can there be a process for expedited approval?

Answer: There is no particular procedure for expediting approval for a process modification, but we do try to accommodate new business requests. The length of processing time will largely depend on the complexity of the request.

SIU-22) Question: Who is the primary contact at DEEP for questions related to SIU GP?

Answer: Melissa Blais, P.E.,
Supervising Sanitary Engineer
melissa.blais@ct.gov

SIU-23) Our SIU GP registration is nearly complete, but it does not appear that we will be able to submit it by April 29, 2021. Should we submit a partial SIU GP registration and follow up with the rest later?

Answer: In order to meet the authorization requirements of Section 3(e) of the SIU GP, a reregistrant must file a timely and **sufficient** registration with the commissioner.

Submittal of a partial or otherwise insufficient SIU GP registration by the April 29, 2021 deadline does not extend any legal authorization to discharge beyond such deadline.

Furthermore, submittal of a partial registration risks possible rejection by the Department of such registration and the forfeiture of the registration fee.

If a reregistrant seeking to continue their discharge will not meet the registration deadline, the Department is advising that such reregistrant submit a notification of noncompliance signed by a responsible corporate officer that:

- provides the former permit number that authorized the discharge (or note that the discharge was previously authorized under the MISC GP but below registration thresholds);
- explains the cause of the delay;
- outlines steps being taken to complete the registration, and
- identifies when a complete registration will be submitted.

Email the notification (digital signature) to:

DEEP.IndustrialWastewaterGeneralPermits@ct.gov

Also email a copy to each applicable POTW Authority.

Failure to provide notification of noncompliance with the registration deadline may subject you to enforcement and penalties for discharging without a permit.

SIU-24) Question: What is the preferred method of submittal for SIU GP registrations, on paper or by email?

Answer: Please submit a paper copy of the SIU GP registration addressed to the CT DEEP Central Permit Processing Unit and an electronic copy of the SIU GP registration to:

DEEP.IndustrialWastewaterGeneralPermits@ct.gov

SIU-25) Question: If my facility is already submitting monitoring reports by way of NetDMR, do I need to submit a new Subscriber Agreement?

Answer:

- If the Industrial User will be using the same individual or individuals to submit the discharge monitoring reports through NetDMR (subscriber(s)) who were listed in the original subscriber agreement, and
- The subscriber(s) cited above are employees of the permittee (i.e., are not consultants), please submit a copy of the previously submitted Subscriber Agreement with the registration. If you do not have a copy of the original Subscriber Agreement, please file a new one.

After the Industrial User's submitted SIU GP Registration Form is processed at DEEP and the SIU GP Approval of Registration is signed, monitoring parameters will be entered into the NetDMR system for the new SIU

registration. At that point, the Industrial User's subscriber will then need to "request" the new monitoring reporting screens for the new registration through NetDMR.

SIU-26) Question: My facility conducts metal finishing. We are maintaining our metal finishing discharge under an SPDES individual permit while also registering our non-categorical discharges under the SIU GP. We have a Solvent Management Plan already approved under the individual metal finishing permit. Do we need to submit the Solvent Management Plan with our SIU GP registration?

Answer: No, you do not have to submit the approved Solvent Management Plan with your SIU GP registration because the SIU GP registration is not being submitted to authorize metal finishing wastewater.

SIU-27) Question: If a facility has a categorical process with zero discharge, and they're registering their non-categorical discharges under the SIU, do they need to have a Spill Prevention and Control Plan and to demonstrate that with the Attachment L Checklist?

Answer: Yes, the SPCP is a requirement for all SIU GP registrations and the Attachment L checklist is required as well. RCSA 22a-430-4(c)(10) is the basis for this requirement.

SIU-28) Question: May I, as a QPE or QCHMM (Qualified Professional), be a subcontractor to the consultant who is preparing the SIU Registration as long as I act independently from the consultant?

Answer: The Department does not preclude a Qualified Professional from being a subcontractor to a consultant. It is imperative that the Qualified Professional exercise its professional judgement in making the requisite certification independently from any contractual or other business arrangements such Qualified Professional may have with the registrant or a consultant.

SIU-29) Question: Can you please provide a separate blank Attachment F from the SIU GP registration form so that we may attach a separate Attachment F for each discharge conveyed through a separate lateral?

Answer: Yes, we have included a separate Attachment F you can use at the [Water Discharge Permits and Licenses webpage](#) in the SIU GP row in the last column to the right titled 'Required Common Forms'.