

# **General Pretreatment Permit for** Significant Industrial User, Dewatering, and Remediation **Discharges**

Permit Nos. CTSIU0000 and CTDRW0000

**Fact Sheet** 

This fact sheet sets forth the significant factual, legal, and policy considerations examined during preparation of this draft master 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 Pretreatment Program's permitting process by authorizing multiple similar activities under one permit 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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# General Pretreatment Permit for Significant Industrial User, Dewatering, and Remediation Discharges

## 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 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 POTW 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 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 discharging 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 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 October 30, 2020, DEEP issued the General Permit for the Discharge of Wastewaters from Significant Industrial Users ("2020 SIU GP"). The 2020 SIU General Permit consolidated specific categories of discharges from two (2) existing general permits, the General Permit for the Discharge of Wastewaters from Categorical Industrial Users to a Publicly Owned Treatment Works ("Categorical General Permit") and the General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater ("MISC General Permit") to provide consistent permit terms and conditions. The 2020 SIU GP covered Metal Finishing Wastewater, and Process and Non-process Wastewater from facilities not subject to Categorical Pretreatment Standards. The Categorical and MISC General Permits expired on October 30, 2020, and facilities that had permit coverage under those permits were required to apply for coverage under either the 2020 SIU GP, the General Permit for Discharges from Miscellaneous Industrial Users ("MIU GP"), or an individual pretreatment permit.

In this iteration of the general permit, the permit is expanding permit coverage to include Dewatering and Remediation Wastewater discharges, currently authorized under a different general permit. Additionally, the name of the permit has been updated to the *General Pretreatment Permit for Significant Industrial User Discharges to Publicly Owned Treatment Works* ("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 10, 2024, DEEP hosted a listening session to solicit comments on the existing permit and suggestions to improve the permitting process. On November 21, 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

This general permit authorizes discharge(s) from activities listed in the "Eligible Activities" Section of the general permit (Section 2.1), including the indirect discharges of the following wastewaters to a POTW, via the sanitary sewer or via transport by a licensed waste transporter, that meet the requirements and conditions contained in the permit:

- Discharges of the following wastewaters from a Significant Industrial User ("SIU"), as defined in 40 CFR 403.3(v):
  - Metal Finishing Wastewater Discharges include wastewaters subject to the provisions of 40 CFR 413 Electroplating Point Source Category or 40 CFR 433 Metal Finishing Point Source Category.

Note: Any of the forty (40) Ancillary Metal Finishing Operations as defined by this general permit are considered Metal Finishing Wastewater if any of the following operations are performed on site, regardless if they create a discharge:

- Electroplating
- Electroless plating
- Anodizing
- Coating (chromating, phosphating, and coloring)
- Chemical etching and milling
- Printed circuit board manufacturing.

Tumbling and cleaning of metal parts can be considered metal finishing (etching) if an acid solution with a pH below 4.5 S.U. is used in the process.

- O Process Wastewater Discharges mean 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.
- Non-Process Wastewater Discharges mean any water, not subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, subchapter N which, is not a Process Wastewater, Dewatering Wastewater, or Remediation Wastewater.
- Discharges of the Following Wastewaters:
  - O Dewatering Wastewater include wastewaters generated from activities such as, pumping accumulated stormwater or groundwater from an excavation, pumping water from a cofferdam, wastewater generated by removing/replacing an underground storage tank, or pumping surface water that has been diverted onto a construction site.
  - Remediation Wastewater include wastewaters generated during remediation activities in connection with the investigation of pollution or the result of remediating polluted groundwater, sediment, or soil.

## 3.0 Application and Permit Authorization

In this iteration of the general permit, the application form for the General Pretreatment Permit for Significant Industrial User, Dewatering, and Remediation Discharges ("application") requirements were updated to provide a more streamlined process and to reduce the administrative burden for the applicants while obtaining the information necessary to evaluate the application for eligibility under the SIU GP. Updates include, but are not limited to, changes to fee requirements, updates to the application submittal process, removal of the NDDB requirement for indirect dischargers, removal of the water conservation attachment, updates to sampling requirements such that samples are more representative of the discharge entering the sanitary sewer, and removal of the certification from a qualified professional engineer or certified hazardous materials manager.

On October 22, 2015, the United States Environmental Protection Agency published the National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule ("NPDES eRule"), 40 CFR 127. The rule replaces most paper-based NPDES reporting requirements with electronic reporting and details in Appendix A to Part 127—Minimum Set of NPDES Data, the data required to be sent to EPA's Central Data Exchange ("CDX"). To comply with the federal regulations, in 2016 DEEP developed an eRule Implementation Plan. As part of that plan, on November 6, 2023, DEEP signed a Memorandum of Understanding ("MOU") with US EPA to develop an online application system.

At the time of drafting and issuing this general permit, DEEP was working with US EPA to develop the online application for the Industrial Stormwater General Permit. In May 2025, CT DEEP was notified by US EPA that the funding to support the development of the online application system had been rescinded and the application project was indefinitely suspended until further notice along with several other e-projects. DEEP changed course and began development of an online application to continue working towards meeting DEEP's 20by26 Goal 10, "Expand Tools for Online Services."

#### 3.1 Obtaining Permit Coverage

Any person who initiates, creates, originates, or maintains a discharge authorized by this general permit shall, if required by the general permit, file an application with the Commissioner that meets the application requirements of the general permit. Such application shall be submitted within the timeframe specified in the general permit including the applicable fee.

#### 3.2 Registration Review Timelines

Upon receipt of a complete application, DEEP will review it in accordance with agency policies and the application review regulations (see Section 22a-430 of the Regulations of Connecticut State Agencies). If an application is found to be incomplete, such as missing required attachments, signatures, or other information, the registrant will be notified. Depending on the nature of the deficiency, the registrant may be given an opportunity to provide the missing information; however, applications with severe deficiencies will be rejected outright. Applications that remain incomplete after e resubmittal deadline has passed will also be rejected, and the registrant will be required to submit a new application along with a new application fee. Please note that the registration fee is non-refundable.

Once an application is determined to be completed, DEEP will begin the technical review process and, if necessary, may request additional information. Applications can still be rejected during this stage of the review.

For complete applications, applicants should expect the review process to take approximately ninety (90) to one hundred eighty (180) days from the submittal of the registration fee to the issuance of a decision. Delays may occur near the registration deadlines established in the permit due to the anticipated high volume of submissions. Registrants are encouraged to submit applications well in advance of the deadline.

For more information on registration timelines, refer to DEEP's 20by26 Initiative: https://portal.ct.gov/deep/about/20by26/20by26-initiative/timely-permitting-decisions

## 3.3 Interim Coverage for Existing Permittees

Facilities with existing permit coverage as of October 30, 2025, under the General Permit for the Discharge of Wastewaters from Significant Industrial Users, issued October 30, 2020, are eligible for continued permit coverage under this general permit on an interim basis provided a complete application is filed with the Commissioner on or before ninety (90) days from the effective date of this general permit. Variances and monitoring waivers approved under the 2020 SIU GP will terminate upon issuance of the 2025 SIU GP Notice of Coverage.

For facilities with existing permit coverage as of October 30, 2025, under the General Permit for the Discharge of Groundwater Remediation Wastewater ("Groundwater Remediation GP"), a complete application shall be filed with the Commissioner on or before ninety (90) days from the effective date of this general permit.

For facilities with existing permit coverage under the Groundwater Remediation GP, permit coverage is continued under that general permit until authorization under the SIU GP is issued by the Commissioner. Authorization under the Groundwater Remediation GP will terminate upon issuance of the SIU GP Notice of Coverage.

#### 3.4 Short-term Discharges

The application is not required for Short-term Discharges, Temporary Discharges, and Emergency Discharges lasting no more than thirty (30) consecutive days. Authorization under this general permit is granted the day such discharges are initiated and all requirements from the POTW Authority are met. Emergency Discharges lasting more than thirty (30) days must file an application with the Commissioner.

#### 3.5 New Discharges

For new dischargers seeking coverage under the authority of this general permit, a complete application shall be filed with the Commissioner. The discharge is authorized under this general permit on the date of issuance of the Notice of Coverage.

## 3.6 Application Requirements

All applications shall be filed with DEEP on forms prescribed and provided by the Commissioner. An overview of the contents of the application is contained in Section 3 of the general permit.

## 3.7 Modification of an Existing Discharge Authorization

A Permittee with existing authorization to discharge under this general permit must submit a Notice of Change using forms prescribed by the Commissioner if any of the following criteria are met:

- To correct inaccurate or misleading information previously submitted to DEEP.
- At least fifteen (15) days prior to expanding or significantly altering its wastewater collection or treatment system or its method of operation.
- To request a monitoring waiver for a new parameter.
- To request a variance.
- To change to the nature of the activity generating the discharge.
- To introduce a new source of water.
- To introduce a new pollutant that was not present in the discharge at the time of application.
- To change the approved maximum daily flow.
- To relocate the monitoring location.

The information necessary to complete and submit a Notice of Change is described in the general permit.

Treatment system modifications do not require DEEP approval, contingent on the Permittee's compliance with the general permit. Treatment system modifications can be completed prior to submittal of a Notice of Change if the purpose of the wastewater treatment system modification is to correct or avoid a permit violation; in this scenario, the Permittee must submit a Notice of Change within fifteen (15) days of making the alteration. Failure to submit the Notice of Change would be a violation of the permit.

# 4.0 Summary of 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 has 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. In the 2020 SIU 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 Expanded Permit Coverage

The general permit has been updated to authorize discharges to the sanitary sewer that were previously covered under the General Permit for the Discharge of Groundwater Remediation Wastewater. This will consolidate all sanitary sewer discharges under the Pretreatment Program.

#### 4.4 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.

#### 4.5 Effluent Limits and Prohibitions

#### 4.5.1 Mercury

The limit for mercury was updated from  $0.2 \mu g/L$  to < [ML], where ML is the minimum level for analysis using EPA Method 1631E.

#### 4.5.2 Per- and polyfluoroalkyl substances (PFAS)

PFAS monitoring requirements have been included for facilities in specific Industry Categories and permittees, 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.

These Permittees shall develop a PFAS Source Identification and Reduction Plan to identify sources, review chemical substitutions, treatment, and operational changes to minimize the amount of PFAS discharged to the POTW.

PFAS monitoring requirements have also been included for Dewatering and Remediation Wastewater discharges with detectable concentrations of PFAS or expected to have detectable levels of PFAS.

#### 4.5.3 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 Permitters to comply with the new effluent limits.

#### 4.5.4 Temperature

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

## 4.5.5 Polychlorinated Biphenyls (PCBs)

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

#### 4.6 Updated Application

The contents of the application have been updated to be consistent with similar general permits issued by WPED. Updates to the application include: (1) removal of the certification requirement from a qualified professional engineer or certified hazardous materials manager (DEEP encourages facilities that need assistance completing the application to use the services provided by qualified professional engineers), (2) revised fee structure, (3) updates to the required screening analysis, (4) inclusion of per- and polyfluoroalkyl substances (PFAS) screening for applicants in industry sectors historically known to discharge PFAS, (5) updates to the application submittal process, (6) removal of the Natural Diversity Database ("NDDB") requirement, (7) removal of the water conservation description requirement, (8) a requirement to submit a copy of the Operation and Maintenance Plan and Spill Prevention and Control Plan, (9) a requirement for New Permittees to submit Plans and Specifications of their Wastewater Treatment System prepared by a professional engineer, (10) increased the amount of sample data required when submitting a waiver request, and (11) revised the requirement from obtaining approval from the POTW to providing proof of submission of a complete application to the POTW.

## 5.0 General Permit Conditions, Prohibitions, and Limits for All Discharges

#### 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 effluent 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.

#### 5.2 Monitoring Requirements

This general permit includes specific sampling frequencies and types to ensure compliance with the permit terms and conditions found in the general permit. Discharge Monitoring Reports ("DMRs") are required to be submitted electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet portal.

All discharges are required to monitor and report flow on the DMR except for those that do not require an application (Short-term UST, Temporary, and Emergency Discharges lasting less than thirty (30) days). The Permittee shall accurately determine the quantity of wastewater discharged and record both average monthly flow and maximum daily flow. Equipment and instrumentation (i.e., flow meter) shall be installed and maintained to accurately measure and record total daily flow (gpd), unless an alternate flow monitoring plan is approved by the Commissioner. Estimates of flow may be used to satisfy this requirement for discharges provided they are based on information from a generally acceptable engineering practice and approved by the Commissioner.

Discharges of Metal Finishing Wastewaters and Process Wastewaters that require pH adjustment shall continuously measure and record the pH of wastewater discharged unless alternate monitoring is approved by the Commissioner.

#### 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.

All data collected must be submitted through EPA's online NetDMR portal as identified in the permit or otherwise specified by the Commissioner.

#### 5.4 Duty to Correct, Record, and Report Violations

Consistent with the Regs. Conn. State Agencies, Permittees are required to immediately take all reasonable actions to correct known noncompliance with the conditions of this general permit. In the event that such noncompliance may endanger human health or the environment, the Permittee must notify DEEP. This section was modified to provide concise and consistent requirements for how and when to report a permit violation. DEEP has developed an online Noncompliance Reporting web-based platform accessible on our website: <a href="https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements">https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements</a>.

#### 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.

## 6.0 Permit Conditions & Proposed Changes for Metal Finishing Discharges

Metal Finishing 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 5.1, Table 5-1: Effluent Limits for Metal Finishing Discharges, of the general permit. The following table compares limits from 40 CFR 433.17, Section 22a-430-4(s) of the Regs. Conn. State Agencies, the 2020 SIU GP, and those developed using best professional judgement ("BPJ"). The most stringent of the applicable limits are applied for each parameter and shaded in the table. Effluent limits continue to be protective of the waters of the state and were therefore carried forward from the previous permits in accordance with anti-backsliding regulations, the Regs. Conn. State Agencies Section 22a-430-4(l)(4)(D)(vi) and 40 CFR 122.44(l)(1). Monitoring frequencies were carried forward from the 2020 SIU GP.

## 6.1 Summary of Changes from the 2020 SIU GP

The following parameters were added to this iteration of the general permit, consistent with the limits for Process and Non-process Wastewater discharges under the 2020 SIU GP providing expanded permit coverage for facilities discharging Metal Finishing Wastewater(s) that have these pollutants present: antimony (total), arsenic (total), beryllium (total), biochemical oxygen demand (BOD<sub>5</sub>), chemical oxygen demand (COD), ethylene glycol, formaldehyde, molybdenum (total), total Kjeldahl nitrogen (TKN), nitrate-nitrite (as N), polynuclear aromatic hydrocarbons (PAH), propylene glycol, selenium (total), strontium (total), thallium (total), vanadium (total), and zirconium (total).

		40 CFR 433.17			Regs. Conn. State Agencies Section 22a-430-4(s)(2)			2020 SIU GP			Changes in 2025 SIU GP		
Parameter	Units	Average Monthly	Maximum Daily	Instantaneous	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				NC	NC	NC
Antimony, Total	mg/L	NA	NA	NA	NA	NA	NA				NC	4.0	4.0
Arsenic, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		0.10	0.10
Barium, Total	mg/L	NA	NA	NA	2.0	4.0	6.0	2.0	4.0	6.0	NC	NC	NC
Beryllium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		2.0	2.0
BOD <sub>5</sub>	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		600.0	600.0
Cadmium, Total	mg/L	0.07	0.11	NA	0.07	0.11	0.75	0.07	0.11	0.16	NC	NC	NC
COD	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		1,200.0	1,200.0
Chromium, Hexavalent	mg/L	NA	NA	NA	0.1	0.2	0.3	0.1	0.2	0.3	NC	NC	NC
Chromium, Total	mg/L	1.71	2.77	NA	1.0	2.0	3.0	1.0	2.0	3.0	NC	NC	NC
Cobalt, Total	mg/L	NA	NA	NA	NA	NA	NA				NC	4.0	4.0
Copper, Total	mg/L	2.07	3.38	NA	1.0	2.0	3.0	1.0	2.0	3.0	NC	NC	NC
Cyanide, Amenable	mg/L	NA	NA	NA	0.1	0.2	0.3	0.1	0.2	0.3	NC	NC	NC
Cyanide, Total	mg/L	0.65	1.20	NA	0.65	1.2	NA	0.65	1.2	1.8	NC	NC	NC
Ethylene Glycol	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		300.0	300.0
Fluoride	mg/L	NA	NA	NA	20.0	30.0	45.0	20.0	30.0	45.0	NC	NC	NC
Formaldehyde	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		10.0	10.0
Gold, Total	mg/L	NA	NA	NA	0.1	0.5	0.75	0.1	0.5	0.75	NC	NC	NC

		40 CFR 433.17			Regs. Conn. State Agencies Section 22a-430-4(s)(2)			;	2020 SIU G	P	Changes in 2025 SIU GP		
Parameter	Units	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Iron, Total	mg/L	NA	NA	NA	NA	NA	NA				NC	NC	NC
Lead, Total	mg/L	0.43	0.69	NA	0.1	0.5	0.75	0.1	0.5	0.75	NC	NC	NC
Mercury, Total	μg/L	NA	NA	NA	NA	NA	NA	ND<0.2	ND<0.2	ND<0.2	<[ML]	<[ML]	<[ML]
Molybdenum, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		4.0	4.0
Nickel, Total	mg/L	2.38	3.98	NA	1.0	2.0	3.0	1.0	2.0	3.0	NC	NC	NC
Nitrogen, Total	mg/L	NA	NA	NA	NA	NA	NA			40.0	NC	40.0	NC
TKN	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Nitrate-nitrite (as N)	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Oil & Grease, Non- polar Material	mg/L	NA	NA	NA	NA	NA	NA		100.0	150.0	NC	NC	NC
Organics, Total Toxic	mg/L	NA	2.13	NA	NA	NA	NA			2.13	NC	NC	NC
PFAS	ng/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
рН	S.U.	NA	NA	NA	NA	NA	NA	NA	NA	5.0-12.0	NC	NC	5.5-10.0
Phosphorus, Total	mg/L	NA	NA	NA	NA	NA	NA				NC	NC	NC
РАН	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		0.5	0.5
Propylene Glycol	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		300.0	300.0
Selenium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		0.5	0.5
Silver, Total	mg/L	0.24	0.43	NA	0.1	0.5	0.75	0.1	0.43	0.64	NC	NC	NC
Solids, Total Suspended	mg/L	NA	NA	NA	NA	NA	NA		100.0	150.0	NC	NC	NC

		40 CFR 433.17			Regs. Conn. State Agencies Section 22a-430-4(s)(2)			2020 SIU GP			Changes in 2025 SIU GP		
Parameter	Units	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous	Average Monthly	Maximum Daily	Instantaneous
Strontium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		2.0	2.0
Temperature	°F	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	140
Thallium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		2.0	2.0
Tin, Total	mg/L	NA	NA	NA	2.0	4.0	6.0	2.0	4.0	6.0	NC	NC	NC
Titanium, Total	mg/L	NA	NA	NA	NA	NA	NA					4.0	4.0
Vanadium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		2.0	2.0
Zinc, Total	mg/L	1.48	2.61	NA	1.0	2.0	3.0	1.0	2.0	3.0	NC	NC	NC
Zirconium, Total	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA		2.0	2.0

## Remarks:

- 1. Abbreviation used for units are as follows: mg/L means milligrams per liter; ng/L means nanograms per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NC means No Change in Reissuance.
- 2. If "---" is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

# 7.0 Conditions & Proposed Changes for Process and Non-process Wastewater 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 6 - Effluent Limits for Process and Non-process Wastewater not Subject to Categorical Pretreatment Standards, of the general permit. Effluent limits for discharges of Process and Non-process Wastewater have not changed since the 2020 SIU GP other than the changes applicable to all discharges outlined in Section 4 of this fact sheet and the changes in Section 7 below. DEEP determined that the numeric effluent limits continue to be protective of the waters of the state and were therefore carried forward from the previous iteration of the general permit.

## 7.1 Summary of Changes from the 2020 SIU GP

- A limit for total residual chlorine was added, 3.0 mg/L. Total residual chlorine is required
  for monitoring 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, consistent with the numeric effluent limits for Metal Finishing Wastewaters. 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, Table 6-2 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 G or I expected in the discharge.
- The monitoring frequency in Table 6-3 of the general permit was updated to at least annually to demonstrate compliance with the permit.
- Effluent flow monitoring and reporting, via NetDMR is required for all discharges.

## 8.0 Conditions Applicable to Dewatering and Remediation Wastewater

This general permit incorporates the wastewater discharges from the *General Permit for the Discharge of Groundwater Remediation Wastewaters*, ("Groundwater Remediation General Permit"). Dewatering and Remediation Wastewaters under the authority of this general permit shall not exceed and shall otherwise conform to the specific terms and conditions listed in Section 7.1, Table 7-1: Effluent Limits for Dewatering and Remediation Wastewaters, of the general permit. Limits for Dewatering and Remediation Wastewater have been carried forward from the Groundwater Remediation General Permit with the following exceptions:

- The limit for magnesium was not carried forward.
- A limit for total suspended solids ("TSS") was added and aligns with the TSS limit for Process and Non-process wastewater discharges in the general permit.
- The limits for silver, tin and zinc were updated to align with the maximum daily limits listed in Regs. Conn. State Agencies 22a-430-4(s).

Monitoring frequencies were carried forward.

Permittees shall monitor for the parameters identified in Table 7-2 of this general permit at the sampling frequencies prescribed in Table 7-3 of the general permit.

## **8.1 Startup Procedures**

Each discharge must be monitored the day it is initiated. Discharges lasting more than a week (seven days) must be sampled at least once during the second week of discharge. If the discharge ceases, the startup procedures must be repeated in accordance with the general permit requirements.

#### 8.2 Prohibitions for Dewatering and Remediation Wastewater

Discharges of dewatering and remediation wastewater shall not:

- Contain any sludge and/or bottom deposits from any storge tank or basin.
- Contain the washout of concrete, except as authorized under this general permit.
- Contain washout and/or cleanout of stucco, paint, form release oils, curing compounds, and other construction materials.
- Contain fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance, except as authorized under this general permit.
- Contain soaps, solvents, or detergents used in vehicle and equipment washing or external building washdown.
- Contain toxic or hazardous substances from a spill or other release, except as authorized under this general permit.

• Contain radioactive material as defined by Section 22a-148 of the Conn. Gen. Stat...

#### 8.3 Erosion and Sediment Control

Erosion and sediment control measures shall be installed and maintained as required in compliance with the standards set forth in the "2024 Connecticut Guidelines for Soil Erosion and Sediment Control" as amended, established pursuant to Section 22a-328 of the Conn. Gen. Stat.

## 9.0 State Regulations of Connecticut State Agencies

The Permittee shall comply with the standard permit conditions in 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.

## 10.0 Federal Regulations

The Permittee shall comply with the applicable federal regulations, 40 CFR Parts 122, 123, 127, 136, 40 CFR Chapter I, Subchapter N, 403, 413, and 433, which are hereby incorporated into this general permit, as is fully set forth herein.

## 11.0 Commissioner's Powers

The Commissioner may approve an application or Notice of Change with additional permit terms and conditions. If the Commissioner approves an application with additional permit conditions, the Permittee shall be bound by such permit terms and conditions as if they were a part of this general permit.

#### 12.0 Variance Provision

The Commissioner may grant variances from the numeric effluent limits specified in Tables 5-1, 6-1, and 7-1 of this general permit. Variance requests for Section 5.1 of this general permit will be considered for average monthly, maximum daily, or maximum instantaneous limits for only the parameters referenced by Footnote 5 of Table 5-1. In the reissuance of this general permit, massloading caps were removed to provide flexibility based on the receiving POTW's capacity and treatment system. Permittees seeking a variance must provide additional information to support their request to ensure protection of the collection and treatment system, not result in pass through or interference or cause or contribute to violations of the POTW's discharge permit.

## 13.0 Antidegradation

Such activity is consistent with the Antidegradation Standards of section 22a-426 of the Regs. Conn. State Agencies.

## 14.0 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.

## 14.1 Changes to the Permit

- The name of the permit was changed to the General Pretreatment Permit for Significant Industrial User, Dewatering, and Remediation Discharges.
- A second permit number was added for Dewatering and Remediation discharges for data management purposes.
- Several sections were relocated to align with formatting of several other general permits being issued by the DEEP in 2024 and 2025.
- Grammatical and spelling errors corrected throughout the permit.
- 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.
- Section 2.1: Clarification on eligible activities: Forty (40) ancillary metal finishing operations are eligible discharges if one of the 6 core metal finishing operations is performed on site.
- Section 2.1: Updated eligibility language to include all discharges of Dewatering and Remediation Wastewater, including Short-term Discharges and Emergency Discharges and removed Temporary Discharges from that description.
- Section 2.1: Clarification that residuals generated by water treatment facilities are not authorized by this general permit.
- Section 2.5.1: Clarification that variances and monitoring waivers from the Notice of Coverage issued during the permit term of the 2020 issuance of the SIU GP remain in effect until a determination is made on the timely application submitted under the 2025 SIU GP.
- Section 2.5.2: Update to effective date of authorization of New Permittees from the first day of the month following the issuance of a Notice of Coverage to the date of issuance of the Notice of Coverage.
- Section 3.1: Updated to allow the submittal of more than one application for a site if there are discharges of both metal finishing, process or non-process wastewaters and dewatering and remediation wastewaters.
- Section 3.3: Updated to include additional modifications requiring a fee for a Notice of Change.
- Section 3.5.1.1: Clarification that Certification of No Change can be submitted if no significant change has been implemented at the site since the last application or modified application submitted. Also, clarification that removal of an outfall is not considered significant in regards to submitting a Certification of No Change.
- Sections 3.5.5, 3.5.6, and 3.5.7: Updated certification language.
- Section 3.5.5: Update to Certification of No Change language: Clarification that Registrants are eligible for a Certification of No Change if there have been no major changes since the last

- filing of the application or modified application. Clarification that removing an outfall does not count as a major change.
- Section 3.5.6: Removal of language in Registrant Certification that pertained to audits to qualified professional engineers ("QPE") since not relevant without the QPE requirement in the 2025 issuance.
- Section 3.5.8: Updated from POTW approval to a written notification to the POTW.
- Section 3.5.9 (Section 3.6.9 in public noticed draft): Addition of site information requirement in the application. Applicants of Dewatering and Remediation Wastewater shall submit their site plan with the location(s) of all erosion and sediment controls and energy dissipation structures.
- Section 3.5.10.2: Updated to require a copy of lab reports be submitted with analytical data required for the application.
- Section 3.5.10.2: Addition of monitoring location requirements to the analytical data requirements of the application.
- Section 3.5.10.2: Clarification that all screening analyses for the application must be taken within six (6) months prior to submitting the application.
- Section 3.5.10.2: Replacement of Vehicle Maintenance Wastewater with Commercial Carwash Wastewater for types of wastewater requiring PFAS screening due to clerical error.
- Section 3.5.10.2: Addition of screening requirement for treated Dewatering and Remediation Wastewaters for Permittees who have already commenced discharge.
- Section 3.5.10.2: Update to screening requirements for Metal Finishing Wastewater. Replacement of submitting data for pollutants that are known or suspected present in Tables 7 through 9 with Tables 6 through 9.
- Section 3.5.10, Table 3-2: Removal of minimum level requirements for Dewatering and Remediation Wastewater application screening.
- Section 3.5.10, Table 3-2: Removal of magnesium screening for applications of Dewatering and Remediation Wastewater.
- Section 3.5.10.2: Clarification on difference in procedures for providing analytical data for New Registrants and Existing Permittees. New Registrants of Dewatering and Remediation Wastewater will need to provide analytical results of the raw wastewater. All other New Registrants shall provide projections of the pollutant concentrations. All New Registrants will provide the screening data within thirty days of commencing discharge in accordance with their Notice of Coverage.
- Section 3.5.10.2: Included requirement to submit a copy of lab reports with the application.
- Section 3.5.12: Addition of language requiring a minimum of 10 sampling events for monitoring waiver request.
- Section 3.5.13: Addition of requirement that all applicants (except those registering Dewatering and Remediation Wastewaters only) are required to submit Attachment H and submit the Operation and Maintenance Plan and Spill Prevention and Control Plan with the application. The allowance of not needing an Operation and Maintenance Plan Checklist for

- registering discharges without a treatment system has been removed.
- Section 3.5.17: Additional requirements for requesting a variance request.
- Section 3.5.19: Addition of application requirement for New Permittees with wastewater treatment systems. New Permittees shall submit (1) a description of the treatment system and (2) plans and specifications of the treatment system. Plans and specifications shall be prepared by a professional engineer unless the system is a pre-engineered system.
- Section 3.6: Addition of "Request an Amendment or Modification" section.
- Section 3.7 (Section 3.8 in public noticed draft permit): Update on how Permittees submit an application or Notice of Change.
- Section 3.8: Addition of section regarding submitting Confidential Business Information and requirements.
- Section 4.2.2.6: Update to how to submit pH status reports from submitting via email to submitting via an attachment to the July and January DMR. Update to include plan to come into compliance with pH limits in the pH Status Reports.
- Section 4.3: Removal of sufficiently sensitive test method requirement.
- Section 4.4: Removal of specified minimum levels for the purpose of enforcing method sensitivity. Addition of requirement that the minimum levels shall be at or below the level of the applicable effluent limit, or if above the applicable effluent limit, shall be high enough that the method detects and quantifies the level of the pollutant.
- Section 4.5: Addition of footnote allows a grab sample if the discharge lasts less than four hours.
- Section 4.6: Update to requirement for operator to check flow chart recorder once per day instead of twice per day. Clarified language regarding flow logs.
- Section 4.7: Update to require continuous pH monitoring for Metal Finishing Wastewaters and Process Wastewaters with pH adjustment. Clarification that discharges without continuous monitoring are only required to analyze pH based on the monitoring frequencies specified in Section 5.2.2, 6.4, and 7.4 of the general permit. Clarified language regarding pH logs.
- Section 4.8: A section specifically regarding Record Keeping was added as Section 4.8.1. Electronic Reporting was moved to 4.8.2 and Record Retention was moved to 4.8.3.
- Section 4.8.2 (Section 4.8.1 in public noticed draft permit): Clarification on what reports are to be attached to NetDMRs: lab reports, additional monitoring, monitoring waivers, SMP certifications, pH Status Reports, PFAS Status Reports, and calculations used to determine compliance. Addition of requirement for New Registrants waiting for access to NetDMR shall attach all monitoring data required during this waiting period to the first discharge monitoring report available in NetDMR.
- Section 4.10.2.2: Clarified 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.
- Section 4.11 (Section 4.14 in public noticed draft): 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 due to clerical error.
- Section 5.1, Table 5-1: Removal of minimum levels.
- Section 5.1, Table 5-1: Update cyanide limits to require amenable cyanide monitoring after cyanide destruction system when applicable and not in lieu of total cyanide monitoring.
- Section 5.1, Table 5-1: Update to effluent limit for mercury from "ND<0.05" to "<[ML]" where 'ML' means the minimum level for analysis using EPA Method 1631E.
- Section 5.2.1: Addition of monitoring location requirement for Metal Finishing Wastewaters where samples must be representative of the wastewater and taken after all treatment units.
- Section 5.2.2, Table 5-2: Update PFAS monitoring frequency to semi-annually from quarterly.
- Section 6.1, Table 6-1: Removal of minimum levels.
- Section 6.1, Table 6-1: Addition of total residual chlorine limit of 3.0 mg/L.
- Section 6.2, Table 6-1: Update to effluent limit for mercury from "ND<0.05" to "<[ML]" where 'ML' means the minimum level for analysis using EPA Method 1631E.
- Section 6.3: Addition of monitoring location requirements. For Group I and II Wastewaters, samples must be representative of the wastewater and taken prior to mixing with domestic sewage. Move of photographic processing wastewater sampling requirement from Section 6.4 to 6.3 of the general permit.
- Section 6.3, Table 6-2: Addition of total residual chlorine monitoring requirement for Potable Water System Maintenance or Sampling and Swimming Pool Wastewater.
- Section 6.3, Table 6-2: Removal of oil and grease (non-polar material) and temperature as monitoring parameters for Potable Water System Maintenance of Sampling Wastewater due to clerical error.
- Section 6.3, Table 6-2: Removal of PFAS monitoring for Vehicle Maintenance Wastewater due to clerical error.
- Section 6.4, Table 6-3: Update of PFAS monitoring frequency from quarterly to semi-annually.
- Section 6.4, Table 6-3: Addition of a footnote specifying that samples must be collected the following month if there is no discharge in the required sampling month.
- Section 6.5.5: 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 7.1, Table 7-1: Removal of minimum levels and limits for magnesium and PFAS.
- Section 7.2: Addition of monitoring and application screening location requirement for Dewatering and Remediation Wastewaters where samples must be representative of the treated wastewater and taken prior to comingling with domestic wastewater. Addition of requirement where a raw wastewater sample shall be taken as part of the application screening.
- Section 7.6: Replacement of 'If authorized activities' with 'Dewatering and Remediation Wastewaters.' Erosion and sediment control measures are required to be installed and maintained in compliance set forth in "Connecticut Guidelines for Soil Erosion and Sediment

Control."

- Section 9.18.3: Addition of 'Information about incident reporting can be found on DEEP's Emergency Response and Spill Prevention website.'
- Section 9.25: Updated to specify that the permit is not transferable.
- Section 10.4: Update to where Notice of Facilities in Significant Noncompliance will be posted. The list will be posted on the DEEP website.
- Section 11: Addition of definitions: ancillary metal finishing operations, excessive foaming, PFAS, pretreatment, semi-annually, and upset.
- Section 11: Replace 'Approval of Registration' with Notice of Coverage.
- Section 11: Modification of 'Certification of No Change' definition to include an allowance for sites that have not had any significant changes since the last modified application filed. Modification to exclude removing an outfall as a significant change.
- Section 11: Replacement of defining 'CGS' with 'Conn. Gen. Stat' and 'RCSA' with 'Regs. Conn. State Agencies.'
- Section 11: Clarification of minimum level definition in update where minimum levels are not specified.
- Section 11: 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; and to add required training an operator must complete to run the system.
- Appendix B, Element 6: Update to internal reference from 'element 2' to 'element 1' in Appendix B.
- Appendix C, Element 6: Update to internal reference from 'element 8 of this Appendix' to 'element 7 of Appendix B.'
- Appendix E: Added Windham to the list of towns for which phosphorus monitoring is required.
- Appendix F: 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.

## 14.2 Changes to the Fact Sheet

- Several sections were relocated to align with formatting of several other general permits being issued by the DEEP in 2024 and 2025.
- Grammatical and spelling errors corrected throughout the permit.
- Minor language changes not affecting permit conditions made throughout the fact sheet for clarity and ease of reading; language changes potentially affecting permit conditions listed separately.
- Section 2.0: Clarified note on operations that can fall under the metal finishing category.
- Section 2.0: Revised eligibility language to include all discharges of Dewatering and Remediation Wastewater.
- Section 3.2: Clarified that Existing Permittees with variances approved can continue to discharge utilizing these approvals until a determination is made on the application under the 2025 SIU GP.
- Section 3.3: Included clarification that POTW Authority requirements must be met for Short-term, Temporary, and Emergency Discharges to be authorized under the general permit.
- Section 3.4: Updated date of authorization for New Permittees to date of issuance of the Notice of Coverage.
- Sections 4.4 and 5.5: 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 concentration of the pollutant shall be high enough that the method detects and quantifies the level of the pollutant.
- Section 4.5.1: The effluent limit for mercury was updated from 0.05 μg/L to "<[ML]", where ML is the minimum level for analysis using EPA Method 1631E.
- Section 4.5.2: Categories of wastewater that require PFAS monitoring and completing a PFAS Identification and Minimization Plan has been updated to remove Vehicle Maintenance Wastewater and add Commercial Car Wash Wastewater and include Dewatering and Remediation Wastewater discharges with expected concentrations of PFAS.
- Section 4.6: Registration requirements have been updated to require all Registrants to submit a copy of their Operation and Maintenance Plan and their Spill Prevention and Control Plan. New Permittees are required to submit plans and specifications of their wastewater treatment system prepared by a professional engineer. Additionally, the waiver request form will require a minimum of 10 samples to demonstrate eligibility for a monitoring waiver and the POTW approval form has been revised to a POTW notification form.
- Section 5.1.2: Added prohibition that the discharge shall not 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: Update that Process Wastewaters with pH adjustment need continuous pH monitoring. The condition no longer applies to Non-process Wastewaters.
- Section 7.0: 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 8.0: Reference to the General Permit for the Discharge of Dewatering and Remediation Wastewaters was replaced with the General Permit for the Discharge of Groundwater Remediation Wastewaters.

## 15.0 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 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.