Pretreatment Permit Reissuance
Fact Sheet

Applicant	Truelove & Maclean, Inc.
Permit No.	SP0001326
Application No.	201614541
Date Application Received	November 14, 2016
Location Address	57 Callender Rd. Watertown, CT 06795
Facility Contact	Gavin Earl, Compliance Manager Office Phone: (860) 945-8333 Email: gavin.earl@truelovemaclean.com
Mailing Address	57 Callender Rd. Watertown, CT 06795
DMR Contact	Gavin Earl, Compliance Manager Office Phone: (860) 945-8333 Email: gavin.earl@truelovemaclean.com
Permit Term	5 Years
Permit Category	Pretreatment Significant Industrial User (SIU) Pretreatment Categorical Industrial User (CIU)
SIC Code	3469
NAICS Code	332439
Permit Type	Reissuance
Ownership	Private
Publicly Owned Treatment Works ("POTW") that Receives the Discharge	Discharge to the City of Waterbury Water Pollution Control Facility ("WPCF") via City of Watertown's collection system. NPDES Permit No. CT0100625. The WPCF discharges to the Naugatuck River.
DEEP Staff Engineer	Jim Creighton, Environmental Analyst Office Phone: 860-424-3681 Email: james.creighton@ct.gov
Date Application Public Noticed/ Name of Paper	November 10, 2016; Waterbury Republican American

Date Sufficiency Review Completed	May 11, 2017
Application Timely and Sufficient	☒ Yes ☐ No
Tentative Determination Fact Sheet Date	June 9, 2025

Section 1.0 Permit Fees

***Application Fee**:*

Filing Fee	Cost: $1,300.00	Date Paid: November 15, 2016
Processing Fee	Cost: $6,300.00	Date Paid: December 29, 2016

Annual Fee:

	Wastewater Category (per RCSA Section 22a-430-7)	**Flow Category**	**DSN**	**Annual Fee (per RCSA Sec. 22a-430-7 and CGS Sec. 22a-6f)**
	Metal Finishing (to POTWs)	>10,000 gpd	001-1	$8,425.00
TOTAL				$8,425.00

Section 2.0 Description of Waste Streams

The Applicant seeks authorization for the following:

DSN	**Proposed Average Daily Flow (gpd)**	**Proposed Maximum Daily Flow (gpd)**	**Proposed Waste Streams**	**Treatment Type**	**Discharge To**
001-1	16,400	19,400	Stamped metal parts cleaning (including JenFab Tank dumps), barrel rinsing, vibratory parts cleaning, conveyor cleaning, precipitator washing, floor washing, and floor spill collection wastewaters	Ultrafiltration and neutralization	City of Waterbury WPCF
002-1	2	50	Boiler blowdown	NA	City of Waterbury WPCF

Section 3.0 Facility Background & Permit History

Truelove and Maclean, Inc. ("Permittee") is a manufacturer that performs progressive metal stampings and drawn metal shells. The treatment system is used to treat wastewater from the cleaning and deburring of stamped metal parts. This wastewater is discharged to the Town of Watertown sanitary sewer collection system and then to the City of Waterbury WPCF by way of DSN 001-1 under this proposed renewal permit.

The Operation and Maintenance (O&M) Plan was last revised on January 16, 2025.

3.1 Solvent Management Plan

Is the facility operating under an approved solvent management plan (SMP)?
☐ Yes ☒ No ☐ N/A

3.2 Compliance & Enforcement

3.2.1 Reported Effluent Violations:

DSN 001-1

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
06/30/2014	Chromium, total	Mo Avg	0.50	1.83	mg/L
06/30/2014	Chromium, total	Daily Mx	1.00	1.83	mg/L
12/31/2014	Chromium, total	Mo Avg	0.50	0.868	mg/L
01/31/2015	Zinc, total	Mo Avg	0.47	0.602	mg/L
01/31/2015	Zinc, total	Daily Mx	0.72	0.927	mg/L
07/31/2015	Zinc, total	Mo Avg	0.47	1.20	mg/L
07/31/2015	Zinc, total	Daily Mx	0.72	1.20	mg/L
02/28/2017	Zinc, total	Mo Avg	0.47	0.801	mg/L
02/28/2017	Zinc, total	Daily Mx	0.72	0.801	mg/L
04/30/2017	Zinc, total	Mo Avg	0.47	1.88	mg/L
04/30/2017	Zinc, total	Daily Mx	0.72	3.17	mg/L
05/31/2017	Zinc, total	Mo Avg	0.47	0.573	mg/L
12/31/2018	Chromium, total	Mo Avg	0.50	0.522	mg/L
09/30/2019	Oil petroleum, total recoverable	Mo Avg	30.0	32.5	mg/L
04/30/2020	Zinc, total	Mo Avg	0.47	1.162	mg/L
04/30/2020	Zinc, total	Daily Mx	0.72	1.60	mg/L
06/30/2020	Zinc, total	Mo Avg	0.47	0.785	mg/L
06/30/2020	Zinc, total	Daily Mx	0.72	0.785	mg/L

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

Notice of Violation (NOV) WRIN24059 Issued: 12/17/2024 (Still 'Open')

NOVWRIN24059 was issued in response to a grab sample taken during the annual inspection on November 25, 2024, with a concentration of 0.5 mg/L for total toxic organics (TTO) and above the instantaneous permit limit of 0.25 mg/L. One volatile organic compound (VOC), p-chloro-m-cresol, was responsible for the exceedance. A second sample was taken within thirty (30) days following the issuance of NOVWRIN24059 with a concentration of p-chloro-m-cresol at 1.90 mg/L. The Permittee is searching for the source of the p-chloro-m-cresol. A compliance schedule has been added to the permit requiring the Permittee to achieve compliance with the TTO permit limit of 0.25 mg/L with a specific focus on reducing the p-chloro-m-cresol. This NOV will be closed out upon issuance of the permit renewal.

3.2.3 Have any enforcement actions been opened or closed in the prior permit term?

☒ Yes ☐ No

NNCWRIN23008 Issued: 4/11/2023 Closed: 4/11/2023
A Notice of Noncompliance ("NNC") was issued to the Permittee for failure to submit a Facility and Wastewater Treatment System Modification Request for Determination form ("3i form") for the replacement of their paddlewheel flow meter with a magnetic flow meter.

NOVWRIN20028 Issued: 10/13/2020 Closed: 11/30/2020
A NOV was issued to the Permittee for not submitting notifications to DEEP for exceedances of the monthly average and daily maximum limits for zinc during the months of April and June 2020. The Permittee responded that they had 1) slowed acid additions to their reaction tanks and increased holding times prior to processing wastewater through the ultrafiltration system, 2) increased target treatment pH in the treatment tanks to 9.7 S.U., and 3) contacted suppliers of coagulant and flocculent to check for formulation changes in order to improve zinc removal. The Permittee also noted that they had trained their staff in the proper notification procedures in the event of future exceedances of permit limits.

NOVWRIN12018 Issued: 8/17/2012 Closed: 9/26/2012
A NOV was issued to the Permittee for an exceedance of the maximum instantaneous limit for total chromium measured in a grab sample collected by DEEP staff during the 2012 compliance inspection. In their response, the Permittee noted other compliant total chromium results before and after this grab sample was taken. The Permittee also noted that treatment system operators had been instructed to 1) operate the wastewater treatment system at a slightly higher pH to precipitate the metals and 2) to not mix the chelate-breaking agent solution for an extended period of time which can reduce its effectiveness.

3.2.4 Does the Permit contain a compliance schedule? ☑ Yes ☐ No

If yes, please check all that apply.

☐ Pollution Prevention ☐ Water Conservation

☐ Remediation

☐ Water Quality Requirement ☐ Treatment Requirement

☑ Other

1) 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.

2) A compliance schedule has been added to the permit requiring the Permittee to achieve compliance with the TTO permit limit of 0.25 mg/L with a specific focus on reducing the concentration of the p-chloro-m-cresol. Once the compliance schedule has been met, the Permittee must submit a SMP for approval. Once the SMP has been approved, the permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved SMP. The language for the certification statement is contained in Section 5(H) of the permit.

3.3 Permit Modifications

Have there been any permit modifications during last permit term?

☑ Yes ☐ No

Facility or Process Modification 3(i)(3)

Application No. 201806141 Received: 4/24/2018 Approved: 8/7/2018
The Permittee requested and received authorization to replace the existing pH circular chart recorder with a Honeywell DR4500 circular chart recorder and to install Honeywell UDA2181 Universal Dual Analyzer units for pH monitoring in Storge Tank Nos. 1, 2, and 3, and the final pH adjustment tank in accordance with Section 22a-430-3(i)(3) of the Regulations of Connecticut State Agencies ("RCSA"). The change was implemented.

Wastewater Treatment System Modification 3(i)(3)
Application No. 201806142 Received: 4/24/2018 Approved: 8/7/2018
The Permittee requested and received authorization to begin using Aquapure ACM coagulant in Storage Tank Nos. 1, 2, and 3 in accordance with Section 22a-430-3(i)(3) of the RCSA. The change was implemented.

Wastewater Treatment System Modification 3(i)(3)
Application No. 202304211 Received: 5/11/2023 Approved: 6/7/2023
The Permittee requested and received authorization to replace the Koch-Abcor Ultrafiltration unit and a paddlewheel flowmeter with a Konsolidator 160 Ultrafiltration unit and a magnetic flowmeter in accordance with Section 22a-430-3(i)(3) of the RCSA. The change was implemented.

3.4 Other Water Discharge Permits

General Permit for the Discharge of Stormwater Associated with Industrial Activity - (Permit No. GSI001967)

Section 4.0 The On-site Wastewater Treatment System

The treatment system is used to treat wastewater from the cleaning and vibratory deburring of metal parts. Jensen parts washing machines clean the metal parts using aqueous cleaners to remove coolants, oils, and drawing compounds. Vibratory deburring activities use aqueous cleaners and vibratory finishing media in vibratory bowls to remove burrs and sharp edges from the parts. These wastewaters are collected in a sump which is pumped to Wastewater Collection Tank Nos. 2, 3, or 4.

The system also treats wastewater from the cleaning of shop floors by a mop truck, barrel rinsing, and precipitator washing. The wastewater from these activities flows to Wastewater Collection Tank #1.

The wastewater from the collection tanks is directed to three (3) 5,500-gallon wastewater storage tanks. Each storage tank contains a high-level alarm, a low-level alarm, and valves which control the flow of wastewater between each tank and the treatment system. A 5,500-gallon concentrate tank is used to collect free oils from the Oil Skimming Tank, the supernatant from the wastewater storage tanks, the presses, and the ultrafiltration membrane. These oils are pumped from this tank by a licensed waste hauler on a regular basis.

Wastewater is directed from one (1) of the three (3) wastewater storage tanks to a 1,500-gallon feed tank at the start of the wastewater treatment system. This tank is used to supply wastewater to the ultrafiltration system and receives recirculated wastewater from the treatment system that does not penetrate the ultrafiltration membranes.

A 240-gallon Permeate Tank collects the permeate that has passed through the ultrafiltration membranes. Wastewater from the Permeate Tank flows to a 340-gallon pH Adjust Tank, the last tank in the system. In this tank, a Honeywell pH controller adjusts the pH of the wastewater using sodium hydroxide or sulfuric acid to a level within the acceptable range specified by the discharge permit.

See **Attachment A** for the process flow diagram which also includes the components of the Wastewater Treatment System.

Section 5.0 Effluent Limitations and Monitoring Requirements

5.1 Basis for Permit Limits and Conditions

The Truelove & Maclean, Inc. site contains a small, self-contained electroplating process that has no wastewater discharge. However, the site also has a wastewater discharge from the cleaning of metal parts. The combination of these two processes subjects the site to the metal finishing requirements of 40 CFR 433.

Truelove & Maclean, Inc. initiated this discharge in 1989, 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.

Basis for Limits, Standards, and Conditions		Discharge Point(s)
☒	Federal Effluent Limitation Guideline ("ELG") – 40 CFR 403	DSN: 001-1
☐	Pretreatment Standards for Existing Sources ("PSES")	
☒	Pretreatment Standards for New Sources ("PSNS") 40 CFR 433.177	DSN: 001-1
☒	Sections 22a-430-3 and 22a-430-4 of the Regulations of Connecticut State Agencies ("RCSA")	DSN: 001-1
☒	Case-by-Case Determination using Best Professional Judgment ("BPJ") RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	DSN: 001-1
☒	Anti-Backsliding – RCSA Section 22a-430-4(l)(4)(D)(vi)	DSN: 001-1
☒	Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works", USEPA, 1975-628-875	DSN: 001-1

5.2 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 both the approval and control authority, pursuant to 40 CFR 403.10(e). This authorization was granted through 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.

Pursuant to 40 CFR 403.5(c)(2), POTWs are required to develop and enforce specific effluent limits for industrial users (IUs) to prevent pass through and interference, thereby ensuring the POTW's compliance with its NPDES permit and sludge management practices. Under the MOA with EPA, the State must ensure that the development of such limits for discharges of prohibited pollutants under 40 CFR 403.5(c) is as comprehensive as would be required under a locally administered program. Accordingly, DEEP incorporates only technically-based local limits developed in accordance with 40 CFR 122.44(j)(2)(ii) and EPA's *Local Limits Development Guidance* (EPA 833-R-04-002A,

July 2004) into state-issued permits. Local limits not included in state permits remain enforceable by the municipality through its sewer use ordinance.

5.3 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.

5.4 Applicable Effluent Limits Comparison

The following table compares required federal limits, state limits, and limits developed utilizing best professional judgement for each DSN. The most stringent of the applicable limits are applied for each parameter.

DSN 001-1

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
Aluminum, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	---	NA
Cadmium, Total	mg/L	0.07	0.11	NA	0.07	0.11	0.75	**0.035**	**0.055**	**0.083**
Chromium, Total	mg/L	1.71	2.77	NA	1.0	2.0	3.0	**0.5**	**1.0**	**1.5**
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	**1.20**
Flow, Maximum during 24 hr. period	gpd	NA	NA	NA	NA	NA	NA	NA	**19,400**	NA
Iron, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	---	NA
Lead, Total	mg/L	0.43	0.69	NA	**0.1**	**0.5**	0.75	NA	NA	**0.5**
Magnesium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	----	NA
Nickel, Total	mg/L	2.38	3.98	NA	1.0	2.0	3.0	**0.63**	**0.85**	**1.28**
Oil & Grease, Non-polar Material	mg/L	NA	NA	NA	NA	NA	NA	**30.0**	**50.0**	**75.0**
pH	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	**6.0-10.0**
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	**0.25**	**0.37**
Total Suspended Solids (“TSS”)	mg/L	NA	NA	NA	NA	NA	NA	NA	-----	NA
Total Toxic Organics (“TTOs”)	mg/L	NA	2.13	NA	NA	NA	NA	NA	NA	**0.25**
Zinc, Total	mg/L	1.48	2.61	NA	1.0	2.0	3.0	**0.47**	**0.72**	**1.08**

If “----" is noted in the limit’s column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”). If “NA” is noted, this means there is no limit or monitoring required.

5.5 Monitoring Requirements

Monitoring frequencies for parameters are generally established in accordance with the Monitoring Schedule outlined in RCSA Section 22a-430-3(j)(2), which considers both the discharge category and the volume of the discharge. However, alternative monitoring frequencies may be determined using BPJ, taking into account factors such as waste stream and process variability, the nature and concentration of pollutants discharged, applicable effluent limits, discharge frequency, and information regarding the POTW. For parameters required by regulation but determined—based on applicant-provided information—not to be present in the discharge, a minimum sampling frequency of semi-annually is applied, pursuant to 40 CFR 403.12(e)(1).

Sample collection methods are selected based on the variability of the discharge and specific parameter being monitored, in accordance with RCSA Section 22a-430-3(j)(7).

The following tables detail the sample types, sampling frequencies, and the rationale for monitoring associated with each DSN.

DSN 001-1

Sample Type	Sample Frequency	Parameter	Monitoring Rationale
Daily Composite Sample	Monthly	Aluminum, Total	Present in effluent during last permit term. Expected source is stamping and cleaning of aluminum parts.
		Chromium, Total	Present in effluent during last permit term. Expected source is stamping and cleaning of chrome-plated parts.
		Copper, Total	Present in effluent during last permit term. Expected source is stamping and cleaning of copper parts.
		Iron, Total	Present in effluent during last permit term. Expected source is stamping and cleaning of steel parts.
		Magnesium, Total	Present in effluent during last permit term. Expected source is stamping and cleaning of aluminum parts.
		Nickel, Total	Present in effluent during last permit term. Expected source is stamping and cleaning of nickel-plated parts.
		Zinc, Total	Present in effluent during last permit term. Zinc is present most months. Expected source is stamping and cleaning of galvanized steel parts.
		TSS	Present in effluent during last permit term. Expected source is dust and dirt from source material and stamped parts.
	Semi-annually	Cadmium, Total	Monitoring required by 40 CFR 433.
		Lead, Total	Monitoring required by 40 CFR 433.
		Phosphorus, Total	Present in effluent during last permit term. Expected source is the Kochkleen UCA used in cleaning the ultrafiltration membranes.

Sample Type	Sample Frequency	Parameter	Monitoring Rationale
		Silver, Total	Monitoring required by 40 CFR 433.
Grab Sample Average	Monthly	Oil & Grease, Non-polar Material	Present in effluent during last permit term. Source is lubricating oils from metal stamping process.
	Semi-annually	Cyanide, Total	Monitoring required by 40 CFR 433.
Grab Sample	Monthly	TTO	Monitoring waiver allowed for TTOs once compliance schedule has been met and SMP is resubmitted and approved.

5.6 Permit Limits and Monitoring Requirements Development

DSN 001-1

Aluminum, Total: There are no categorical effluent limits for aluminum in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Therefore, only monitoring will be required.

Cadmium, Total: The average monthly limit ("AML") of 0.035 mg/L, maximum daily limit ("MDL") of 0.055 mg/L, and maximum instantaneous limit ("MIL") of 0.083 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi).

Chromium, Total: The AML of 0.5 mg/L, MDL of 1.0 mg/L, and MIL of 1.5 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi).

Copper, Total: The AML of 0.54 mg/L, MDL of 0.73 mg/L, and MIL of 1.09 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi).

Cyanide, Total: The AML of 0.65 mg/L has been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi). The MDL and MIL of 1.2 mg/L were revised to 1.20 mg/L to conform with the significant figure requirements established in 40 CFR 433.

Iron, Total: There are no categorical effluent limits for iron in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Therefore, only monitoring will be required.

Lead, Total: The AML of 0.1 mg/L and MDL of 0.5 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi). The effluent limit for the MIL was modified to 0.5 mg/L to align with the MDL in accordance with Water Permitting and Enforcement Division's practice when a pollutant concentration is not anticipated to have variability. During the last permit term, the MIL was 0.75 mg/L.

Magnesium, Total: There are no categorical effluent limits for magnesium in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Therefore, only monitoring will be required.

Nickel, Total: The AML of 0.63 mg/L, MDL of 0.85 mg/L, and MIL of 1.28 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi).

Oil and Grease, Non-polar Material: The AML of 30.0 mg/L, MDL of 50.0 mg/L, and MIL of 75.0 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi).

pH: The pH range of 6.0 – 10.0 standard units was carried forward from the previous permit.

Phosphorus, Total: There are no categorical effluent limits for phosphorus in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Therefore, only monitoring will be required.

Silver, Total: The AML of 0.10 mg/L and MDL of 0.25 mg/L, have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi). The MIL of 0.375 mg/L was modified to 0.37 mg/L to conform to significant figure requirements.

Total Suspended Solids (TSS): There are no categorical effluent limits for TSS in 40 CFR 433.17 or RCSA Section 22a-430-4(s). Therefore, only monitoring will be required.

Total Toxic Organics: The MIL of 0.25 mg/L has been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi). The permit includes a compliance schedule for TTOs with a focus on p-chloro-m-cresol. A Solvent Management Plan can be submitted for approval once the Permittee has met the compliance schedule.

Zinc, Total: The AML of 0.47 mg/L, MDL of 0.72 mg/L, and MIL of 1.08 mg/L have been carried forward from the previous permit in accordance with the anti-backsliding regulation, RCSA Section 22a-430-4(l)(4)(D)(vi).

DSN 002-1

Boiler blowdown discharge is not expected to adversely impact the POTW due to its low flow rate and characteristics of the discharge. Therefore, monitoring requirements will not be imposed.

5.7 Summary of Changes Made to New Permit

The following changes have been made to this iteration of the permit:

- The frequency of monitoring for chromium was changed from semi-annually to monthly.
- The frequency of monitoring for TTO was changed from semi-annually to monthly. The Permittee can submit a Solvent Management Plan for approval once the compliance schedule for TTOs is met.

- The addition of a compliance schedule for 1) PFAS screening and 2) a return to compliance with the TTO limit, specifically p-chloro-m-cresol
- The MIL for lead was updated from 0.75 mg/L to 0.5 mg/L.
- Table B was added for the discharge of a maximum of fifty gallons per day of boiler blowdown.

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(D) of this permit.

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

All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR.

NetDMR is accessed from: http://www.epa.gov/netdmr.

Section 7.0 Public Participation for 30 Day Notice

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. 201614541 PERMIT ID NO. SP0001326

Interested persons may obtain copies of the application from:
Gavin Earl
Truelove & Maclean, Inc.
57 Callender Road
Watertown, CT 06795
860-945-8333

The application is available for inspection by contacting Jim Creighton at 860-424-3681 and james.creighton@ct.gov at the Water Permitting and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, from 8:30 - 4:30, Monday through Friday.

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.

7.1 Public Comment

Prior to making a final determination to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within thirty (30) days of this public notice. Written comments should be directed to Jim Creighton, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127 or DEEP.Pretreatment@ct.gov. 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 (25) persons. Notice of any public hearing shall be published at least thirty (30) days prior to the hearing.

7.2 Petitions for Hearing

Petitions for a hearing shall be submitted within thirty (30) days from the date of publication of this public notice and should include the application number noted above and also identify a contact person to receive notifications. Petitions should also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. The Office of Adjudications will accept electronically-filed petitions for hearing in addition to those submitted by mail or hand-delivered. Petitions with required signatures may be sent to deep.adjudications@ct.gov; those mailed or delivered should go to the DEEP Office of Adjudications, 79 Elm Street, Hartford, CT 06106. If the signed original petition is only in an electronic format, the petition must be submitted with a statement signed by the petitioner that the petition exists only in that form. Original petitions that were filed electronically must also be mailed or delivered to the Office of Adjudications within 30 days of electronic submittal. Additional information can be found at 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.

Attachment A