

Pretreatment Permit Reissuance & Modification
Fact Sheet

APPLICANT	CLICK BOND, INC.
PERMIT NO.	SP0000920
APPLICATION NOS.	201909570 (renewal) 202201778 (modification)
DATE APPLICATIONS RECEIVED	August 28, 2019 (201909570) February 23, 2022 (202201778)
LOCATION ADDRESS	18 Park Road Watertown, CT 06795
FACILITY CONTACT	Laurie Shakley, General Manager, Watertown Plant Operations Office Phone: (860) 274-5435 Email: Laurie.Shakley@clickbond.com
MAILING ADDRESS	18 Park Road Watertown, CT 06795
DMR CONTACT	Laurie Shakley Office Phone: (860) 274-5435 Email: Laurie.Shakley@clickbond.com
PERMIT TERM	5 Years
PERMIT CATEGORY	PRETREATMENT SIGNIFICANT INDUS USER (SIU) PRETREATMENT CATEGORICAL (CIU)
SIC CODES	3471, 3469
NAICS CODE	336413
PERMIT TYPE	Reissuance & Modification
OWNERSHIP	Private
PUBLICLY OWNED TREATMENT WORKS ("POTW") THAT RECEIVES THE DISCHARGE	Discharge to the Waterbury Water Pollution Control Facility ("WPCF") via Town of Watertown collection system. NPDES Permit No. CT0100625. Discharges to the Naugatuck River.
DEEP STAFF ENGINEER	Seth Jones Office Phone: 860-424-3049 Email: seth.jones@ct.gov

DATE APPLICATION PUBLIC NOTICED/ NAME OF PAPER	July 16, 2019, in the Republican-American (Waterbury)
DATE SUFFICIENCY REVIEW COMPLETED	December 2, 2019 (201909570) January 11, 2023 (202201778)
APPLICATION TIMELY AND SUFFICIENT	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
TENTATIVE DECISION FACT SHEET DATE	July 29, 2024

SECTION 1.0 PERMIT FEES

Application Fee (Application No.):

Filing Fee (201909570)	Cost: \$1,300	Date Paid: 08/28/2019
Processing Fee (201909570)	Cost: \$16,900	Date Paid: 11/26/2019
Filing Fee (202201778)	Cost: \$940	Date Paid: 02/23/2022

Annual Fee:

	WASTEWATER CATEGORY (per 22a-430-7)	FLOW CATEGORY	DSN	ANNUAL FEE (per 22a-430-7 and CGS 22a-6f)
	<i>Metal Finishing (to POTW)</i>	>10,000 gpd	201, 202	\$8,425.00
	<i>Blowdown from Heating and Cooling Equipment</i>	All discharges	201	\$4,337.50
TOTAL				\$12,762.50

Note: Floor washing wastewater is non-significant with respect to total facility flow and therefore will be excluded from the annual fees in accordance with RCSA Section 22a-430-7(g).

SECTION 2.0 DECSRIPTION OF WASTE STREAMS

The applicant seeks authorization for the following:

DSN	PROPOSED AVERAGE DAILY FLOW (gpd)	PROPOSED MAXIMUM DAILY FLOW (gpd)	PROPOSED WASTESTREAMS	TREATMENT TYPE	DISCHARGE TO
201	----	16,000	Wastewater from parts cleaning, press stamping, quality control ("QC") lab testing, floor washing, and boiler blowdown	Ultrafiltration and pH adjustment	Waterbury WPCF
202	----	4,000	Passivation and brightening wastewater (rinses and spent solution)	pH adjustment, coagulation, flocculation, solids settling and filtration	Waterbury WPCF

SECTION 3.0 BACKGROUND & PERMIT HISTORY

Click Bond, Inc. is a business that performs metal stamping parts production. The treatment system is used to treat wastewater from metal stamping, parts cleaning,

passivation, and brightening. The POTW did not bring up any issues/concerns with the discharge at the time of the technical review.

The Operation and Maintenance (“O&M”) Plans for DSN 201 and DSN 202 were last revised on November 14, 2023, and November 29, 2023, respectively.

3.1 Solvent Management Plan

Is the facility operating under an approved solvent management plan (SMP)?

Yes No N/A

If yes, indicate date approval was issued: December 21, 2023

3.2 Compliance/Enforcement

3.2.1 Effluent Violations:

See **Attachment A** for a 5-year effluent violations report (2018-2023).

3.2.2 Is the Permittee subject to an ongoing enforcement action? Yes No

3.2.3 Does the Permit contain a compliance schedule (CS)? Yes No

If yes, please check all that apply.

Pollution Prevention Water Conservation Remediation
 Water Quality Requirement Treatment Requirement Other

DEEP is acquiring per- and polyfluoroalkyl substances’ (“PFAS”) concentration data to support further regulatory evaluation regarding the identification of contributing sources of such substances to the state’s publicly owned treatment works (“POTWs”). As such, this permit contains a compliance schedule which requires the permittee to develop and implement a PFAS sampling plan for its discharge.

3.3 Modifications

Within the last five years, have there been any permit modifications?

Yes No

Application No. 202107843

Date Rejected: July 21, 2021

Summary: Rejected request to pipe wastewaters generated from metallurgical testing and fluorescent penetrant inspection in the quality control laboratory into existing discharge, DSN 201-1, in accordance with Section 22a-430-3(i)(2) of the Regulations of Connecticut State Agencies (“RCSA”). This request has been resubmitted to DEEP as a permit modification application (Application No. 202201778).

Application No. 202106995

Date Approved: June 8, 2021

Summary: Authorized to use parts cleaning chemical Mirage EZ 607 in the Ransohoff Parts Washer in place of Lusterclean 40 LF in accordance with Section 22a-430-3(i)(2) of the RCSA. The change was implemented in June 2021.

Application No. 202100324

Date Approved: January 27, 2021

Summary: Authorized to install a new front-loading basket type industrial parts washer in accordance with Section 22a-430-3(i)(2) of the RCSA. The new equipment was installed in March 2021.

Application No. 201908138

Date Approved: July 29, 2019

Summary: Authorized to install 25% caustic soda feed system to be in addition to the existing 50% caustic soda feed system for pH adjustment in the wastewater treatment system (DSN 202) in accordance with Section 22a-430-3(i)(3) of the RCSA. The change was implemented in July 2019.

Application No. 201704708

Date Approved: August 3, 2017

Summary: Authorized to install a new cleaning process utilizing a vibratory tumbling machine. This new cleaning process will remove machining oil and metal contaminants from stainless steel parts. Wastewater generated from the new process will be discharged to the ultra-filtration membrane system for DSN 201-1. This request was approved in accordance with Section 22a-430-3(i)(2) of the RCSA. The new equipment was installed in August 2017.

Application No. 201703850

Date Approved: May 25, 2017

Summary: Authorized to install a ball valve with an actuator downstream of the pH sensor (DSN 202) and a solenoid valve on the air supply to the discharge pump. These valves are only opened when the pH of the treated wastewater is in the range of 8.0-9.5 S.U. This request was approved in accordance with Section 22a-430-3(i)(3) of the RCSA. The change was implemented in June 2017.

3.4 Permits for other Discharges

Click Bond, Inc. has made a No Exposure Certification under the General Permit for the Discharge of Stormwater Associated with Industrial Activity (GSE000074).

SECTION 4.0 THE ON-SITE WASTEWATER TREATMENT SYSTEM

Click Bond, Inc. operates and maintains two separate wastewater treatment systems, one for each DSN:

DSN 201 – Wastewater from press stamping operations, parts washing, boiler blowdown, floor washing, and quality control lab testing (fluorescent penetrant inspection and a mold forming operation) are conveyed to an Abcor ultrafiltration treatment system via the facility's floor trench system. The wastewater is neutralized following ultrafiltration prior to discharge to the sanitary sewer. The system can be run in a continuous or batch configuration.

DSN 202 – Wastewater (rinses and spent baths) generated from a passivating and brightening operation are pumped to a batch treatment system consisting of pH adjustment, coagulation, flocculation, settling, and filtration prior to discharge to the sanitary sewer.

See **Attachment B** for the process flow diagram of the facility.

SECTION 5.0 EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Click Bond initiated the discharge of metal finishing wastewater (DSN 202) after August 31, 1982, the metal finishing regulations proposal date. Therefore, the facility is a new source, subject to the Pretreatment Standards for New Sources (PSNS) in 40 CFR 433.17. DSN 201, which consists of wastewater from ancillary metal finishing operations, was

categorized as metal finishing wastewater subject to 40 CFR 433.17 following the initiation of DSN 202 in accordance with 40 CFR 433.10.

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		DISCHARGE POINT(S)
<input checked="" type="checkbox"/>	Federal Effluent Limitation Guideline (“ELG”) – 40 CFR 403	201, 202
<input type="checkbox"/>	Pretreatment Standards for Existing Sources (“PSES”)	
<input checked="" type="checkbox"/>	Pretreatment Standards for New Sources (“PSNS”) – 40 CFR 433.17	201, 202
<input checked="" type="checkbox"/>	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”)	201, 202
<input checked="" type="checkbox"/>	Case-by-Case Determination using Best Professional Judgment (“BPJ”) RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	201, 202
<input checked="" type="checkbox"/>	Anti-Backsliding – RCSA Section 22a-430-4(l)(4)(D)(vi)	201, 202
<input checked="" type="checkbox"/>	Other (“Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works”, USEPA, 1975-628-875)	201, 202

5.1 MONITORING PARAMETERS & LIMITS:

5.1.1 Local Limits

The Department of Energy and Environmental Protection (“DEEP”) is authorized by the Environmental Protection Agency (“EPA”) to administer the federal pretreatment program at the state-level as allowed by 40 CFR 403.10(e), as both the approval and control authority. EPA provides DEEP that authorization via a modified Memorandum of Agreement (“MOA”) dated June 3, 1981.

In Connecticut, all discharges must comply, at a minimum, with the general and specific prohibitions of the federal pretreatment standards and Section 22a-430-4(t) of the RCSA. To assure such compliance is achieved, state-issued pretreatment permits apply federal categorical and state regulatory standards and effluent limitations. DEEP may also apply additional or more stringent effluent limitations based on Best Professional Judgment pursuant to the RCSA Section 22a-430-4(m), including local limits if such local limits were technically based, to mitigate the risk for a pollutant discharge to negatively impact receiving waters and/or the POTW’s operations, including sludge handling or disposal, worker health or safety, or otherwise interfere with the POTW’s ability to comply with its own NPDES permit.

In accordance with 40 CFR 403.5(c)(2), POTWs shall develop and enforce specific effluent limits for Industrial Users (“IUs”) to both prevent pass through and interference, and to keep the POTW in compliance with their NPDES permit or sludge use or disposal practices. In the State’s MOA with the EPA, the State must “assure that [the] development of specific limits for discharges of prohibited pollutants under 40 CFR 403.5(c) is at least as extensive as would have been required if these POTWs had developed local programs.” To comply with this agreement, the State will only utilize local limits developed technically [40 CFR 122.44(j)(2)(ii)] in accordance with EPA’s July 2004 Local Limits Development Guidance (EPA 833-R-04-002A) in a state permit. Local limits not incorporated into state pretreatment permits remain enforceable by the municipality as allowed by the local sewer use ordinance.

5.1.2 Slug Loading

Connecticut discharge regulations do not allow what is defined as a “slug loading” in 40 CFR 403.8(f)(2)(vi). The items listed in the definition are regulated as a spill or unplanned release under Section 22a-449 of the RCSA and/or as an unpermitted discharge under Section 22a-430 of the RCSA. The Department’s practice of applying instantaneous limits in permits further regulates slug loading. The Department’s various standard regulatory requirements governing including, but not limited to, proper operation and maintenance (RCSA Section 22a-430-3(f)); sludge disposal (RCSA Section 22a-430-3(g)); duty to mitigate (RCSA Section 22a-430-3(h)); facility modification and notification (RCSA Section 22a-430-3(i)); monitoring records and reporting requirements (RCSA Section 22a-430-3(j)); bypass (RCSA Section 22a-430-3(k)); effluent limitation violations (RCSA Section 22a-430-3(m)); resource conservation (RCSA Section 22a-430-3(o)); spill prevention and control (RCSA Section 22a-430-3(p)); instrumentation, alarm, flow recorders (RCSA Section 22a-430-3(q)); equalization (RCSA Section 22a-430-3(r)); and the practice of applying monitoring requirements and instantaneous limits in permits further regulate slug loading.

5.1.3 Effluent Limits

DSN 201

Parameter	Units	40 CFR 433.17			RCSA Section 22a-430-4(s)(2)			CWF (Dilution Factor = 0.991)			BPJ		
		Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Aluminum, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Cadmium, Total	mg/L	0.07	0.11	NA	0.07	0.11	0.75	0.07	0.11	NA	NA	NA	0.11
Chromium, Total	mg/L	1.71	2.77	NA	1.0	2.0	3.0	1.69	2.74	NA	NA	NA	NA
Copper, Total	mg/L	2.07	3.38	NA	1.0	2.0	3.0	2.05	3.35	NA	0.4	0.6	0.9
Cyanide, Total	mg/L	0.65	1.20	NA	0.65	1.2	NA	0.64	1.19	NA	NA	NA	1.19
Flow Rate, Average Daily	gpd	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA	NA
Flow, Maximum during 24 hr period	gpd	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	16,000	NA
Flow, Day of Sampling	gpd	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	16,000	NA
Lead, Total	mg/L	0.43	0.69	NA	0.1	0.5	0.75	0.43	0.68	NA	NA	NA	0.5
Nickel, Total	mg/L	2.38	3.98	NA	1.0	2.0	3.0	2.36	3.94	NA	0.4	0.6	0.9
Oil & Grease, Non-polar Material	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
pH, Day of Sampling	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.0-10.0
pH, Minimum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.0
pH, Maximum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	10.0
Phosphorus, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	----	NA
Silver, Total	mg/L	0.24	0.43	NA	0.1	0.5	0.75	0.24	0.43	NA	NA	NA	0.43
Suspended Solids, Total (“TSS”)	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
Toxic Organics, Total (“TTO”)	mg/L	NA	2.13	NA	NA	NA	NA	NA	2.11	NA	NA	NA	2.11
Zinc, Total	mg/L	1.48	2.61	NA	1.0	2.0	3.0	1.47	2.59	NA	0.47	0.72	1.08

Note: See **Attachment C** for the combined waste stream formula (“CWF”) calculations used to adjust limits in 40 CFR 433.17 to account for non-categorical wastewaters (boiler blowdown and floor washing) in accordance with 40 CFR 403.6(e).

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”).

The following table provides the sampling frequency and additional information regarding the pollutant of concern.

Sample Type	Sample Frequency	Parameter	Comment
Daily Composite Sample RCSA 22a-430-3(j)(7)	Monthly RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	Aluminum, Total	Present in effluent data. Source: metal alloys used in production process
		Chromium, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		Copper, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		Nickel, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
		TSS	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
		Zinc, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process
	Quarterly	Phosphorus	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)) Monitoring only requirement to assist POTW in tracking influent phosphorus concentrations
	Semi-Annually	Cadmium, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e))
		Lead, Total	Monitoring is required by 40 CFR 433.17. Monitoring frequency retained using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Silver, Total		Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years. (40 CFR 403.12(e)(1))	
Grab Sample Average RCSA 22a-430-4(c)(20)	Semi-Annually	Cyanide, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e)(1))
		Oil & Grease, Non-polar Material	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Grab Sample 40 CFR 403.12(g)(3)	Semi-Annually 40 CFR 403.12(e)(1)	Total Toxic Organics	Operating under approved SMP

DSN 202

Parameter	Units	40 CFR 433.17			RCSA Section 22a-430-4(s)(2)			BPJ		
		Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Cadmium, Total	mg/L	0.07	0.11	NA	0.07	0.11	0.75	NA	NA	0.11
Chromium, Total	mg/L	1.71	2.77	NA	1.0	2.0	3.0	NA	NA	NA
Copper, Total	mg/L	2.07	3.38	NA	1.0	2.0	3.0	0.54	0.73	1.09
Cyanide, Total	mg/L	0.65	1.20	NA	0.65	1.2	NA	NA	NA	1.2
Flow Rate, Average Daily	gpd	NA	NA	NA	NA	NA	NA	----	NA	NA
Flow, Maximum during 24 hr period	gpd	NA	NA	NA	NA	NA	NA	NA	4,000	NA
Flow, Day of Sampling	gpd	NA	NA	NA	NA	NA	NA	NA	4,000	NA
Fluoride	mg/L	NA	NA	NA	20.0	30.0	45.0	NA	NA	NA
Lead, Total	mg/L	0.43	0.69	NA	0.1	0.5	0.75	NA	NA	0.5
Nickel, Total	mg/L	2.38	3.98	NA	1.0	2.0	3.0	0.63	0.85	1.28
Nitrogen, Nitrate (Total as N)	mg/L	NA	NA	NA	NA	NA	NA	----	----	NA
Oil & Grease, Non-polar Material	mg/L	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
pH, Day of Sampling	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	6.0-10.0
pH, Minimum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	6.0
pH, Maximum	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	10.0
Phosphorus, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	----	NA
Silver, Total	mg/L	0.24	0.43	NA	0.1	0.5	0.75	NA	NA	0.43
Suspended Solids, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	100.0	150.0
Toxic Organics, Total	mg/L	NA	2.13	NA	NA	NA	NA	NA	NA	2.13
Zinc, Total	mg/L	1.48	2.61	NA	1.0	2.0	3.0	0.47	0.72	1.08

Note: 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").

The following table provides the sampling frequency and additional information regarding the pollutant of concern.

Sample Type	Sample Frequency	Parameter	Comment	
Composite Sample RCSA 22a-430-3(j)(7)	Monthly RCSA 22a-430-3	Chromium, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process	
		Copper, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process	
		Fluoride	Source: brightening process	
		Nickel, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process	
		TSS	BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))	
		Zinc, Total	Monitoring is required by 40 CFR 433.17. Source: metal alloys used in production process	
	Quarterly RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	Phosphorus, Total	Monitoring only requirement to assist POTW in tracking influent phosphorus concentrations	
		Nitrogen, Nitrate	Monitoring only requirement to assist POTW in tracking influent nitrogen concentrations	
		Semi-Annually	Cadmium, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e)(1))
			Lead, Total	Monitoring is required by 40 CFR 433.17. Monitoring frequency retained using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))
Semi-Annually	Silver, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years		
	Grab Sample Average RCSA 22a-430-4(c)(20)	Cyanide, Total	Monitoring is required by 40 CFR 433.17. Absent from discharge for previous 5 years (40 CFR 403.12(e)(1))	
Oil & Grease, Non-polar Material		BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m))		
Grab Sample 40 CFR 403.12(g)(3)	Semi-Annually 40 CFR 403.12(e)(1)	Total Toxic Organics	Operating under approved SMP	

5.2 Permit Limit Development

Aluminum, Total:

DSN 201—There are no applicable limits for aluminum found in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Aluminum is detected in the discharge due to its presence in the metal alloys used in the production process.

Cadmium, Total:

DSN 201—Using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)), the maximum instantaneous limit ("MIL") was carried over from the maximum instantaneous limit ("MDL") because variability is not expected in the discharge.

DSN 202—Using BPJ (RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)), the instantaneous limit was carried over from the MDL because variability is not expected in the discharge.

Chromium, Total:

DSN 201— The monthly monitoring frequency will be retained using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m).

DSN 202—The monthly monitoring frequency will be retained using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m).

Copper, Total:

DSN 201—The existing copper limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSCA Section 22a-430-4(1)(4)(D)(vi). The monthly monitoring frequency will be retained using BPJ in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m).

DSN 202— The existing copper limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSCA Section 22a-430-4(1)(4)(D)(vi). The monthly monitoring frequency will be retained using BPJ since copper is expected present in the discharge in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m).

Cyanide, Total:

DSN 201—The AML and MDL in 40 CFR 433.17 adjusted by the CWF will be used because they are more stringent than the limits in RCSCA Section 22a-430-4(s)(2). Using BPJ (RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the MIL was carried over from the MDL because variability is not expected in the discharge.

DSN 202—Using BPJ (RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the MIL was carried over from the MDL because variability is not expected in the discharge.

Flow:

DSN 201—Click Bond has requested to reduce the maximum daily flow for this discharge from 34,000 gpd to 16,000 gpd.

DSN 202—No changes in flow have been requested.

Fluoride:

DSN 202—Limits from RCSCA Section 22a-430-4(s)(2) have been incorporated into the permit. Using a BPJ determination, in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m), a monthly monitoring requirement will be used in order to align with the monitoring frequencies of other pollutants expected present in the discharge.

Lead, Total:

DSN 201—The limits for lead found in RCSCA Section 22a-430-4(s)(2) will be used for the permit because they are more stringent than those found in 40 CFR 433.17 adjusted by the CWF. Using BPJ in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m), the semi-annual monitoring frequency will be retained, the minimum monitoring frequency allowed by 40 CFR 403.12(e)(1). Additionally, the MIL was carried over from the MDL because variability is not expected in the discharge.

DSN 202—Using BPJ in accordance with RCSCA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m), the semi-annual monitoring frequency will be retained, the minimum monitoring frequency allowed by 40 CFR 403.12(e)(1). Additionally, the MIL was carried over from the MDL because variability is not expected in the discharge.

Nickel, Total:

DSN 201 & DSN 202—The existing nickel limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSCA Section 22a-430-4(1)(4)(D)(vi). The monthly monitoring frequency will be retained

using BPJ in accordance with RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m).

Nitrogen, Nitrate:

DSN 202—Although there are no applicable limits for nitrogen found in 40 CFR 433.17 or RCSA Section 22a-430-4(s), monitoring for nitrate will be maintained from the previous permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(1)(4)(D)(vi). A quarterly monitoring only requirement will be implemented into the permit to assist the POTW in tracking influent nitrogen concentrations. This determination was made using BPJ (RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)).

Oil & Grease, Non-polar Material:

DSN 201 & DSN 202—Based on the recommended maximum limit of 100 mg/L of oil and grease of petroleum and mineral origins, as described in “Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works”, USEPA, 1975-628-875, the MDL of 100.0 mg/L, and maximum instantaneous limit (“MIL”) of 150.0 mg/L for oil & grease, non-polar material, have been incorporated into this permit. Oils and grease are present in the discharges in levels an order of magnitude below the permitted limit, therefore monitoring will be required semi-annually.

Phosphorus, Total:

DSN 201— The monitoring frequency for phosphorus has been increased from semi-annually to quarterly for DSN 201 to align monitoring frequencies for the parameter across both DSNs.

DSN 202—The quarterly monitoring requirement for phosphorus will be retained for this permit cycle to assist the POTW in tracking influent phosphorus concentrations.

pH:

DSN 201 & DSN 202—The permitted pH range of 6.0-10.0 is considered to be protective of the sanitary sewer.

Silver, Total:

DSN 201—The limits for silver in 40 CFR 433.17 adjusted by the CWF and Section 22a-430-4(s) of the RCSA were compared. The AML from Section 22a-430-4(s) of the RCSA and the MDL from 40 CFR 433.17 were utilized as the most stringent limits. Using BPJ (RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the instantaneous limit was carried over from the MDL because variability is not expected in the discharge.

DSN 202—The most stringent limits from 40 CFR 433.17 (MDL), and RCSA 22a-430-4(s)(2) (AML), and previously existing permit limits (MIL) were incorporated into the permit. Using BPJ (RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)), the instantaneous limit was carried over from the MDL because variability is not expected in the discharge.

Total Suspended Solids:

DSN 201 & DSN 202—The existing TSS limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(1)(4)(D)(vi). Using BPJ in accordance with RCSA Sections 22a-430-

4(l)(4)(D)(iii) and 22a-430-4(m), the monthly monitoring for this parameter will be retained in order to ensure continued compliance with the effluent limit.

Total Toxic Organics:

DSN 201 & DSN 202—Click Bond, Inc. operates under an approved Solvent Management Plan. The Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan.

DSN 201—The MIL found in 40 CFR 433.17 was adjusted using the CWF to account for non-categorical wastewater in the discharge.

Zinc, Total:

DSN 201—The existing zinc limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(l)(4)(D)(vi). The monthly monitoring frequency will be retained using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m).

DSN 202—The existing zinc limits will be retained for this issuance of the permit in accordance with the anti-backsliding regulations in RCSA Section 22a-430-4(l)(4)(D)(vi). Using BPJ in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m), the monitoring frequency will be increased from semi-annually to monthly to remain consistent between discharges.

Sample Type:

DSN 202 — Compliance of all parameters other than total cyanide, pH, oil & grease (non-polar material), and TTOs will be monitored using a composite sample consisting of the first 10%, middle 10%, and last 10% of the discharge because the discharge is not sampled using an autosampler and the flowrate is assumed to be constant for the duration of the batch discharge.

SECTION 6.0 E-REPORTING

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 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>.

SECTION 7.0 PUBLIC PARTICIPATION PROCEDURES

INFORMATION REQUESTS

The application has been assigned the following numbers by the Department of Energy and

Environmental Protection. Please use these numbers when corresponding with this office regarding this application.

APPLICATION NO. 201909570

PERMIT ID NO. SP0000920

Interested persons may obtain copies of the application from:

Laurie Shakley
Click Bond, Inc.
18 Park Road
Watertown, CT 06795
(860) 274-5435
Laurie.Shakley@clickbond.com

The application is available for inspection by contacting Seth Jones at seth.jones@ct.gov.

Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

PUBLIC COMMENT

Prior to making a final decision to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within 30 days of this public notice. Written comments should be directed to Seth Jones, seth.jones@ct.gov or Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby and shall hold a hearing upon receipt of a petition signed by at least twenty five persons. Notice of any public hearing shall be published at least 30 days prior to the hearing.

Petitions for a hearing should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. Original signed petitions may be scanned and sent electronically to deep.adjudications@ct.gov or may be mailed or delivered to: DEEP Office of Adjudications, 79 Elm Street, 3rd floor, Hartford, 06106-5127.

All petitions must be received within the comment period noted above. If submitted electronically, original signed petitions must also be mailed or delivered to the address above within ten days of electronic submittal. If a hearing is held, timely notice of such hearing will be published in a newspaper of general circulation. For additional information go to www.ct.gov/deep/adjudications.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act (ADA). If you are seeking a communication aid or service, have limited proficiency in English, wish to file an ADA or Title VI discrimination complaint, or require some other accommodation, including equipment to facilitate virtual

participation, please contact the DEEP Office of Diversity and Equity at 860-418-5910 or by email at deep.accommodations@ct.gov. Any person needing an accommodation for hearing impairment may call the State of Connecticut relay number - 711. In order to facilitate efforts to provide accommodation, please request all accommodations as soon as possible following notice of any agency hearing, meeting, program, or event.

DRAFT

Attachment A: Click Bond 5 Year Effluent Violations Report (2018-2023)

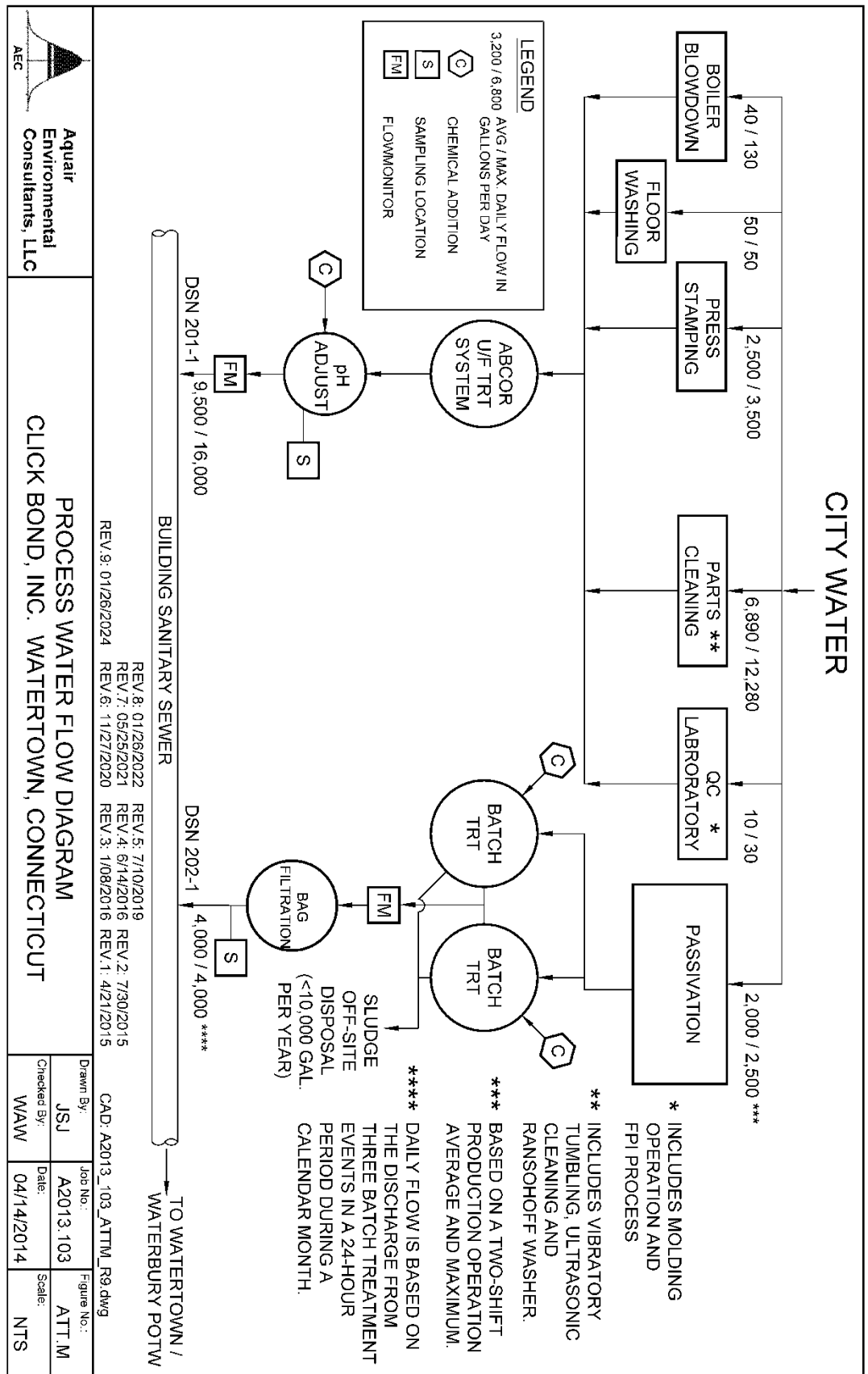
Violation report pulled from Integrated Compliance Information System ("ICIS") on January 31, 2024.

DSN 2021

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
11/30/2021	Nickel, total [as Ni]	DAILY MX	0.8500	1.5800	mg/L
11/30/2021	Nickel, total [as Ni]	MO AVG	0.6300	1.1080	mg/L

DRAFT

Attachment B: Click Bond Process Flow Diagram



Aquair Environmental Consultants, LLC
AEC

PROCESS WATER FLOW DIAGRAM
CLICK BOND, INC. WATERTOWN, CONNECTICUT

Drawn By:	JSJ	Job No.:	A2013.103	Figure No.:	ATT.M
Checked By:	MAW	Date:	04/14/2014	Scale:	NTS

REV. 8: 01/26/2022 REV. 5: 7/10/2019
 REV. 7: 05/25/2021 REV. 4: 6/14/2016 REV. 2: 7/30/2015
 REV. 9: 01/26/2024 REV. 6: 11/27/2020 REV. 3: 10/8/2016 REV. 1: 4/21/2015
 CAD: A2013_103_ATT.M_R9.dwg

Attachment C: Combined Waste Stream Formula Calculation for DSN 201

Click Bond DSN 201 CWF		
Waste Stream	Regulated/Non-regulated Flow (gpd)	Dilute Flow, F_D (gpd)
Parts Cleaning (40 CFR 433.17)	6,890	
Press Stamping (40 CFR 433.17)	2,500	
Boiler Blowdown (dilute)		40
Floor Washing (dilute)		50
QC Lab Testing (40 CFR 433.17)	10	
Total Flow, F_T (gpd)	9,490	
Dilution Factor = $(F_T - F_D)/F_T$	0.991	

The Combined Waste Stream Formula (“CWF”) accounts for the comingling of process and non-process wastewater prior to the sampling location in accordance with 40 CFR 403.6(e). The CWF is based on average flow values for each waste stream as provided in the permit applications.