



PRETREATMENT PERMIT

issued to

Bridgeport Energy LLC
10 Atlantic Street
Bridgeport, CT 06604

Location Address:

10 Atlantic Street
Bridgeport, CT 06604

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

following

Permit ID: SP0002330
Effective

Issuance Date]

Expiration Date: Five (5) Years from
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) Bridgeport Energy 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(s)
- (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.
- (H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the CGS).

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:

"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.

"Continuous", as a sample frequency, means data points must be collected and recorded by a continuous monitoring device in at least one-minute intervals for as long as a discharge occurs.

"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", as a sample type, means a grab sample collected with automatic equipment or in-line analysis with automated instrumentation.

"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.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum readings recorded with the continuous monitoring device on the day(s) of sample.

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

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. 201502834 for permit reissuance, received on April 22, 2015, 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. SP0002330, issued by the Commissioner to the Permittee on the issuance date, Application No. 201502834 received by the Department of Energy and Environmental Protection ("Department") on April 22, 2015, 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. 201502834, 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 discharges shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables below.

Table A

Discharge Serial Number: 200					Monitoring Location: 1			
Wastewater Description: Boiler blowdown and boiler drain wastewater								
Monitoring Location Description: Sampling port prior to mixing with DSN 201 and domestic sewage discharge line								
Discharge is to: Bridgeport West Side Water Pollution Control Facility ("WPCF")								
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
Flow Rate (Average Daily) ¹	gpd	----	NA	Daily // Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	200,000	Daily // Monthly	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	200,000	Twice Per Month	Daily Flow	NA	NR	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	NR	NA	----	Twice per Month	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-10.0	Twice per Month	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Temperature ³	°C	NA	NA	NR	NA	----	Twice per Month	Grab
Total Suspended Solids	mg/L	NA	NA	NR	NA	100.0	Twice per Month	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 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 Wastewater discharged under the authority of this permit shall not contain heat in amounts which will inhibit biological activity in the POTW, but in no case heat in such quantities that the influent temperature at the POTW exceeds 104°F (40°C).								
Remarks:								
1) Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.								
2) If "----" is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").								

Table B

Discharge Serial Number: 201 **Monitoring Location:** 1

Wastewater Description: Steam piping clean drains wastewater (Steam turbine casings, high, intermediate, and low main steam piping systems, auxiliary steam piping, hot/cold and start-up/shutdown steam systems)

Monitoring Location Description: Sampling port after the closed cooling water system heat exchanger prior to combining with domestic wastewater

Discharge is to: Bridgeport West Side WPCF

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
Flow Rate (Average Daily) ¹	gpd	----	NA	Daily // Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	33,200	Daily // Monthly	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	33,200	Twice Per Month	Daily Flow	NA	NR	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	NR	NA	----	Twice per Month	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-10.0	Twice per Month	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Total Suspended Solids	mg/L	NA	NA	NR	NA	100.0	Twice per Month	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 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’.

Remarks:

- 1) Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.
- 2) If “----” is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”).

Table C

Discharge Serial Number: 202				Monitoring Location: 1				
Wastewater Description: Floor drains, transformer secondary containment drains, laboratory sinks, condenser drain and boiler blowdown tank containment sump consisting of primarily stormwater, boiler water maintenance drain wastewater, and steam system drain wastewater (Floor washing and equipment drains for the following areas: workshop, steam turbine building, gas turbine building, boiler area, feed water pump house, and fire pump house)								
Monitoring Location Description: Sampling port prior to mixing with DSN 201 and domestic sewage discharge line								
Discharge is to: Bridgeport West Side WPCF								
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
Flow Rate (Average Daily) ¹	gpd	----	NA	Daily // Twice Per Month	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	137,300	Daily // Twice Per Month	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	137,300	Twice Per Month	Daily Flow	NA	NR	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	NR	NA	----	Twice per Month	Grab
Oil & Grease, Non-polar Material	mg/L	50.0	100.0	NR	Grab Sample Average	150.0	Twice Per Month	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-10.0	Twice per Month	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Total Suspended Solids	mg/L	NA	NA	NR	NA	100.0	Twice per Month	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 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'.								
Remarks:								
1) Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.								
2) If "----" is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").								

- (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.
- (D) There shall be no polychlorinated biphenyl compounds in the discharge authorized by this permit.
- (E) There shall be no wastewater pollutants from fly ash transport water in the discharge authorized by this permit.
- (F) There shall be no chemical metal cleaning wastewaters in the discharge authorized by this permit.

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) 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.
- (D) 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 submitted in NetDMR by the last day of the month following the month in which samples are taken.
- (E) 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.

(F) DMR Reporting Requirements

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(D) of this permit.

DMRs shall be submitted electronically no later than the last day of the month following the required sampling 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. 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>.

- (G) 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) **Noncompliance Notifications:**

- (1) In accordance with Sections 22a-430-3(j)(8), 22a-430-3(j)(11)(D), 22a-430-3(k)(4), and 22a-430-3(i)(3) of the RSCA, the Permittee shall notify the Commissioner of the following actual or anticipated noncompliance with the terms or conditions of this permit within two hours of becoming aware of the circumstances. All other actual or anticipated violations of the permit shall be reported to the Commissioner within 24 hours of becoming aware of the circumstances:
 - a. A noncompliance that is greater than two times an effluent limitation;
 - b. Any condition that may endanger human health or the environment;
 - c. Any condition that may endanger the operation of a POTW, including sludge handling and disposal;
 - d. A failure or malfunction of monitoring equipment used to comply with the monitoring requirements of this permit;
 - e. Any actual or potential bypass of the Permittee's collection system or treatment facilities; or
 - f. Expansions or significant alterations of any wastewater collection, treatment facility, or its method of operation for the purpose of correcting or avoiding a permit violation.
- (2) Notifications shall be submitted via the Commissioner's online Noncompliance Notification Form: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.
- (3) Within five days of any notification of noncompliance in accordance with Sections 6(A)(1)(a) through 6(A)(1)(f) of this permit, the Permittee shall submit a follow-up report using the

Commissioner's online Noncompliance Follow-up Report Form: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.

The follow-up report shall contain, at a minimum, the following information: (i) A description of the noncompliance and its cause; (ii) the period of noncompliance, including exact dates and times; (iii) if the noncompliance has not been corrected, the anticipated time it is expected to continue; and (iv) steps taken or planned to correct the noncompliance and reduce, eliminate and prevent recurrence of the noncompliance.

- (4) Within 30 days of any notification of facility modifications reported in accordance with Section 6(A)(1)(f) of this permit, the Permittee shall submit a written follow-up report by submitting a "Facility and Wastewater Treatment System Modification Request for Determination" for the review and approval of the Commissioner. The report shall fully describe the changes made to the facility and reasons therefore.
 - (5) Notification of an actual or anticipated noncompliance or facility modification does not stay any term or condition of this permit.
- (B) In accordance with Section 22a-430-3(j)(11)(E) of the RSCA, the Permittee shall notify the Commissioner within 72 hours and in writing within 30 days when he or she knows or has reason to believe that the concentration in the discharge of any substance listed in the application, or any toxic substance as listed in Appendix B or D of RSCA Section 22a-430-4, has exceeded or will exceed the highest of the following levels: (1) One hundred micrograms per liter; (2) Two hundred micrograms per liter for acrolein and acrylonitrile, five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter for antimony; (3) An alternative level specified by the Commissioner, provided such level shall not exceed the level which can be achieved by the Permittee's treatment system; or (4) A level two times the level specified in the Permittee's application.

72 hour initial notifications shall be submitted via the Commissioner's online Noncompliance Notification Form. 30 day follow-up reports shall be submitted via the Commissioner's online Noncompliance Follow-up Report Form. The Forms are available at the Commissioner's website, here: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.

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 or by posting on the Department's public website, 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 as defined by 40 CFR 403.3(v) 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.
- **Best Management Practices (BMPs):** Any other violation or group of violations, which may include a violation of Best Management Practices, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

DRAFT

Jennifer L. Perry, P.E.

Bureau Chief

Bureau of Materials Management and
Compliance Assurance