



General Pretreatment Permit for Non-Significant Industrial User Discharges to Publicly Owned Treatment Works

Permit No. CTPNONSIU

Fact Sheet

This fact sheet sets forth the significant factual, legal, and policy considerations examined during preparation of this draft general permit. This action has been prepared in accordance with the Connecticut State Statutes and its implementing regulations, the Regulations of Connecticut State Agencies. Issuance of a general permit serves to simplify and streamline the National Pollutant Discharge Elimination System (“NPDES”) and Pretreatment Program permitting process for similar types of discharges; in lieu of each facility having to obtain an individual permit. This general permit provides permit conditions and limitations to protect waters of the State from pollution.

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2025 Reissuance Fact Sheet

1.0 General Permit History & Authority

1.1 Authority

In 1965 the Connecticut Clean Water Task Force was commissioned to investigate the condition of rivers and harbors in Connecticut. The Connecticut Clean Water Task Force developed an action program called Clean Water for Connecticut in 1966. On May 1, 1967, Connecticut's Clean Water Bill was signed into law, inaugurating the state's modern water pollution control program. The Connecticut Water Quality Standards were then approved by the federal government in 1970. A year later the Department of Environmental Protection was created, and Congress began drafting the federal legislation for the first national Clean Water Act using Connecticut's Clean Water Act as a guide.

Congress passed the Federal Water Pollution Control Act of 1972 ("Clean Water Act" or "CWA") on October 18, 1972, 33 U.S.C. 1251 et seq., with the objective to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 101(a), 33 U.S.C. 1251(a). To help achieve this objective, the CWA provides that "the discharge of any pollutant by any person shall be unlawful" except in compliance with other provisions of the statute, CWA Section 301(a), 33 U.S.C. 1311(a). The CWA National Pollutant Discharge Elimination System ("NPDES") Permit Program represents one of the key components established to accomplish the goals of the CWA. The NPDES Permit Program generally requires that point source discharges of pollutants to waters of the United States, i.e., direct dischargers, obtain an NPDES permit. In addition to addressing the direct discharges, the CWA also established a program to address indirect discharges from industries to publicly owned treatment works ("POTW"). The National Pretreatment Program was established by Congress under authority of the Federal Water Pollution Control Act of 1972 as amended by the Clean Water Act of 1977. Implementation requirements of the pretreatment portions of these laws were first codified into 40 Code of Federal Regulations ("CFR") Part 403 in 1978. The National Pretreatment Program is a component of the NPDES program.

Pursuant to the CWA and Title 22a-430 of the Connecticut General Statutes ("Conn. Gen. Stat."), any person who initiates or creates a discharge of pollutants to the waters of the state must first obtain a permit authorizing the discharge. The Connecticut Department of Energy and Environmental Protection ("DEEP") is a delegated authority from the United States Environmental Protection Agency ("EPA") to implement the federal NPDES Program. In accordance with this delegation, DEEP has been provided the authority to promulgate regulations, and issue permits in accordance with the Conn. Gen. Stat. and the Regulations of Connecticut State Agencies ("Regs. Conn. State Agencies"). DEEP is authorized to administer a Pretreatment Program pursuant to 40 CFR Part 403 in accordance with Section 22a-430 of Chapter 446k of the Conn. Gen. Stat. and the Regs. Conn. State Agencies adopted thereunder, as amended, and a modified Memorandum of Agreement ("MOA") dated June 3, 1981, by the EPA Administrator.

The National Pretreatment Program is designed to:

- Protect POTW infrastructure.
- Reduce conventional and toxic pollutant levels discharged by industries and other nondomestic wastewater sources into municipal sewer systems and into the environment.

The term "pretreatment" refers to the requirement that non-domestic sources or indirect users discharging wastewater to POTWs control their discharges, and meet limits established by EPA, and the State of Connecticut ("Control Authority") on the amount of pollutants allowed to be discharged. The National Pretreatment Program is charged with controlling conventional, nonconventional, and toxic pollutants from indirect users that discharge into sewer systems, as described in the CWA Section 307(a) and this charge is met with the implementation of the following program objectives:

- Protect POTWs from pollutants that may cause interference with sewage treatment plant operations.
- Prevent the introduction of pollutants to a POTW that could cause pass through of untreated pollutants to receiving waters.
- Manage pollutant discharges into a POTW to improve opportunities for reuse of POTW wastewater and residuals (sewage sludge).
- Prevent the introduction of a pollutant that could cause worker health or safety concerns, or that could pose a potential endangerment to the public or to the environment.

The control of the pollutants may necessitate treatment prior to discharge to the POTW (therefore the term "pretreatment"). Pretreatment standards and requirements can be expressed as numeric limits, narrative prohibitions, and best management practices ("BMPs"). Permit limits may often be met by pollution prevention techniques (product substitution, recycle and reuse of materials, more efficient production practices, improved environmental management systems, etc.), pretreatment of wastewater, or implementation of best management practices.

Industrial Users (or indirect dischargers) are generally grouped into one of three (3) primary categories: (1) Industrial User/Indirect User, (2) Significant Industrial User ("SIU"), and/or (3) Categorical Industrial User ("CIU"). The industrial category determines the applicable pretreatment standards, prohibitions, and permit terms. An Industrial User may be a SIU and also a CIU based on its specific industrial activity and pollutants discharged to the POTW.

A Significant Industrial User ("SIU") means:

- 1) all Industrial Users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and
- 2) any other Industrial User that: discharges an average of 25,000 gallons per day or more of process wastewater to a Publicly Owned Treatment Works ("POTW") (excluding sanitary, noncontact cooling and boiler blowdown wastewater); or
- 3) contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant; or

4) is designated as such by the Commissioner on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

A "Categorical Industrial User" means an Industrial User subject to Categorical Pretreatment Standards under 40 CFR Part 405-471.

1.2 Permit History

On September 29, 2020, DEEP issued the General Permit for Discharges from Miscellaneous Industrial Users ("2020 MIU GP") which permitted the discharges previously covered under the General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater ("MISC General Permit"). The MISC General Permit covered discharges of Process and Non-process Wastewater from facilities not subject to Categorical Pretreatment Standards. The MISC General Permit expired on October 30, 2020, and facilities that had permit coverage under that permit were required to apply for coverage under either the 2020 MIU GP, the General Permit for Discharges from Significant Industrial Users ("SIU GP"), or an individual pretreatment permit.

The name of the permit has been updated to the *General Pretreatment Permit for Non-Significant Industrial User Discharges to Publicly Owned Treatment Works* ("Non-SIU GP" or "general permit").

1.3 Public Participation

As part of the technical review and drafting of this general permit, DEEP solicited feedback from the regulated community. On January 16, 2024, DEEP hosted a listening session to solicit comments on the existing permit and suggestions to improve the permitting process. On December 4, 2024, DEEP shared and solicited feedback on the proposed pre-draft general permit shared with the community thirty (30) days in advance of the meeting.

2.0 Authorization Under This General Permit

2.1 Eligible Discharges

Activities eligible for authorization under this general permit are restricted to the discharges from Non-Significant Industrial Users ("Non-SIU"), that are not classified as a Significant Industrial User ("SIU") as defined in 40 CFR 403.3(v), to a Publicly Owned Treatment Works ("POTW") via the sanitary sewer or via transport by a licensed waste transporter, that meet the requirements and conditions contained in the permit.

To meet the requirements for authorization, the Industrial User ("IU") must:

- Not be subject to any provision of 40 CFR 403.6 (National Pretreatment Standards: Categorical Standards) and 40 CFR Chapter I, Subchapter N for which a regulation containing pollutant discharge limits has been promulgated.

- Have an average daily flow of less than 25,000 gpd from process discharges.
- Have a maximum cumulative process discharge that contributes less than five percent (5%) of the average dry weather hydraulic or organic capacity of the POTW.
- Not otherwise be designated as a SIU by the Commissioner on the basis that the discharge has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standards or requirements in accordance with 40 CFR 403.8(f)(6).
- Be in compliance with all terms and conditions of this general permit including, but not limited to, the prohibitions described in Section 2.2.4 of this general permit.

2.2 Categories of Wastewater

Types of wastewater covered under this general permit include Non-SIU Wastewaters, which can be further broken down into Process Wastewater and Non-process Wastewater, and are defined below.

2.2.1 Non-Significant Industrial User (Non-SIU) Wastewater

Wastewater discharged to a POTW from an Industrial User that is not a SIU, including the following categories of wastewater: air compressor condensate and blowdown, boiler blowdown, commercial laundry wastewater, contact cooling and heating wastewater, cutting and grinding wastewater, fire suppression system testing wastewater, food processing wastewater, hydrostatic pressure testing wastewater, non-contact cooling water, non-destruct testing rinsewater, photographic processing wastewater, printing wastewater, process building maintenance wastewater, potable water system maintenance or sampling wastewaters, swimming pool wastewater, tumbling or cleaning of parts wastewater, water treatment wastewater, vehicle maintenance wastewater, and "other" process and non-process wastewaters not listed above. Domestic sewage including septage or sewage from portable sources are excluded from this definition.

2.2.2 Process Wastewater

Any water, not subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N which, during manufacturing or processing, comes into direct contact with, or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.

2.2.3 Non-process Wastewater

Any Non-SIU wastewater which is not a Process Wastewater.

3.0 Notification and Permit Requirements

In the reissuance of the Non-SIU GP, the notification requirements have been updated to require that all dischargers must submit a Notification Form to both the applicable POTW Authority(ies) and DEEP. This change enables DEEP to better assess the flow and pollutant characteristics of discharges to POTWs, providing the foundation for establishing technically based local limits in the future.

3.1 Registration/Notification Requirements and Updates

- The Notification Form shall be submitted with the associated POTW Authority(ies) and DEEP on forms prescribed and provided by the Commissioner. Notification requirements are summarized in Section 3 of the general permit and require the submission of an online form to DEEP. That form can also be provided to the POTW Authorities, in addition to their local requirements.
- The Notification Form has been updated to increase data collection efficacy and to allow for more consistent and complete data collection across the regulated universe. Additionally, a screening requirement was added. This requirement specifies that IUs that may have emerging contaminants reasonably known to be present in the discharge must screen for such pollutants.
- The screening analysis has been updated to be required for all Process and Non-process Wastewater discharges.
- PFAS monitoring requirements have been included for facilities in specific industry categories and or those with known or suspected concentrations of PFAS in their effluent.
- The POTW Authority may require an Applicant to submit additional information, which the POTW Authority reasonably deems necessary to evaluate the consistency of the subject activity with the requirements for authorization under this general permit.

3.2 Interim Coverage for Existing Permittees

Facilities with existing permit coverage as of October 30, 2025, under the 2020 MIU GP, are eligible for continued permit coverage under this general permit on an interim basis provided the Permittee has filed a Notification Form with the POTW Authority and the Commissioner on or before ninety (90) days from the effective date of this general permit and the Permittee is in compliance with the conditions of the permit and the POTW Authority's requirements. Variances granted during the 2020 issuance of the 2020 MIU GP will continue in effect during the transition period, while the existing permittee is awaiting a final determination from the POTW Authority regarding their timely submitted Notification Form. Once the POTW makes a determination on the variance under the 2025 issuance of the Non-SIU GP, variances granted during the 2020 MIU GP are no longer in effect.

3.3 New Discharges

For new discharges eligible for coverage under this general permit, the effective date of authorization to discharge under this general permit is the date that the required Notification Form has been submitted to each applicable POTW Authority and DEEP, and all POTW Authority requirements have been satisfied.

3.4 Modification of an Existing Discharge Authorization

A Notice of Change form shall be submitted for the following scenarios:

- Ownership change
- To correct inaccurate or misleading information previously submitted to DEEP
- The change in nature of the activity generating the discharge, including a change in pollutant loading of an existing pollutant.

- The introduction of a new source of water.
- The introduction of a new pollutant that was not present in the discharge at the time of Notification Form submittal.
- A change in the maximum daily flow.
- A relocation of the monitoring location.
- An expansion or alteration of the wastewater treatment system.
- To request a variance
- Submittal of screening results for New Applicants

Contents of a Notice of Change are described in Section 3 of the general permit.

4.0 Proposed Changes for All Permittees

The proposed general permit contains substantial changes that are summarized below:

4.1 Standardized Language

The format and language of the proposed general permit have been updated to be consistent with DEEP and division formats. This change is primarily cosmetic and does not affect the conditions of the permit.

4.2 SIU Definition Update

The draft permit proposes an update to the definition of SIU to align with the definition found in 40 CFR 403.3(v). This update will narrow the scope of facilities considered SIUs and increase the facilities eligible under the Non-SIU GP. In the 2020 MIU GP issuance, facilities are considered a SIU if the maximum daily flow of process wastewater is 25,000 gpd or more. In the reissuance, the definition is updated to use an average daily flow of 25,000 gallons per day or more as the flow criterium.

4.3 Minimum Levels

Minimum level requirements have been added in the reissuance of the general permit to ensure analytical methods are able to effectively evaluate compliance with effluent limits in the permit and analytical results are consistent across DEEP. Minimum levels represent the concentrations at which quantification is achieved and verified during the chemical analyses.

4.4 Effluent Limits and Prohibitions

4.4.1 Mercury

The effluent limit for mercury was updated and the analytical method has been prescribed.

4.4.2 Per- and polyfluoroalkyl substances (PFAS)

PFAS monitoring requirements have been included for facilities in specific Industry Categories, those with known or suspected concentrations of PFAS in their discharge, or as determined by the

Commissioner. Permittees shall create a PFAS Identification and Minimization Plan to identify sources, review chemical substitutions, treatment, and operational changes to minimize the amount of PFAS discharged to the POTW.

4.4.3 pH

The pH limits were narrowed from 5.0 – 12.0 S.U. to 5.5 – 10.0 S.U. to protect all of the POTWs' assets and infrastructure. The general permit includes a two (2) year compliance schedule for Existing Permittees to comply with the new effluent limits.

4.4.4 Temperature

A temperature limit of 140 °F was added to protect all of the POTWs assets and infrastructure.

4.4.5 Polychlorinated Biphenyls (PCBs)

A prohibition on discharging PCBs beyond permit limits was added to the permit.

5.0 General Permit Conditions, Prohibitions, and Limits

5.1 Permit Conditions and Prohibitions

5.1.1 Discharges shall not cause:

- Interference or adverse effect upon the operation of the POTW.
- Interference or adverse effect upon the POTW's sludge handling, use or disposal, including but not limited to noncompliance with any federal, state, local laws, regulations or ordinances.
- The POTW to exceed its influent design loading parameters.
- The POTW to violate its permit, including but not limited to exceeding its permit limits.
- A worsening of any condition which is causing the POTW to exceed its influent design loading parameters or violate its permit.
- Pass through of any substance into the receiving waters which then causes or threatens pollution.

5.1.2 The discharges shall not:

- Contain any pollutant, including oxygen demanding pollutants released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW.
- Contain any substance which causes or threatens a fire or explosion hazard in each applicable POTW, including but not limited to, wastewaters with a closed cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 CFR 261.21.
- Cause or threaten corrosive structural damage to each applicable POTW and shall not have a pH outside of the effluent limits in the general permit.
- Contain solid or viscous pollutants in amounts which will cause or threaten obstruction of flow in the sanitary sewer system or each applicable POTW.

- Contain heat in amounts which will inhibit biological activity within each applicable POTW.
- Contain heat in such quantities that the influent temperature at the POTW exceeds 104°F (40°C).
- Contain heat in such quantity that the effluent from the site is greater than 140°F (60°C).
- Contain petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through.
- Contain pollutants which result in the presence of toxic gases, vapors or fumes within each applicable POTW in a quantity that may cause acute worker health or safety problems.
- Contain pollutants in a quantity or concentration which may cause or contribute to excessive foaming within each applicable POTW, or which may cause foaming within the POTW's effluent.
- Contain either singly or in combination with other discharges any pollutant in sufficient amounts to cause acute worker health and safety problems, problems in the collection system or pass through or interference with each applicable POTW.
- Contain either singly or in combination with other discharges flow in excess of the hydraulic capacity of each applicable POTW or its conveyance system.
- Contain mercury compounds beyond permit limits.
- Contain polychlorinated biphenyl ("PCB") compounds beyond permit limits.
- Contain any substance listed in Appendix E of this general permit, other than a substance for which an effluent limit is specified in this general permit or as otherwise approved by the POTW Authority.
- Contain boil-out and boiler acid cleaning wastewaters.
- If trucked or hauled, be introduced into a POTW except at headworks of the POTW.

5.1.3 Dilution is expressly prohibited as a form of treatment.

5.1.4 Permittees are not authorized to collect and transport wastewater for discharge to a POTW under this general permit unless the following conditions have been met:

- The POTW Authority is on the list in Appendix D as approved to accept transported non-domestic wastewater.
- The POTW Authority has authorized the acceptance of such wastewater.
- The Permittee's facility is not connected to a sanitary sewer or the Permittee's facility is connected to a sanitary sewer and the discharge has been rejected in writing by the local POTW Authority.
- The Permittee has installed appropriate facilities to store such wastewater in accordance with Appendix B of this general permit.
- The Permittee transports the wastewater by a properly licensed waste transporter.

- Such wastewater transported to a POTW complies with the effluent limits and conditions of this general permit.
- Written certification has been provided to the receiving POTW Authority that such wastewater is not a Hazardous Waste as defined in 40 CFR 261, Subparts C and D.
- A log of each instance of wastewater transported has been maintained including dates, volumes, a description of the wastewater, persons transporting (name and contact information), and all monitoring results.

5.2 Monitoring Requirements

Sampling to demonstrate compliance with the permit conditions shall utilize the sample types in the general permit.

All facilities must record both average monthly flow and maximum daily flow, except for batch treatment systems with a known discharge volume and discharges which occur less than once per week, by means of a flow meter system and associated recording device. Process Wastewater discharges with a maximum daily flow less than 5,000 gpd or Non-process Wastewater discharges (all flows) can use estimates of flow. Estimates of flow shall be based on information from a dedicated incoming water meter, a batch treatment tank volume, the accurately timed filling of a container of known volume, a rated pump capacity, or other generally acceptable engineering practice. Flow requirements have been extended to all IUs to aid in the collection of flow data for discharges to POTWs.

5.3 Record Keeping and Reporting

Permittees are responsible for retaining copies of all records required under this general permit for a minimum period of five (5) years after the date of termination of the permit or after the permit expires.

5.4 Reporting a Violation

Requirements for reporting a violation have been updated to align with the regulatory requirements in the Regs. Conn. State Agencies Section 22a-430-3(j), utilizing the Commissioner's online Noncompliance Notification and Noncompliance Follow-up Report Forms, available here: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements> The Permittee shall submit a noncompliance notification to the Commissioner and the POTW Authority.

5.5 Analytical Methods

All sample analysis required under this general permit, with the exception of analyses of pH, temperature, and total residual chlorine, shall be conducted by a laboratory certified in accordance with the certification requirements specified in the Conn. Gen. Stat. All samples shall be analyzed using test methods pursuant to 40 CFR 136 unless an alternative method has been approved in writing by the Commissioner pursuant to 40 CFR 136.4 or as provided in Section 22a-430-3(j)(7) of the Regs. Conn. State Agencies. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified by the Commissioner.

5.6 Conditions Applicable to Process and Non-process Discharges

Process and Non-process Wastewater discharges under the authority of this general permit shall not exceed and shall otherwise conform to the specific terms and conditions listed in Section 4 -Effluent Limits for Group I and Group II Discharges, of the general permit. Limits for discharges of Process and Non-process Wastewater have not changed significantly from the 2020 MIU GP. Effluent limits continue to be protective of the waters of the state in accordance with anti-backsliding regulations, the Regs. Conn. State Agencies Section 22a-430-4(1)(4)(D)(vi) and 40 CFR 122.44(l)(1) and were therefore carried forward from the previous permits.

5.6.1 Summary of Changes from the 2020 MIU GP

- A limit of 3.0 mg/L was added for total residual chlorine. Monitoring of total residual chlorine is required for potable water system maintenance or sampling wastewater and swimming pool wastewater.
- The limits for TKN and nitrate-nitrite (as N) were removed and replaced with a total nitrogen limit of 40 mg/L. The previous effluent limits for TKN and nitrate-nitrite (as N) were both set at 40 mg/L. Since these parameters contribute to total nitrogen, the new, more stringent total nitrogen limit now consolidates these limits into a single, lower threshold, ensuring more effective protection of water quality.
- POTW-specific effluent limits were reviewed and removed based on the technical review conducted for the reissuance of this general permit. The effluent limits in Section 4 provide adequate protection for sanitary sewer systems and municipal treatment plants.
- The parameters listed in the minimum monitoring requirements table of the general permit, were updated with additional pollutants of concern associated with each wastewater category. The following pollutants were added to the table: total nitrogen, ammonia, PFAS, total residual chlorine, and any other pollutant listed in Appendix E or G expected in the discharge.
- Monitoring requirements have been included for discharges that were not previously required to be monitored under the 2020 MIU GP.

6.0 State Regulations of Connecticut State Agencies

The permittee shall comply with the Regs. Conn. State Agencies Sections 22a-430-3 and 22a-430-4 which are hereby incorporated into this general permit, as is fully set forth herein.

7.0 Federal Regulations

The Permittee shall comply with the applicable federal regulations, 40 CFR Parts 122, 123, 127, 136, and 403, which are hereby incorporated into this general permit, as is fully set forth herein.

8.0 Summary of Significant Changes Following Public Comment Period

Summary of changes from the draft permit and fact sheet posted April 28, 2025, made in response to comments received.

8.1 Changes to the Permit

- Grammatical and spelling errors corrected throughout the permit.
- Sections were relocated to align with Agency wide standards.
- Internal permit references have been updated.
- Updated the application submittal process.
- Minor language changes not affecting permit conditions made throughout the permit for clarity and ease of reading; language changes potentially affecting permit conditions listed separately.
- Dewatering and Remediation Wastewater, Temporary & Short-term Discharges, and Emergency Discharges have been removed. Conditions and requirements for these discharges (formerly Section 6). These discharges are now covered solely under the SIU GP to ensure consistent review and oversight.
- Conditions and requirements for Group I and Group II discharges (formerly Section 5) have been relocated to Section 4.
- Section 2.1: Clarification that residuals generated by water treatment facilities are not authorized by this general permit.
- Section 2.2.4: Addition of conditions for the collection and transport of wastewater as Section 2.2.4.4 (formerly Section 4.13)
- Section 2.5.1: Clarification that variances approved during the permit term of the 2020 issuance of the MIU GP remain in effect until the POTW makes a determination on the timely submission of the Notification Form submitted under the 2025 Non-SIU GP.
- Section 2.5.1: Replacement of '*Discharge Notification Form for the General Permit for Non-Significant Industrial Users for Discharges to Publicly Owned Treatment Works*' with 'Notification Form.'
- Section 2.6.3: Addition of requirements for the transition of an industrial user from the 2020 issuance of the SIU GP to the 2025 issuance of the Non-SIU GP.
- Section 3.5: Addition of requirement for submitting a Notice of Change – to submit screening results for a New Applicant. Requirements for discharge or activity modifications (formerly Section 4.11) and treatment system modifications (formerly Section 4.12) have been relocated to this section.
- Section 3.5 (formerly Section 3.4): Change in condition requiring a Notice of Change to be submitted from 'ownership change' to 'name change'. The permit is not transferrable.
- Section 3.4 (formerly Section 3.5): Table 3-1: Notification Requirements has been removed from the permit.
- Section 3.4.1 (formerly Section 3.5.1): Removal of requirement to submit a copy of the prior permit or Approval of Registration with the Notification Form if the Applicant was previously authorized under a permit issued by DEEP.

- Section 3.4.2 (formerly Section 3.5.2): Clarification to Process and Non-process Discharge Analysis required on the Notification Form. Analysis requirements were further clarified for New Applicants and Existing Permittees.
- Section 3.4.2 (formerly Section 3.5.2): Replacement of Vehicle Maintenance Wastewater with Commercial Carwash Wastewater for types of wastewater requiring PFAS screening.
- Section 3.4.2, Table 3-1 (formerly Section 3.5.2, Table 3-2): Removal of condition the POTW Authority can evaluate and approve an alternate sample type. Addition of allowance for Process & Non-Process Wastewater with a maximum daily flow of 10,000 gpd or greater to use a grab sample if the discharge lasts less than four hours.
- Section 3.4.3 (formerly Section 3.5.3): Addition of requirement when submitting a variance request. Applicant shall include a description of efforts made to comply with the limit for which the variance is being sought.
- Section 3.6.10.2: Clarification that screening analyses must be data taken within the ninety (90) days prior of submitting the Notification Form.
- Section 3.6: Update how Permittees submit a Notification Form or Notice of Change for the new online Notification Form
- Section 3.7: Addition of section regarding submitting Confidential Business Information and requirements.
- Section 3.9.5: Removal of the requirement and word ‘Approval.’ POTWs are not required to respond to notifications with an approval in writing or otherwise.
- Section 4.2, Table 4-1, Footnote 1 (formerly Section 5.1, Table 5-1, Footnote 1): Exclusion of pH effluent limits for variance requests.
- Section 4.3.2.3 (formerly Section 4.2.2.3): Updated submittal date requirement of pH Status reports.
- Section 4.4 (formerly Section 4.3): Removal of sufficiently sensitive test method requirement.
- Section 4.4 (formerly Section 4.3): Clarification that pH, temperature, and total residual chlorine do not have to be performed by a laboratory certified by the Connecticut Department of Public Health.
- Section 4.5 (formerly Section 4.4): Removal of specified minimum levels. Addition of requirement that the minimum levels shall be at or below the level of the applicable effluent limit, or shall be above the applicable effluent limit, but the amount of the pollutant is high enough that the method detects and quantifies the level of the pollutant.
- Section 4.5 (formerly Section 4.4): Clarification that the use of ‘0.0’ is for when the concentration is below the minimum level and the parameter to be reported requires a computation, like grab sample average, average monthly limit.
- Section 4.6 (formerly Section 4.5): Removal of allowance that the POTW can approve an alternate sample type.
- Section 4.8 (formerly Section 4.6): Removal of allowance that the POTW can approve an alternate flow monitoring plan. Addition of approval to use estimates of flow for Process Wastewater with

flows less than 5,000 gpd and Non-process Wastewater. Estimates shall be based on information from a dedicated incoming water meter, a batch treatment tank volume, the accurate timed filling of a container of known volume, a rated pump capacity, or other generally acceptable engineering practice.

- Section 4.8 (formerly Section 4.6): Update to requirement for operator to check flow chart recorder once per day instead of twice per day.
- Section 4.9 (formerly Section 4.7): Update to require continuous pH monitoring for Process Wastewaters with pH adjustment. Requirement no longer includes Non-process Wastewaters with pH adjustment.
- Section 4.9 (formerly Section 4.7): Clarification that for discharges that do not require continuous monitoring.
- Section 4.13.2.1 (formerly Section 4.10.2.1): Removal of Operation and Maintenance Plan exception for Permittees without treatment systems.
- Section 4.13.2.1 (formerly Section 4.10.2.2): Addition that facilities covered by plans prepared or approved under the Resource Conservation and Recovery Act and the Spill Prevention, Control and Countermeasure program, do not have to include the components already addressed by those plans in their Spill Prevention and Control Plan.
- Section 3.5 (formerly Section 4.11): Updated language requiring prior approval from POTW for facility modifications to language that requires the Permittee to meet all requirements from the POTW Authority prior to initiating the change.
- Section 4.14: Replacement of Vehicle Maintenance with Commercial Carwashes for discharges that would require the Permittee to develop and implement a PFAS Source Identification and Reduction Plan.
- Section 4.2, Table 4-1 (formerly Section 5.1, Table 5-1): Addition of total residual chlorine limit of 3.0 mg/L.
- Section 4.7 (formerly Section 5.2): Addition of monitoring location requirement for Process/Non-process Wastewaters where samples must be representative of the wastewater and taken prior to comingling with domestic wastewater.
- Section 4.7, Table 4-3 (formerly Section 5.2, Table 5-2): Addition of total residual chlorine monitoring requirement for Potable Water System Maintenance or Sampling and Swimming Pool Wastewater.
- Section 4.7, Table 4-3 (formerly Section 5.2, Table 5-2): Removal of oil and grease (non-polar material) and temperature as monitoring parameters for Potable Water System Maintenance of Sampling Wastewater.
- Section 4.7, Table 4-3 (formerly Section 5.2, Table 5-2): Removal of PFAS monitoring for Vehicle Maintenance Wastewater.
- Section 4.10, Table 4-4 (formerly Section 5.3, Table 5-3): Update of PFAS monitoring frequency from quarterly to semi-annually.

- Section 4.15.4 (formerly Section 5.4.4): Removal of ‘Any wastewater resulting from this prior cleaning must be analyzed to determine if it can be discharged under the authority of this general permit.’
- Section 4.15.5 (formerly Section 5.4.5): Removal of bullet requiring noncontact cooling water and heat pump water to be derived solely from once through heat exchange systems or condensate which does not receive chemical additions of any kind.
- Section 6.18.3 (formerly Section 8.18.3): Addition of ‘Information about incident reporting can be found on [DEEP’s Emergency Response and Spill Prevention website](#).’
- Section 6.25 (formerly Section 8.25): Permit authorization is no longer transferrable.
- Section 7 (formerly Section 9): Added Variance Provision as Section 7.1 clarifying approval process and authorization.
- Section 8 (formerly Section 10): Update to definition of ‘annual’ to allow samples to be collected in any month of the year.
- Section 8 (formerly Section 10): Addition of definitions of: Excessive Foaming, PFAS, pretreatment, semi-annually, and upset.
- Section 8 (formerly Section 10): Replacement of defining ‘CGS’ with ‘Conn. Gen. Stat’ and ‘RCSA’ with ‘Regs. Conn. State Agencies.’
- Section 8 (formerly Section 10): Clarification of minimum level definition in update where minimum levels are not specified.
- Section 8 (formerly Section 10): Update to definition of Notification. Replacement of ‘Notification’ with ‘Notification Form.’ Clarified that it is the application created by DEEP.
- Section 8 (formerly Section 10): Update to definition of Total Volatile Organics to remove acetone, diethyl ether, p-dioxane, and methyl ethyl ketone to align with the volatile organics listed in the Regs. Conn. State Agencies Section 22a-430-4, Appendix B, Table II: Volatiles.
- Appendix A: Update to Operation and Maintenance Plan requirements: to address plan elements, *only if applicable*; to add quarterly maintenance requirements to the maintenance schedule; etc.
- Appendix B: Replacement of requirement to inventory all substances with requirement to inventory all toxic and hazardous substances.
- Appendix B, Element 6: Update to internal reference from ‘element 2’ to ‘element 1’ in Appendix B.
- Appendix D: Update to MDC address.
- Appendix H: Added clarification that the following categories of wastewater are included in PFAS screening and PFAS permit conditions only if the wastewater generating activities involve or previously involved AFFF or firefighting: Other Airport Operations (Commercial and Civil Aviation); Airports, Flying Fields, and Services; All Other Support Services; Other Technical and Trade Schools; Government Establishments of the Armed Forces, Including the National Guard, Primarily Engaged in National Security and Related Activities; and Establishments of the Armed Forces and National Security.

8.2 Changes to Fact Sheet

- Grammatical and spelling errors corrected throughout the permit.
- Sections were relocated to align with Agency wide standards.
- Internal permit references have been updated.
- Updated the application submittal process.
- Minor language changes not affecting permit conditions made throughout the permit for clarity and ease of reading; language changes potentially affecting permit conditions listed separately.
- Dewatering and Remediation Wastewater, Temporary & Short-term Discharges, and Emergency Discharges have been removed. Conditions and requirements for these discharges (formerly Section 6). These discharges are now covered solely under the SIU GP to ensure consistent review and oversight.
- Section 2.2.1: Addition of the following wastewaters categories: potable water system maintenance or sampling wastewaters and swimming pool wastewaters.
- Section 3: Update to refer to the application for authorization under the general permit as the 'Notification Form.'
- Section 3.2: Clarified that Existing Permittees with variances approved can continue to discharge utilizing these approved variances until a determination is made on the variance request under the 2025 Non-SIU GP.
- Section 3.5: Update that a Notice of Change is required to submit screening results for New Permittees.
- Section 4.4: Sufficiently sensitive requirement was removed. The minimum levels updated to be at or below the level of the applicable effluent limit, or if above the applicable effluent limit, the amount of the pollutant shall be high enough that the method detects and quantifies the level of the pollutant.
- Section 5.1.2: Added prohibition that the discharge shall not have a pollutant load that will cause interference, have a pH outside of the effluent limits of the general permit, or contain boil-out and/or boiler acid cleaning wastewaters.
- Section 5.2: Removal of allowance of alternate flow monitoring plan. Addition of allowance of estimates of flow to meet the flow requirements for Process Wastewaters less than 5,000 gpd or Non-process Wastewaters (all flows). Estimates of flow shall be based on information from a dedicated incoming water meter, a batch treatment tank volume, the accurately timed filling of a container of known volume, a rated pump capacity, or other generally acceptable engineering practice.
- Section 5.5: Clarification that analyses must be completed in a certified laboratory except for analyses for pH, temperature and total residual chlorine.
- Section 5.6.1 (Formerly Section 6.1): A limit for total residual chlorine was added along with screening and monitoring requirements for this parameter for potable water system maintenance or sampling wastewater and swimming pool wastewater.

- Section 8: Added Summary of Significant Changes Following Public Comment Period.
- Section 9 (formerly Section 10): Updated Public Participation Section to account for actions since Notice of Tentative Determination.

9.0 Public Participation

On April 28, 2025, DEEP's Water Permitting & Enforcement Division ("WPED") published notice of its tentative determination to reissue the General Pretreatment Permit for Non-Significant Industrial User Discharges to Publicly Owned Treatment Works. The notice of tentative determination and draft copy of the permit and its fact sheet were concurrently posted on DEEP's website. The notice provided a thirty (30) day public comment period.

Public comments were received during the notice period. The comments have been evaluated and WPED has made changes to the proposed permit in response. The public comments and WPED's responses are included in the Response to Comment document.

No petitions for hearing were received during the public comment period. The proposed final permit and fact sheet includes revisions from those published with the notice of tentative determination.