

Guidance for POTWs: The 2025 Non-SIU General Permit

Purpose and Role: The Publicly Owned Treatment Works (POTW) Authority plays a critical role centered on local review, the development of local rules and regulations, and establishing rate structures for industrial dischargers.

Key POTW Responsibilities

POTWs are responsible for the following key functions regarding the Non-SIU General Permit (GP):

- **Establishing Local Procedures:** Develop local procedures for reviewing and processing Notifications from industrial users seeking coverage.
 - **Managing Local Requirements:** Provide information to industrial users regarding local rules, regulations, and fee/rate requirements.
 - **Receiving Documentation:** Accepting copies of DEEP submissions from industrial dischargers, including notification forms, variance requests, and notices of change or termination.
 - **Providing Guidance:** Directing dischargers to the DEEP website for permit requirements and forms.
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Processing Notifications and Submittals

1. Initial Notification Form

- **Process:** Industrial dischargers submit information via DEEP's automated website and receive a PDF copy.
- **Timeline:** The applicant must submit a copy of the completed form to the POTW within **48 hours**.
- **Rejection:** Coverage is obtained automatically unless rejected. The POTW may only reject a form if:
 - The form is incomplete, fails requirements, or the applicant failed to provide requested additional info within 15 days.
 - The discharge will cause pass-through or interference resulting in a violation of the POTW's NPDES permit.

- **Rejection Procedure:** A rejection letter detailing the reasons must be sent to DEEP and the Applicant. The Applicant may appeal to the Commissioner.

2. Notice of Change

- **Requirement:** Industrial users must notify both DEEP and the POTW of specific facility changes.
- **Format:** Uses the same online format as the initial Notification Form.
- **Triggers for Change Notice:**
 - Site Name Change
 - Facility modifications
 - Changes in flow
 - Variance requests

For a full list of changes that require a Notice of Change, visit: <https://portal.ct.gov/deep-NON-SIU-GP>

3. Variances

- POTWs are required to review and sign off on variance requests, ensuring the request does not violate general permit prohibitions.

4. Notice of Termination

- Dischargers must submit a Notice of Termination to DEEP within **14 days** of discharge cessation.
- The POTW is a mandatory recipient of this documentation.

Non-Compliance Reporting

Permittees must adhere to strict timelines when reporting non-compliance issues.

- **Reporting to DEEP:** Must occur within two (2) hours or twenty-four (24) hours of the permittee becoming aware of the circumstances, dependent on the type of non-compliance.
- **Reporting to POTW:** Must occur the **same day** the non-compliance is reported to DEEP.
- **Follow-up:** A follow-up report may be required.

Provide Non-Compliance Portal link to industrial users:

- [DEEP's non-compliance notification portal](#)
 - [DEEP's Non-compliance follow-up reporting portal](#)
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Action Plan: Next Steps for POTWs

To ensure compliance and readiness, POTWs should take the following steps:

1. **Review Documentation:** Review the Non-SIU GP and supporting documents on DEEP's Pretreatment Program website.
 2. **Mark Deadlines:** The deadline for **existing** Industrial Discharges is **March 1, 2026**.
 3. **Update Website:** Update the POTW website to reflect new requirements and provide a link to DEEP's Notification Form.
 4. **Establish Workflow:** Develop a process for reviewing forms and submittals.
 5. **Set Up Communication:** Designate a specific contact and dedicated email address for receiving Non-SIU forms.
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Resources

- **DEEP Pretreatment Program Website:** <https://portal.ct.gov/deep-industrial-pretreatment>
- **Non-SIU GP Notification Form** <https://portal.ct.gov/deep-NON-SIU-GP>
- **Noncompliance Notification Requirements:** <https://portal.ct.gov/deep-pretreatment-compliance-assistance>
- **Contact Email:** DEEP.Pretreatment@ct.gov