DATA TRACKING AND TECHNICAL FACT SHEET

WPED PRETREATMENT PERMIT REISSUANCE

APPLICANT	Electric Cable Compounds, Inc.
PERMIT NO.	SP0002467
APPLICATION NO.	202303299
DATE APPLICATION RECEIVED	April 11, 2023
LOCATION ADDRESS	108 Rado Drive, Naugatuck CT 06770
FACILITY CONTACT	Emma Bleszinski, HES Coordinator Office Phone: (203) 723- 2590, Ext. 342 Email: ebleszinski@eccompounds.com
MAILING ADDRESS	108 Rado Drive, Naugatuck CT 06770
DMR CONTACT	Emma Bleszinski Office Phone: (203) 723- 2590, Ext. 342 Email: ebleszinski@eccompounds.com
PERMIT TERM	5 Years
PERMIT CATEGORY	PRETREATMENT SIGNIFICANT INDUS USER (SIU) PRETREATMENT CATEGORICAL (CIU)
SIC CODE(S)	3087
PERMIT TYPE	Reissuance
OWNERSHIP	Private
PUBLICLY OWNED TREATMENT WORKS ("POTW") THAT RECEIVES THE DISCHARGE	Discharge to Naugatuck POTW. NPDES Permit No. CT0100641 that discharges to the Naugatuck River
DEEP STAFF ENGINEER	Ryan Bellucci Office Phone: (860) 424 - 3741 Email: ryan.bellucci@ct.gov
DATE APPLICATION PUBLIC NOTICED/ NAME OF PAPER	*March 10, 2023 / Republican American*
DATE SUFFICIENCY REVIEW COMPLETED	*July 26, 2023*
APPLICATION TIMELY AND SUFFICIENT	☒ Yes ☐ No
TENTATIVE DECISION FACT SHEET DATE	*December 7,2023*

SOLVENT MANAGEMENT PLAN

Is the facility operating under an approved Solvent Management Plan ("SMP")? ☐ Yes ☐ No ☒ N/A

PERMIT FEES

Application Fee:

Filing Fee	Cost: $1,300.00	Date Paid: 04/12/2023
Processing Fee	Cost: $6,300.00	Date Paid: 06/07/2023

Annual Fee:

	WASTEWATER CATEGORY (per 22a-430-7)	FLOW CATEGORY	DSN	ANNUAL FEE (per 22a-430-7 and CGS 22a-6f)
	Rubber Processing	0 – 50,000 gpd	201	$4,337.50
TOTAL				$4,337.50

I. 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	10,000	50,000	Rubber processing wastewater (from compounding, extrusion, and pelletizing)	Filtration	Borough of Naugatuck POTW

II. BACKGROUND/PERMIT HISTORY

Electric Cable Compounds, Inc. ("ECC") is a business that performs compounding of resins and raw materials to produce polymers to insulate electric cables and wires.

Compliance/Enforcement
Effluent Violations: As identified in table below.

Monitoring Period End Date	Parameter	Permit Limit	DMR Value
12/31/2019	pH, maximum	9.6	10.20
1/31/2020	pH, minimum	6.5	6.00
2/29/2020	pH, minimum	6.5	5.80
11/30/2022	Flow, maximum during a 24 hr. period	30,000	30,185
9/30/2023	pH, minimum	6.5	5.94

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

If yes, provide a brief explanation; include discussions of any issues relevant to the activities regulated under the permit.

NOVWRIN21030 Issued: 12/17/2021 Closed: 1/18/2022

Reason for Notice of Violation ("NOV"): Failed to comply with Section 22a-430-3(j)(11)(C) of the Regulations of Connecticut State Agencies ("RCSA") for failure to submit DMRs for April and May of 2021 by the regulatory deadline. The NOV was closed based on compliance with the cited violations.

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 for specific dischargers 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.

Modifications

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

☑ Yes ☐ No

Application No. 202078836 Date Approved: December 2, 2020

Summary: Authorized replacement of discharge piping with CPVC piping, installation of a new transmitter, pH electrode, and controls, and relocation of the current flow sensor to accommodate the new CPVC piping in accordance with Section 22a-430-3(i)(3) of the RCSA.

III. THE ON-SITE WASTEWATER TREATMENT SYSTEM

Wastewater covered under this permit is generated from product lines 1, 2, 3, and 5. All wastewater is filtered through a 400-micron gala filter and a 25–50-micron Parker Vertical Canister Filter before being pumped into the sanitary sewer.

City water is directed to a Gala tank (250 gallons) present in each manufacturing line to rinse and transfer the polymeric pellets. This water does not come in contact with raw materials. Each gala tank has three Maag Americas 400-micron liquid filter bags which are routinely emptied out into the compound waste bin. Flow is monitored using the Signet Rotor-x paddlewheel flow sensor which displays these values on the Signet 9900 panel-mounted flow transmitter. After the wastewater flows out of the Gala tank, it is filtered through a MSC Filtration 25–50-micron liquid filter bag located in a Parker Canister (> 20 psi). These filter bags are present in process lines 1 and 2 and are changed daily. They are also changed if the flow value reaches 0.0 gpm while pumps are active, or if the pressure gauge on the lid of the parker canister is 20 psi or higher. The wastewater then flows to the water vault before being filtered through another MSC filtration 25-50-micron liquid filter bag located in a Parker Canister. The final filter bags located above the water vault are changed twice a week. After final filtration, the pH is monitored using the Thermo Scientific Aquasensor AnalogPlus Differential pH sensor. The sensor is calibrated weekly and verified using a Triplett PH180 handheld pH meter as well as calibrated annually by an outside contractor. The line 3 wastewater control panel emits a flashing light as well as an audible alarm if the pH values are greater than 9.95 S.U. or less than 6.05 S.U. The pumps are shut off if the pH is outside of this range which triggers an alarm at the wastewater control panel at lines 1 and 2 to notify personnel that the pumps have ceased. The flow is monitored using the Signet Rotor-x paddlewheel flow sensor in lines 1 and 2 before the water flows to the wastewater holding tank. The wastewater holding tank has an audio-visual alarm that is triggered by the high-level float sensor. This triggers an alarm at the wastewater control panels in line 1 and 2 to notify personnel that pumps have turned off. Flow and pH are recorded before effluent is discharged to the sanitary sewer. If the wastewater daily flow exceeds 45,000 gallons, the line 3 wastewater control panel emits an audiovisual alarm that indicates that the daily water discharge limit has been reached.

The Operation and Maintenance (O&M) Plan was last revised on March 17, 2023.

See Attachment A for the Wastewater Transfer System Process Flow Diagram.

See Attachment B for the Water Discharge System Process Flow Diagram

IV. EFFLUENT GUIDELINES

Electric Cable Compounds, Inc. initiated discharge DSN 201 after August 23, 1974, the new source date for rubber processing. Therefore, the discharge is subject to 40 CFR 428.76: Pretreatment standards for new sources.

V. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		DISCHARGE POINT(S)
☒	Federal Effluent Limitation Guideline ("ELG") – 40 CFR 403	DSN 201
☐	Pretreatment Standards for Existing Sources ("PSES")	
☒	Pretreatment Standards for New Sources ("PSNS") 40 CFR428.76	DSN 201
☐	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies ("RCSA")	
☒	Case-by-Case Determination using Best Professional Judgment ("BPJ") RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	DSN 201
☒	Anti-Backsliding – RCSA Section 22a-430-4(l)(4)(D)(vi)	DSN 201
☒	"Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works", USEPA, 1975-628-875	DSN 201

A. MONITORING PARAMETERS & LIMITS:

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 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.

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.

Effluent Limitations & Monitoring Frequency

The following table compares required federal, state, local and best professional limits.

DSN 201

Parameter	Units	40 CFR 428.76			BPJ		
		Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Acrolein	ug/L	NA	NA	NA	---	---	NA
Aluminum, Total	mg/L	NA	NA	NA	---	---	NA
Antimony, Total	mg/L	NA	NA	NA	---	---	NA
Arsenic, Total	mg/L	NA	NA	NA	---	---	NA
Magnesium, Total	mg/L	NA	NA	NA	---	---	NA
Methyl Methacrylate	ug/L	NA	NA	NA	---	---	NA
Oil and Grease, Total	mg/L	NA	**100.0**	NA	**50.0**	**100.0**	**150.0**
pH, Day of Sampling	S.U.	NA	NA	NA	NA	NA	**6.0-10.0**
Selenium, Total	mg/L	NA	NA	NA	---	---	NA
Total Suspended Solids	mg/L	NA	NA	NA	---	---	NA
Vinyl Acetate	mg/L	NA	NA	NA	---	---	NA
Zinc, Total	mg/L	NA	NA	NA	---	---	NA

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	Reason
Daily Composite Sample 22a-430-4(c)(20) of the RCSA	Quarterly RCSA Section 22a-430-4(l)(4)(D)(iii)	Antimony, Total	Expected present in discharge due to antimony in rubber processing materials
		Arsenic, Total	Recommendations from Naugatuck POTW to aid in identifying sources of arsenic
		Selenium, Total	Recommendations from Naugatuck POTW to aid in identifying sources of selenium
		Zinc, Total	Expected present in discharge due to use of zinc oxide in rubber processing operations
	Twice Per Month RCSA Section 22a-430-3	Aluminum, Total	Expected present in discharge due to use of aluminum hydroxide as a raw material
		Magnesium, Total	Expected present in discharge due to use of magnesium hydroxide as a raw material
		Total Suspended Solids	Expected present in discharge. Monitoring required by 40 CFR 428.76
Grab Sample Average 40 CFR 403.12(g)(3)	Quarterly RCSA Section 22a-430-4(l)(4)(D)(iii)	Acrolein	Present in discharge but source is unknown.
		Methyl Methacrylate	Expected present in resins/polymers that comprise raw materials utilized at ECC.
		Vinyl Acetate	Expected present in resins/polymers that comprise raw materials utilized at ECC.
	Twice Per Month RCSA Section 22a-430-3	Oil and Grease, Total	Federal categorical pollutant of concern and present in discharge due to paraffinic oil used in production and machinery lubrication

B. COMMENTS ON SPECIFIC PARAMETERS:

DSN 201

Acrolein: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, acrolein will continue to be monitored in the reissuance of this permit. It has been reported as detectable in effluent reports during the last permit term, but the specific source of acrolein from process operations is currently unknown. There are no monthly, daily, or instantaneous maximum limits associated with acrolein sampling. Carried over from the previous permit, the monitoring frequency will remain quarterly in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m). A grab sample average will be required for acrolein in accordance with 40 CFR 403.12(g)(3).

Aluminum, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, aluminum will be monitored in the reissuance of this permit. It is expected to be present in the discharge due to use of aluminum hydroxide as a raw material and has been reported above detectable levels in

recent effluent reports. There are no limits associated with aluminum for the rubber processing category. The monitoring frequency of twice per month was chosen in accordance with the rubber processing monitoring schedule portion of RCSA Section 22a-430-3. A daily composite sample will be required for aluminum per Section 22a-430-4(c)(20) of the RCSA.

Antimony, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, antimony will be monitored in the reissuance of this permit. It is expected to be present in the discharge due to the use of antimony trioxide in manufacturing SuperOhm4863 and Gexol 1200-4. Antimony has been reported present above detectable levels in recent effluent reports. There are no limits associated with antimony monitoring for the rubber processing category. The monitoring frequency of quarterly was carried over from the previous permit in accordance with 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m). A daily composite sample will be required for antimony per Section 22a-430-4(c)(20) of the RCSA.

Arsenic, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, arsenic monitoring requirements will continue in the reissuance of this permit. It has been reported as nondetectable in the past five years of discharge monitoring reports and is not expected to be present in the discharge. However, the Naugatuck POTW has requested continued monitoring because their NPDES permit contains a compliance schedule requiring a source analysis of arsenic in their discharge. The monitoring frequency has been reduced to quarterly in accordance with sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA. Due to the history of arsenic presence at the receiving POTW, continued monitoring will provide periodic confirmation that no arsenic is being introduced to the POTW resultant of operations at ECC. A daily composite sample will be required for arsenic per Section 22a-430-4(c)(20) of the RCSA.

Magnesium, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, magnesium will be monitored in the reissuance of this permit. It is expected to be present in the discharge due to the use of magnesium hydroxide as a raw material and has been reported above detectable levels in recent effluent self-monitoring data. There are no limits associated with magnesium monitoring for the rubber processing category. The monitoring frequency of twice per month was chosen in accordance with the rubber processing monitoring schedule portion of RCSA Section 22a-430-3. A daily composite sample will be required for magnesium per Section 22a-430-4(c)(20) of the RCSA.

Methyl Methacrylate: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, methyl methacrylate will continue to be monitored in the reissuance of this permit. It has been reported detectable in effluent reports during the last permit term. Methyl methacrylate is used in the production of resins and polymers that comprise raw materials utilized at ECC, but the individual compounds are not used on site. There are no monthly, daily, or instantaneous maximum limits associated with methyl methacrylate sampling. Carried over from the previous permit, the monitoring frequency will remain quarterly in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m). A grab sample average will be required for methyl methacrylate in accordance with 40 CFR 403.12(g)(3).

Oil and Grease, Total: Total oil and grease monitoring will be included in the reissuance of this permit due to the categorical requirements found in 40 CFR 428.76. It is expected to be present in the discharge due to the use of paraffinic oil in production and lubricants used on process machinery. The maximum daily limit found in 40 CFR 428.76 is utilized in reissuance of this permit in accordance with RCSA Section 22a-430-4(l)(4)(D)(vi). Based on the recommended maximum limit of 100 mg/L of oil and grease, as described in "Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works", USEPA, 1975-628-875, the AML of 50.0 mg/L and MIL of 150.0 mg/L for total oil and grease, have been incorporated into this permit. The instantaneous limit was calculated by multiplying the MDL by 1.5 which accounts for the variability of an instantaneous measurement from a single grab sample. The monitoring frequency of twice per month was chosen in accordance with the rubber processing monitoring schedule portion of RCSA Section 22a-430-3. A grab sample average will be required for total oil and grease in accordance with 40 CFR 403.12(g)(3).

Selenium, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA Selenium monitoring requirements will continue in the reissuance of this permit. It has been reported as nondetectable in the past five years of discharge monitoring reports and is not expected to be present in the discharge. However, monitoring will be required at the request of the Borough of Naugatuck POTW, due to effluent limitations for selenium in their NPDES permit. The monitoring frequency has been reduced to quarterly in accordance with sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA. Due to the history of selenium presence at the receiving POTW, continued monitoring will provide

periodic confirmation that no selenium is being introduced to the POTW resultant of operations at ECC. A daily composite sample will be required for selenium per Section 22a-430-4(c)(20) of the RCSA.

Total Suspended Solids: Total suspended solids monitoring will be included in the reissuance of this permit in accordance with 40 CFR 428.76. It has been reported as present above detectable levels in recent effluent self-monitoring data. There are no limits associated with total suspended solids monitoring for the rubber processing category. The monitoring frequency of twice per month was chosen in accordance with the rubber processing monitoring schedule portion of RCSA Section 22a-430-3. A daily composite sample will be required for total suspended solids per Section 22a-430-4(c)(20) of the RCSA.

Vinyl Acetate: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, vinyl acetate will continue to be monitored in the reissuance of this permit. It has been reported as detectable in effluent reports during the last permit term. Vinyl acetate is used in the production of resins and polymers that comprise raw materials utilized at ECC, but the individual compounds are not used on site. There are no monthly, daily, or instantaneous maximum limits associated with vinyl acetate sampling. Carried over from the previous permit, the monitoring frequency will remain quarterly in accordance with RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m). A grab sample average will be required for vinyl acetate in accordance with 40 CFR 403.12(g)(3).

Zinc, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, zinc will be monitored in the reissuance of this permit. It is expected to be present in the discharge due to use of zinc oxide in rubber processing operations and has been reported above detectable levels in recent effluent reports. There are no limits associated with zinc monitoring for the rubber processing category. The monitoring frequency of quarterly was carried over from the previous permit in accordance with 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m). A daily composite sample will be required for zinc per Section 22a-430-4(c)(20) of the RCSA.

Parameters Changed with Reissuance

Chromium, Total: Section 19-83(4) of the Naugatuck Sewer Ordinance suggested the monitoring for total chromium in the last permit. In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, chromium monitoring requirements have been removed in the reissuance of this permit. During the last permit term, samples had a mean value of 0.012 mg/L with a daily maximum concentration of 0.14 mg/L. No comments were received from the Naugatuck POTW on the draft permit and fact sheet regarding the removal of chromium monitoring requirements.

Copper, Total: Section 19-83(4) of the Naugatuck Sewer Ordinance suggested monitoring for total copper in the last permit. In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, copper monitoring requirements have been removed in the reissuance of this permit. During the last permit term, samples had a mean value of 0.0102 mg/L with a daily maximum concentration of 0.102 mg/L. No comments were received from the Naugatuck POTW on the draft permit and fact sheet regarding the removal of copper monitoring requirements.

Cyanide, Total: Section 19-82(2) of the Naugatuck Sewer Ordinance suggested monitoring for total cyanide in the last permit. In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, cyanide monitoring requirements have been removed in the reissuance of this permit. During the last permit term, samples had a mean value of 0.0002 mg/L with a daily maximum concentration of 0.004 mg/L. No comments were received from the Naugatuck POTW on the draft permit and fact sheet regarding the removal of cyanide monitoring requirements.

Iron, Total: Section 19-83(4) of the Naugatuck Sewer Ordinance suggested monitoring for total iron in the last permit. In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, iron monitoring requirements have been removed in the reissuance of this permit. During the last permit term, samples had a mean value of 0.0983 mg/L with a daily maximum concentration of 0.71 mg/L. No comments were received from the Naugatuck POTW on the draft permit and fact sheet regarding the removal of iron monitoring requirements.

pH: Section 19-82(3) of the Naugatuck Sewer Ordinance suggested a pH range of 6.5-9.6 and it was included in the previous permit issuance. In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, pH limits have been changed to a range of 6.0-10.0 S.U. in the reissuance of this

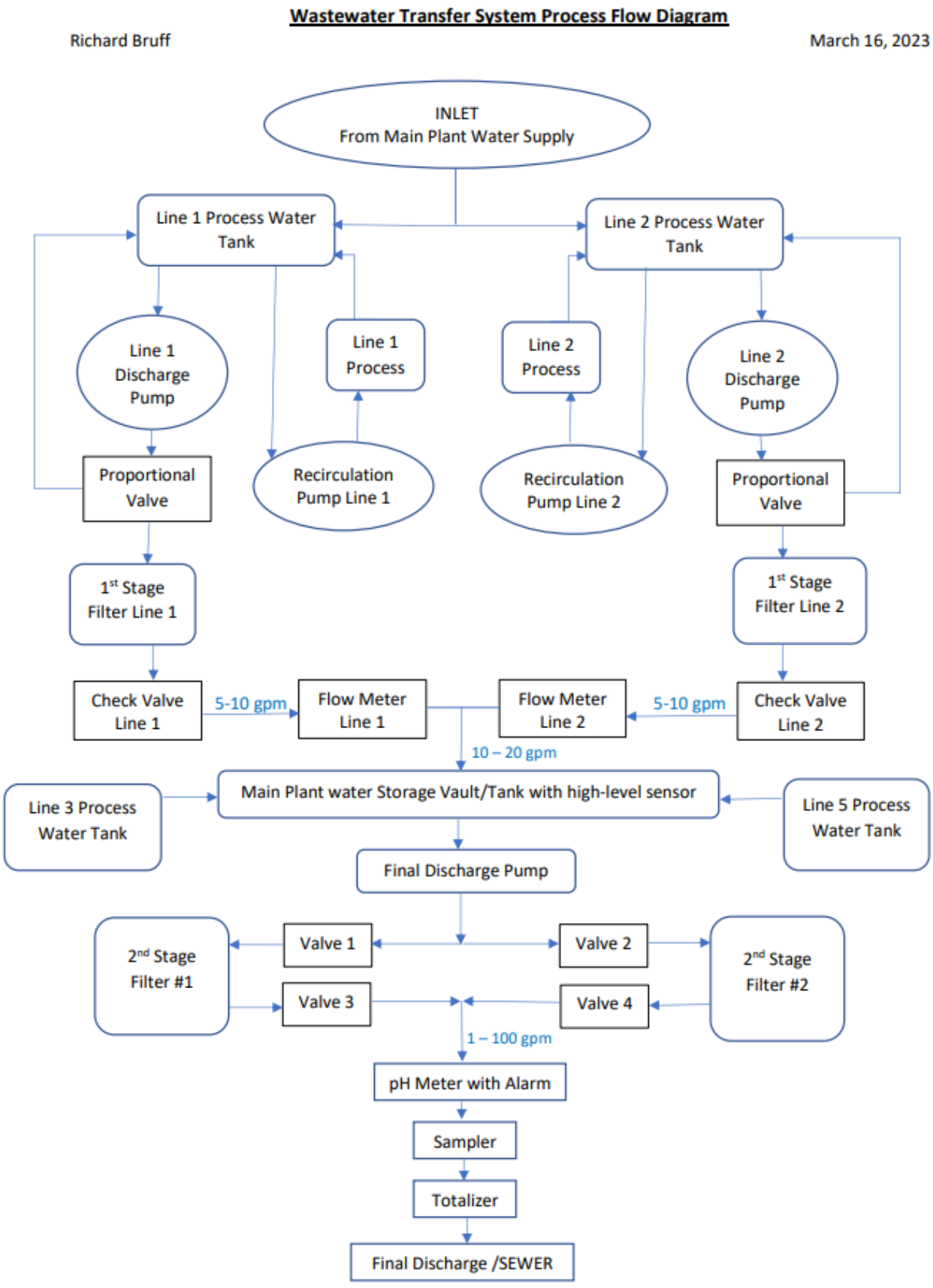
permit. This range will be protective of the sanitary sewer and more accurately represents the allowable range in other recently issued pretreatment permits.

Tin, Total: In accordance with Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m) of the RCSA, tin monitoring requirements have been removed in the reissuance of this permit because tin has not been reported as detectable in the discharge monitoring reports during the last permit term. Based on information provided with the application, is not expected to be present in the discharge. In the previous permit, tin was monitored during the last permit term because it was present in the effluent data reports provided with the permit application. During the last permit term, each sampling event yielded undetectable levels of tin. No comments were received from the POTW on the draft permit and fact sheet regarding the removal of tin monitoring requirements.

VI. PERMITS FOR OTHER DISCHARGES

General Permit for the Discharge of Stormwater Associated with Industrial Activity (GSI002699)

Attachment A: Wastewater Transfer System Process Flow Diagram.



Attachment B: Water Discharge System Process Flow Diagram