



PRETREATMENT PERMIT

issued to

Electric Cable Compounds, Inc.  
108 Rado Drive  
Naugatuck, CT 06770

Location Address:

108 Rado Drive  
Naugatuck, CT 06770

Issuance Date: [TBD – Upon Signature]

Effective Date: [1<sup>st</sup> of the Month following  
Issuance Date-for renewals; use  
signature date for new and  
modifications]

**Permit ID:** SP0002467

**Expiration Date:** Five (5) Years from Effective  
Date

**SECTION 1: GENERAL PROVISIONS**

- (A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to Title 40 of the Code of Federal Regulations Part 403 ("40 CFR Part 403").
- (B) Electric Cable Compounds, Inc., ("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) Treatment Requirements for Metals and Cyanide
- (t) Discharges to POTWs - Prohibitions

- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars (\$25,000) may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.

## SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above, the following definitions shall apply to this permit:

"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.

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

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

"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. 202303299 for permit reissuance received on April 11, 2023, 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. SP0002467, issued by the Commissioner to the Permittee on the issuance date, Application No. 202303299 received by the Department of Energy and Environmental Protection ("Department") on April 11, 2023, 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. SP0002467 following the issuance date of this permit.
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the CGS or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or CGS or regulations adopted thereunder which are then applicable.

### **SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

- (A) The discharge shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table(s) below.

**Table A**

**Discharge Serial Number:** DSN 201

**Monitoring Location:** 1

**Wastewater Description:** Rubber processing wastewater (from compounding, extrusion, and pelletizing)

**Monitoring Location Description:** Sample port after final filters, upstairs adjacent to control panel

**Discharge is to:** The Borough of Naugatuck Publicly Owned Treatment Works ("POTW")

| PARAMETER                                      | UNITS | FLOW/TIME BASED MONITORING |                     |                                          |                                           | INSTANTANEOUS MONITORING              |                                          |                                           |
|------------------------------------------------|-------|----------------------------|---------------------|------------------------------------------|-------------------------------------------|---------------------------------------|------------------------------------------|-------------------------------------------|
|                                                |       | Average Monthly Limit      | Maximum Daily Limit | Sample/ Reporting Frequency <sup>2</sup> | Sample Type or Measurement to be Reported | Instantaneous Limit or Required Range | Sample/ Reporting Frequency <sup>2</sup> | Sample Type or Measurement to be Reported |
| Acrolein                                       | ug/L  | ----                       | ----                | Quarterly                                | Grab Sample Average                       | NA                                    | NR                                       | NA                                        |
| Aluminum, Total                                | mg/L  | ----                       | ----                | Twice per month                          | Daily Composite                           | NA                                    | NR                                       | NA                                        |
| Antimony, Total                                | mg/L  | ----                       | ----                | Quarterly                                | Daily Composite                           | NA                                    | NR                                       | NA                                        |
| Arsenic, Total                                 | mg/L  | ----                       | ----                | Quarterly                                | Daily Composite                           | NA                                    | NR                                       | NA                                        |
| Flow Rate (Average Daily) <sup>1</sup>         | gpd   | ----                       | NA                  | Daily//Monthly                           | Daily Flow                                | NA                                    | NR                                       | NA                                        |
| Flow, Maximum during 24 hr period <sup>1</sup> | gpd   | NA                         | 50,000              | Daily//Monthly                           | Daily Flow                                | NA                                    | NR                                       | NA                                        |
| Flow (Day of Sampling)                         | gpd   | NA                         | 50,000              | Twice per month                          | Daily Flow                                | NA                                    | NR                                       | NA                                        |
| Magnesium, Total                               | mg/L  | ----                       | ----                | Twice per month                          | Daily Composite                           | NA                                    | NR                                       | NA                                        |
| Methyl Methacrylate                            | ug/L  | ----                       | ----                | Quarterly                                | Grab Sample Average                       | NA                                    | NR                                       | NA                                        |
| Oil and Grease, Total                          | mg/L  | 50.0                       | 100.0               | Twice per month                          | Grab Sample Average                       | 150.0                                 | NR                                       | 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                             |
| Selenium, Total                                | mg/L  | ----                       | ----                | Quarterly                                | Daily Composite                           | NA                                    | NR                                       | NA                                        |
| Total Suspended Solids                         | mg/L  | ----                       | ----                | Twice per month                          | Daily Composite                           | NA                                    | NR                                       | NA                                        |
| Vinyl Acetate                                  | ug/L  | ----                       | ----                | Quarterly                                | Grab Sample Average                       | NA                                    | NR                                       | NA                                        |
| Zinc, Total                                    | mg/L  | ----                       | ----                | Quarterly                                | Daily Composite                           | NA                                    | NR                                       | NA                                        |

**Table Footnotes:**

<sup>1</sup>For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month.

<sup>2</sup>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 frequently, 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; ug/L means micrograms 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.

**SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS**

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the DMR and reported to the Bureau of Materials Management and Compliance Assurance using NetDMR. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be submitted in NetDMR by the last day of the month following the month in which samples are taken.
- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g. monthly, quarterly, etc.) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.
- (E) DMR Reporting Requirements
  - 1. The Permittee must submit monitoring data and other reports to the Department electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection.
    - a. Submittal of Reports Using NetDMR

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. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs and associated attachments to the Department. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR. NetDMR is accessed from: <http://www.epa.gov/netdmr>.

- (F) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority(ies) ("WPCA") involved in the treatment and collection of the permitted discharge.

**SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS**

- (A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division within

thirty (30) days of the date of the analytical laboratory report identifying the exceedance.

- (B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("POTW"), including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in Section 1(B) of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

## SECTION 7: COMPLIANCE SCHEDULE

- (A) The Permittee shall assure compliance with the terms and conditions of this Permit and Sections 22a-430-3 and 4 of the RCSA in accordance with the following schedule:
  - (1) On or before thirty (30) days after the effective date of this permit, the Permittee shall employ or retain one or more qualified professionals acceptable to the Commissioner to prepare the documents and implement or oversee the actions required by this section of the permit and shall, by that date, notify the Commissioner in writing of the identity of such professionals. Such professionals employed or retained by the Permittee shall have demonstrated knowledge of the per- and polyfluorinated alkyl substances (PFAS) and the sampling protocols and analytical laboratory methods associated with identifying and quantifying PFAS. The Permittee shall employ or retain one or more qualified professionals acceptable to the Commissioner until the actions required by this section of the permit have been completed, and within ten (10) days after employing or retaining any professional(s) other than one(s) originally identified under this paragraph, the Permittee shall notify the Commissioner in writing of the identity of such other professional. The Permittee shall submit to the Commissioner a description of a professional's education, experience and training, which is relevant to the work required by this permit within ten (10) days after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable professional unacceptable.
  - (2) On or before one-hundred and twenty (120) days after the effective date of this permit, the Permittee shall submit for the Commissioner's review and approval a sampling plan on which to take a minimum of two (2) separate and distinct samples of the discharge associated with DSN 201 for analysis. A sampling location must be selected in a location prior to dilution. PFAS analyses shall be performed using the methods approved by EPA pursuant to 40 CFR 136 and by a laboratory certified to conduct such test methods. If no such test method is approved by EPA pursuant to 40 CFR 136, PFAS analyses shall be performed in accordance with either EPA Draft Method 1633 (see <https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas>), or the modified EPA method 537.1 including isotope dilution that follows the Department of Defense's Quality System Manual Table B-15 QA/QC requirements. At a minimum this plan must identify the test method, laboratory, schedule of sampling events, sampling protocols including sample quality control procedures to be implemented, sampling locations, and number and volume of samples to be collected at each location.
  - (3) The Permittee shall perform the approved actions in accordance with the approved sampling plan, but in no event shall the approved actions be completed later than ninety (90) days after the approval of the sampling plan submitted pursuant to Section 7(A)(2) of this permit. Within thirty (30) days after receiving analysis results, the Permittee shall submit all sample results generated as a result of executing the approved plan to the Commissioner in writing.
- (B) The Permittee shall submit to the Commissioner all documents required by this section of the permit in a complete and approvable form. If the Commissioner notifies the Permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the Permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty (30) days of the Commissioner's notice of deficiencies. In approving any document or other action under this Compliance Schedule, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this section of the permit. Nothing in this paragraph shall excuse noncompliance or delay.

- (C) Dates. The date of submission to the Commissioner of any document required by this section of the permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three (3) days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" as used in this section of the permit means calendar day. Any document or action which is required by this section of the permit to be submitted, or performed, by a date which falls on, Saturday, Sunday, or a Connecticut or federal holiday, shall be submitted or performed on or before the next day which is not a Saturday, Sunday, or Connecticut or federal holiday.
- (D) Notification of noncompliance. In the event that the Permittee becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this section of the permit or of any document required hereunder, the Permittee shall notify the Commissioner within 24 hours and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, minimized to the greatest extent possible. In so notifying the Commissioner, the Permittee shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and the Permittee shall comply with any dates, which may be approved in writing by the Commissioner. Notification by the Permittee shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
- (E) Notice to Commissioner of changes. Within fifteen (15) days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this section of the permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the correct or omitted information to the Commissioner.
- (F) Submission of documents. Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit shall, unless otherwise specified in writing by the Commissioner, be directed to:

Department of Energy and Environmental Protection  
Bureau of Materials Management and Compliance Assurance  
Water Permitting and Enforcement Division  
[DEEP.waterpermittingenforcement@ct.gov](mailto:DEEP.waterpermittingenforcement@ct.gov)  
With the subject line: "Attn: Permit No. SP0002467"

## SECTION 8: 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 is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six (66%) percent or more of all measurements taken for the same pollutant parameter during a six-month period exceed (by any magnitude) the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three (33%) or more of all of the measurements taken for the same pollutant parameter during a six-month period equal or exceed the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s) multiplied by 1.4 for BOD, TSS, fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction, or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes

or operations, or its sludge processes, use or disposal.

- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **BMPs:** Any other violation or group of violations, which may include a violation of Best Management Practices, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

Draft

Jennifer L. Perry, P.E.

Bureau Chief

Bureau of Materials Management and Compliance Assurance

JLP/RB

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