



June 12, 2019

VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

Melanie A. Bachman
Executive Director
State of Connecticut
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

**Re: Commercial Operation Notification and Wastewater Permit Submittal
PSEG Power Connecticut LLC
Petition No. 1218 - Bridgeport Harbor Station Unit 5 Combined Cycle Project
1 Atlantic Street
City of Bridgeport, Fairfield County, Connecticut**

Dear Ms. Bachman:

Please be advised that PSEG Power Connecticut LLC (PSEG) has formally notified the Independent System Operator – New England (ISO-NE) that PSEG's Bridgeport Harbor Station Unit 5 (BHS5) is available for dispatch (i.e. is "Commercial for Operations") effective June 10, 2019, as more fully discussed below. Additionally, in accordance with Condition Nos. 3 and 4 of the July 21, 2016 Connecticut Siting Council (CSC) Decision and Order, PSEG is also notifying the CSC that BHS5 has received the final authorization from the Connecticut Department of Energy and Environmental Protection (CT DEEP) for the discharge of industrial wastewater.

On June 10, 2019, PSEG completed startup and commissioning testing of the BHS5 facility for operations using natural gas as fuel. On that date, PSEG notified ISO-NE that the plant is available for dispatch to the electric power grid for the generation of electricity at the rated capacity of the unit. Copies of the electronic notification to ISO-NE and the ISO-NE confirmation are attached as **Exhibit 1**. As previously communicated, commissioning on Ultra Low Sulfur Distillate (ULSD) fuel is scheduled for completion in December 2019.

Condition Nos. 3 and 4 of the CSC Decision and Order require submittal of local and state wastewater discharge permits, respectively. **Exhibit 2** provides a copy of the Temporary Authorization No. TA0100393 issued May 2, 2019 by CT DEEP, pursuant to Connecticut General Statutes (CGS) Section 22a-6k for the discharge of wastewater to the City of Bridgeport Water Pollution Control Authority (WPCA) West Side Publicly Owned Treatment Works (POTW). The Temporary Authorization authorized the discharge of wastewater to the WPCA facility until issuance of an individual Pretreatment Permit (among other conditions).

**Petition No. 1218 - Bridgeport Harbor Station Unit 5 Combined Cycle Project
Commercial Operation Notification and Wastewater Permit Submittal**

Subsequently, the CT DEEP issued individual Pretreatment Permit No. SP0002474 on May 24, 2019, effective June 1, 2019, pursuant to CGS Section 22a-430 authorizing the discharge of wastewater to the WPCA West Side POTW for a five year term. A copy of the Pretreatment Permit is provided in **Exhibit 3**.

The Temporary Authorization and the Pretreatment Permit were reviewed by the WPCA prior to being issued. PSEG also met with the CT DEEP permit review team and WPCA management on numerous occasions to review permit conditions. The Pretreatment Permit is the last local or state wastewater or air permit required for the operation of the BHS5 facility. PSEG will status Decision and Order Condition Nos. 3 and 4 as "complete" in the Second Quarter 2019 Progress Report No. 16, targeted to be issued on July 10, 2019.

As always, if you have any questions or require clarification, please contact me at 973-856-0066 or the Project Senior Technical Director / Regulatory Lead, Jeff Pantazes at 609-440-0236.

Very truly yours



David Hinchey
Manager – Environment Major Permits and Projects
PSEG Power LLC
Fossil - Environment, Health, and Safety

Exhibits

- 1 – Electronic Submittal of COD Notice to ISO-NE and Subsequent Confirmation
- 2 – CT DEEP Temporary Authorization No. TA0100393
- 3 – CT DEEP Individual Pretreatment Permit No. SP0002474

- C Michael Perrone – CSC (three copies and electronic copy)
 Harold Blinderman, Esq. (electronic copy)
 Leilani M. Holgado, Esq. (electronic copy)
 Michael Kondria, Esq. (electronic copy)
 Arthur Mantell (electronic copy)
 Karl Wintermeyer (electronic copy)
 Scott Matheson (electronic copy)
 Jeffrey Pantazes (electronic copy)
 Leonard Rodriguez, Esq. – United Illuminating Company (electronic copy)
 Thomas Gill – City of Bridgeport (electronic copy)

Petition No. 1218 - Bridgeport Harbor Station Unit 5 Combined Cycle Project Commercial Operation Notification and Wastewater Permit Submittal

Exhibit 1 – Electronic Submittal of COD Notice to ISO-NE and Subsequent Confirmation

Electronic Submittal:

YOUR REQUEST WAS SUBMITTED SUCCESSFULLY.

You'll hear back from us soon.

Case summary

Subject: Notice of COD

Description: Pursuant to Schedule 22 of the Open Access Transmission Tariff, and Appendix E of the Large Generator Interconnection Agreement, PSEG Energy Resources and Trade LLC hereby declares its Bridgeport Harbor Unit 5 facility (Asset ID 38206) Commercial for Operations for the Operating Day Monday June 10, 2019. If there are any questions or if additional information is needed, please contact me directly. thank you.

Case Number: 00026778

Confirmation:

[EXTERNAL] Generator Asset PSEG BRIDGEPORT HARBOR CCGT EX (38206) Effective 6/10/2019 Issue #26778



Abashina, Elena <Eabashina@iso-ne.com>
6/7/2019 4:44 PM

To: OLeary, Christopher D. (Mktg Function); Di Iorio, Michelle (Mktg Function); DeSousa, Chris (Mktg Function); Heaney, Kevin E (Mktg Function); Liu-McKenna, Phyllis (Mktg); Cimino, David M. (Mktg Function); Gordon, Joel S. (Mktg Function); Corash, Richard J. (Mktg Function) Cc: Asset Registration; NX12; RAI Technical Studies; NewGenCoord; Ballantine, Joseph

Email sent from outside of PSEG. Use caution before using links/attachments.

ISO-NE CONFIDENTIAL

Generator Asset PSEG BRIDGEPORT HARBOR CCGT EX (38206) - commercial operation date effective 6/10/2019. See CAMS for details.
Issue #26778 will now be closed.

Regards,

Elena Abashina
Associate Analyst | Asset Registration & New Generation
(413) 540-4247 (office)
eabashina@iso-ne.com

ISO New England Inc.
One Sullivan Road | Holyoke, MA 01040-2841
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**Petition No. 1218 - Bridgeport Harbor Station Unit 5 Combined Cycle Project
Commercial Operation Notification and Wastewater Permit Submittal**

Exhibit 2 – CT DEEP Temporary Authorization No. TA0100393



TEMPORARY AUTHORIZATION

- I. Pursuant to Connecticut General Statutes (C.G.S.) 22a-6k, a Temporary Authorization (Authorization) is hereby issued to:

PSEG Power Connecticut LLC
1 Atlantic Street
Bridgeport, CT 06604

to initiate, create, originate or maintain a discharge to the waters of the state at:

The City of Bridgeport West Side Publicly Owned Treatment Works (POTW) at:
Bridgeport Harbor Station, Unit 5 Combine Cycle Plant (BHS5)
1 Atlantic Street
Bridgeport, CT 06604

- II. This Authorization is specifically limited to discharges associated with start-up and commissioning wastewaters generated prior to commercial operation of BHS5.
- III. This Authorization shall become effective after written notice of intent to commence discharge is received by the Bureau of Materials Management and Compliance Assurance, and shall expire: 1) 90 days after the effective date; 2) when the requirements for coverage under a general permit issued pursuant to C.G.S. section 22a-430b have been satisfied; 3) upon issuance of an individual permit pursuant to C.G.S. 22a-430 as amended; 4) immediately upon notification of a tentative determination to deny a permit; or 5) when the discharge ceases; **whichever is sooner**.
- IV. The fee of \$1500.00 has been received for issuance of this Authorization.
- V. This Authorization has been issued based on the following submittals:
- A. Application No. 201905454 received April 24, 2019.

VI. A. **DEFINITIONS**

The definitions of terms used in this Authorization shall be the same as the definitions contained in C.G.S. section 22a-423, and section 22a-430-3(a) of the Regulations of Connecticut State Agencies.

Any person who, or municipality which initiates, creates, originates, or maintains a discharge for which an authorization is issued must comply with that authorization. If the source or activity generating the discharge for which an authorization is issued is owned by one person or municipality but is leased or in some other way the legal responsibility of another person or municipality (the discharger), the discharger is responsible for compliance with any authorization issued by the Commissioner.

B. **SPECIAL CONDITIONS**

- 1) Discharges shall be conducted as specified in Appendix 1 of this Temporary Authorization.
- 2) Monitoring shall be conducted as detailed in Appendix 2 of this Temporary Authorization.

In addition, monitoring shall be conducted as directed by authorized personnel of the City of Bridgeport West Side Publicly Owned Treatment Works (POTW).

3) **REPORTING REQUIREMENTS:**

Unless otherwise stated in this Authorization, within 45 days of completion of authorized activities, a copy of the results of monitoring conducted during the start-up and commissioning shall be submitted to:

Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, CT 06106-5027
Attention: Donald Gonyea

- 4) This Authorization shall be non-transferable.
- 5) The following additional terms and conditions shall be complied with:
 - (a) This Authorization is for the discharge of (i) pollutants in quantities and concentrations as specified in this Authorization; and (ii) any substances resulting from the processes or activities described in this Authorization in concentrations and quantities which the Commissioner determines cannot reasonably be expected to cause pollution. However, the Commissioner may seek an injunction or issue an order to prevent or abate pollution, and may seek criminal penalties against a person who willfully or with criminal negligence causes or threatens pollution.
 - (b) Discharge of any substance which is not from the processes or activities described in this Authorization shall be considered a violation of this Authorization unless it is authorized by an individual permit issued under Section 22a-430 of the General Statutes or a general permit issued under section 22a-430b of the General Statutes.
- 6) Within fifteen (15) days after the date the discharger becomes aware of a change in any information submitted to the Commissioner under any registration of this Authorization, or that any such information was inaccurate or misleading or that any relevant information was omitted, the discharger shall submit the correct or omitted information in writing to the Commissioner.
- 7) Nothing in this Authorization shall relieve the discharger of other obligations under applicable federal, state and local law.

- 8) Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Authorization by the discharger shall be signed by the discharger and by the individual or individuals responsible for actually preparing such document, each of whom shall certify in writing as follows: "I have personally examined and am familiar with the information submitted in this document and all attachments and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense."
- 9) Any false statement in any information submitted pursuant to this Authorization may be punishable as a criminal offense under:

Section 22a-438 of the General Statutes or, in accordance with Section 22a-6, under Section 53a-157 of the General Statutes.
- 10) The Commissioner reserves the right to make appropriate revisions to this Authorization in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be necessary to adequately protect human health and the environment.
- 11) The Commissioner may order summary suspension of this Authorization in accordance with Section 4-182 of the Connecticut General Statutes.

Entered as a Temporary Authorization of the Commissioner of Energy and Environmental Protection.

5/2/19
Date


Betsey Wingfield
Deputy Commissioner

Application No. 201905454
Authorization No. TA0100393

APPENDIX 1

PSEG Power Connecticut, LLC (PSEG) is currently in the start-up and commissioning phase of the Bridgeport Harbor Station Unit 5 Combined Cycle Plant (BHS5). PSEG is seeking a Temporary Authorization for the discharge of start-up and commissioning wastewaters generated prior to commercial operation. The Project will continue to discharge various flushing and hydrolazing wastewaters under the General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater (MISC General Permit). This application covers the Temporary Authorization for process wastewater discharges that are not authorized under the MISC General Permit.

Project Description

BHS5 will consist of a 485 MW dual fuel, single train combined-cycle power plant. The Project design incorporates an air-cooled condenser to minimize the Facility's operational water requirements and eliminate the need to use Bridgeport Harbor water for cooling. Aquarion Water Company, the local water utility, will supply the Facility's water requirements. Wastewater from BHS5 will be discharged to the Bridgeport Water Pollution Control Authority's (WPCA's) West Side Water Pollution Control Facility.

Wastewater System Description

Wastewater generated from start-up and commissioning activities will be directed to the on-site General Services Enclosure Sump, which discharges to a WPCA 60-inch sewer main in Ferry Access Road. This connection is approved under the City of Bridgeport WPCA Sewer Connection Permit (Permit No. 16029), issued on December 9, 2016. The location of this sewer connection is depicted on the mapping provided as Attachments A and B of Temporary Authorization Application No. 201905454. The location of the General Services Enclosure Sump is shown on the General Arrangement Drawings provided in Attachment A of Temporary Authorization Application No. 201905454.

The General Services Enclosure Sump is equipped with two 75 gpm capacity pumps, which discharge to an on-site force main. The pumps are controlled remotely in automatic or manual mode. In Automatic mode, the pumps are started and stopped based on sump level. The pumps will be automatically stopped, however, if any of the following conditions occur:

1. Low and Low-Low General Services Enclosure Sump level;
High-High or Low-Low pH;
High-High temperature; and/or
High-High total discharge flow.

Proposed Wastewater Discharges

This Temporary Authorization is limited to discharges of wastewater generated during the start-up and commissioning phase of the Project, prior to commercial operation. Table 1, below, provides a description of the anticipated wastewater discharges that will occur prior to commercial operation that are not covered by the MISC GP. As shown, the discharge will primarily consist of auxiliary cooling tower blowdown.

In the General Services Enclosure Sump, auxiliary cooling tower blowdown is combined with the following discharges:

- Treated effluent from three oil/water separators;
- Backwash water from multimedia sand filters, which are part of the facility's process makeup demineralization system;
- Maintenance drains from a cartridge filter used for internal recycling;
- Maintenance drains from the auxiliary cooling water pumps and associated filters; and,
- Floor drains in the leased demineralization system trailers (Conex containers).

Description of wastewater treatment.

BHS5 has an onsite treatment system, consisting of three oil/water separators as described in Attachment C of Temporary Authorization Application No. 201905454, and the plant has been designed to meet the effluent limitations set forth in the CT DEEP Draft Pretreatment Permit No. SP0002474 (See Attachment A). In addition, the wastewater discharged will ultimately be discharged to the City of Bridgeport WPCA sewer system where the wastewater will be treated in accordance with the WPCA water treatment plant discharge permits.

APPENDIX 1

Table 1

Summary of Anticipated Wastewater Discharges

Description of Discharge	Make-up Water (i.e., City water, Demin Water)	Chemical Additives	Approx. Volume of Wastewater Generated (gpd)	Schedule and Frequency	Discharge Location
Auxiliary Cooling Tower Blowdown	HRSB Blowdown Sump Discharge (Demin Water), Service Water, Mobile DI Demin Bed Rinse Water, reverse osmosis reject.	Phosphate, Ammonia, Amine, Sodium Hypochlorite, Sulfuric Acid, Anti-Scalant, Caustic, Sodium Bisulfate	40,000 gpd	Continuous	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)
Auxiliary Cooling Water Pump Drains	HRSB Blowdown Sump Discharge (Demin Water), Service Water, Mobile DI Demin Bed Rinse Water, reverse osmosis reject.	Phosphate, Ammonia, Amine, Sodium Hypochlorite, Sulfuric Acid, Anti-Scalant, Caustic, Sodium Bisulfite	<100 gpd	Active only during auxiliary cooling water pump maintenance operations.	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)
North Oil Water Separator (5WWD-OWS-0001)	Service Water, Air Conditioning Condensate	None	3600 gpd	Batch discharge, once per day	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)

Description of Discharge	Make-up Water (i.e., City water, Demin Water)	Chemical Additives	Approx. Volume of Wastewater Generated (gpd)	Schedule and Frequency	Discharge Location
South Oil Water Separator (5WWD-OWS-0002)	Service Water	None	~175 gpd	Batch discharge, once per day	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)
East Oil Water Separator (5WWD-OWS-0003)	Service Water	None	~1,000 gpd	Batch discharge, once per day	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)
Leased Demin Pretreatment System (Sand Filter Backwash)	Service Water	None	~1,000 gpd	Batch discharge once per day to General Services Sump	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)
Leased Demin Pretreatment System Floor Drains	Service Water	None	<100 gpd	N/A	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)
Cartridge Filter Skid Drain	HRSB Blowdown Sump Discharge (Demin Water)	Ammonia	<100 gpd	Active only during cartridge filter testing or maintenance operations.	General Services Enclosure Sump (Ultimately to the WPCA 60-inch main on Ferry Access Road)

APPENDIX 1
Attachment A
CT DEEP Draft Pretreatment Permit No. SP0002474



PRETREATMENT PERMIT

issued to

PSEG Power Connecticut LLC
1 Atlantic Street
Bridgeport, CT 06604

Location Address:

Bridgeport Harbor Station, Unit 5
1 Atlantic Street
Bridgeport, CT

Permit ID: SP0002474

Permit Effective Date:

Permit Expiration Date:

SECTION 1: GENERAL PROVISIONS

- (A) This permit is issued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.
- (B) PSEG Power Connecticut LLC, ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

- (a) Definitions
- (b) General
- (c) Inspection and Entry
- (d) Effect of a Permit
- (e) Duty
- (f) Proper Operation and Maintenance
- (g) Sludge Disposal
- (h) Duty to Mitigate
- (i) Facility Modifications; Notification
- (j) Monitoring, Records and Reporting Requirements
- (k) Bypass
- (l) Conditions Applicable to POTWs
- (m) Effluent Limitation Violations (Upsets)
- (n) Enforcement
- (o) Resource Conservation
- (p) Spill Prevention and Control
- (q) Instrumentation, Alarms, Flow Recorders
- (r) Equalization

Section 22a-430-4 Procedures and Criteria

- (a) Duty to Apply
- (b) Duty to Reapply
- (c) Application Requirements
- (d) Preliminary Review
- (e) Tentative Determination
- (f) Draft Permits, Fact Sheets
- (g) Public Notice, Notice of Hearing
- (h) Public Comments
- (i) Final Determination
- (j) Public Hearings

- (k) Submission of Plans and Specifications. Approval.
 - (l) Establishing Effluent Limitations and Conditions
 - (m) Case by Case Determinations
 - (n) Permit issuance or renewal
 - (o) Permit Transfer
 - (p) Permit revocation, denial or modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements for Metals and Cyanide
 - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.
- (H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the CGS).

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above the following definitions shall apply to this permit:

"----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

"Annual" in the context of a sampling frequency, means the sample must be collected in the month of **[TO BE DETERMINED BASED ON PERMIT EFFECTIVE DATE]**.

"Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l). Otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.

"Bimonthly" in the context of sampling frequency, means the sample must be collected once every two months in the months of **[TO BE DETERMINED BASED ON PERMIT EFFECTIVE DATE]**.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

"Daily Quantity" means the quantity of waste generated during an operating day.

"Grab Sample Average" means the arithmetic average of all grab sample analyses. Grab samples shall be collected at least: (1) for a continuous discharge of four or more hours in duration, once every four hours over a full operating day for as long as a discharge exists on that day (minimum of two grab samples per day); or

(2) for a batch discharge of less than four hours in duration, at least once per batch discharge over a full operating day for as long as a discharge exists on that day (minimum of two grab samples per day).

"Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l). Otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"mg/l" means milligrams per liter.

"NA" as a Monitoring Table abbreviation means "not applicable".

"ND" as a Monitoring Table abbreviation means "non-detectable".

"NR" as a Monitoring Table abbreviation means "not required".

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of March, June, September, and December.

"Range During Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum of all values recorded as a result of analyzing each grab sample of; 1) a Composite Sample, or 2) a Grab Sample Average. For those permittees with continuous monitoring and recording pH meters, Range During Sampling shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"S.U." means Standard Units.

"Semi-Annually" in the context of a sampling frequency, means the sample must be collected in the months of June and December.

"Twice per Month" when used as a sample frequency shall mean two samples per calendar month collected no less than twelve (12) days apart.

SECTION 3: COMMISSIONER'S DETERMINATION

- (A) The Commissioner has made a final determination and found that the system installed for the treatment of the discharge, will protect the waters of the state from pollution. The Commissioner's determination is based on Application No. 201614170 for permit issuance received on October 31, 2016 and the administrative record established in the processing of that application.
- (B) From **PERMIT ISSUANCE DATE** until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002474, issued by the Commissioner to the Permittee on based on Application No. 201614170, received by the Department on October 31, 2016 and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0002474.
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the CGS or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or CGS or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The discharge shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A									
Discharge Serial Number: DSN 201-1				Monitoring Location: 1					
Wastewater Description: Auxiliary cooling tower blowdown, potentially oily wastewater discharged through oil/water separators and water treatment sand filter backwash									
Monitoring Location Description: Discharge line from General Services Sump									
Discharge is to: The City of Bridgeport West Side Publicly Owned Treatment Works ("POTW")									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING					INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	
Cadmium, Total	mg/l	0.1	0.2	Weekly	Daily Composite	0.3	NR	Grab	
Chromium, Total	mg/l	0.2	0.2	Weekly	Daily Composite	0.2	NR	Grab	
Copper, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab	
Flow Rate (Average Daily) ¹	gpd	50,000	NA	Daily	Daily Flow	NA	NR	NA	
Flow, Maximum during 24 hr period ¹	gpd	NA	75,000	Daily	Daily Flow	NA	NR	NA	
Flow, Day of Sampling	gpd	NA	75,000	Weekly	Daily Flow	NA	NR	NA	
Lead, Total	mg/l	0.1	0.5	Weekly	Daily Composite	0.75	NR	Grab	
Magnesium, Total	mg/l	100.0	200.0	Weekly	Daily Composite	300.0	NR	Grab	
Mercury, Total	mg/l	0.01	0.02	Weekly	Daily Composite	0.03	NR	Grab	
Nickel, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab	
Oil Petroleum, Total Recoverable	mg/l	NA	25.0	Weekly	Grab Sample Average	50.0	NR	Grab	
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-11.0	Weekly	RDS	
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous/Monthly	Continuous	
pH, Maximum	S.U.	NA	NA	NR	NA	11.0	Continuous/Monthly	Continuous	
Silver, Total	mg/l	0.1	0.5	Weekly	Daily Composite	0.75	NR	Grab	
Zinc, Total	mg/l	1.0	1.0	Weekly	Daily Composite	1.0	NR	Grab	
Footnotes:									
¹ For this parameter the Permittee shall maintain at the facility a record of the total daily flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each sampling month.									
² The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequently, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.									

Table B									
Discharge Serial Number: Monitoring Location 201-A					Monitoring Location: 3				
Wastewater Description: Source water prior to the addition of water conditioning additives or chemicals									
Monitoring Location Description: Monitoring Location prior to the addition of water conditioning additives or chemicals									
Discharge is to: Water Treatment System									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Grab
Priority Pollutants ¹	µg/l	NA	NA	NR	NA	----	Bimonthly		Grab
Footnotes: ¹ For this parameter the Permittee shall report the results of the analysis for each of the 126 priority pollutants described in Appendix A to 40 CFR 423 with the discharge monitoring report for the respective sampling month. Analyses for priority pollutants shall be based on a detection limit not greater than 10 micrograms per liter (µg/l), using sufficiently sensitive methods, for each of the 126 priority pollutants by analytical methods in 40 CFR 136 (Note: for asbestos, the result shall be reported as number of fibers/liter). ² The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequently, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.									

Table C									
Discharge Serial Number: DSN 201-B					Monitoring Location: IM				
Wastewater Description: Auxiliary Cooling Tower Blowdown									
Monitoring Location Description: Internal Monitoring Location prior to commingling with other discharges to the General Services Sump [TBD]									
Discharge is to: General Services Sump									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ¹	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ¹	Sample Type or Measurement to be Reported	
Chromium, Total	mg/l	0.2	0.2	Bimonthly	Daily Composite	0.2	NR	Grab	
Zinc, Total	mg/l	1.0	1.0	Bimonthly	Daily Composite	1.0	NR	Grab	
Priority Pollutants, except for Chromium and Zinc, as noted in this Table for Auxiliary Cooling Tower Blowdown only. ²	µg/l	NA	NA	NR	NA	10 ²	Bimonthly	Grab	

Footnotes:

¹ The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequently, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.

² For this parameter the Permittee shall report the results of the analysis for each of the 126 priority pollutants described in Appendix A to 40 CFR 423 with the discharge monitoring report for the respective sampling month. Analyses for priority pollutants shall be based on a detection limit not greater than 10 micrograms per liter ($\mu\text{g/l}$), using sufficiently sensitive methods, for each priority pollutant by analytical methods in 40 CFR 136 (Note: for asbestos, the result shall be reported as number of fibers/liter). Compliance shall be determined in accordance with Section 4(D) of this permit.

- (B) All samples shall be comprised of only those wastewaters described in this schedule. Therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by the Department of Energy and Environmental Protection personnel, the Permittee, or other parties.
- (D) In accordance with Section 4, Table C of this permit, except for total chromium and total zinc, there shall be no discharge from cooling tower blowdown, in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) using sufficiently sensitive methods, of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423 from the use of additives or conditioning chemicals used in the facility's water conditioning program, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to the cooling tower. Compliance with this requirement shall be determined based on no net increase in detectable amounts, using sufficiently sensitive methods, of any of the priority pollutants reported in Section 4, Table C of this permit when compared to the amount of any priority pollutant reported in Section 4, Table B of this permit after such reported amount is multiplied by one of the following applicable concentration factors: (1) when the facility is operating using natural gas as the fuel source, the concentration factor shall be 13.25; (2) when the facility is operating using oil as the fuel source, the concentration factor shall be 26.44. In instances where the reported level of such priority pollutant pursuant to Section 4, Table B of this permit is determined by the laboratory to be non-detectable, the reporting limit shall be used when multiplying the applicable concentration factor. For asbestos, the result shall be reported as number of fibers/liter. For total chromium and total zinc, there shall be no discharge of such priority pollutants in the discharge from cooling tower blowdown beyond the limits described in Section 4, Table C of this permit using sufficiently sensitive methods.
- (E) On or after two (2) years after the effective date of this Permit, the Permittee may request a minor permit modification pursuant to RCSA Section 22a-430-4(p)(5)(B)(ii) to reduce the monitoring frequency for priority pollutants listed in Appendix A of 40 CFR 423, as required by Table B and Table C of this Permit, to not less than annually. Any such request may be made provided that the Permittee submits for the Commissioner's review and written approval a demonstration that the use of such additives or conditioning chemicals, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to cooling towers, will not result in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter), using sufficiently sensitive methods, of such priority pollutants in the discharge of cooling tower blowdown. Such demonstration shall be made with supporting engineering-based mass balance calculations, based on the discharge monitoring information required pursuant to this permit and the certified analytical contents of each of the additives and conditioning chemicals used in the facility's water conditioning program. The information used in making the demonstration, including supporting calculations, shall be maintained at the facility in accordance with RCSA Section 22a-430-3(j)(9).
- (F) The Permittee shall include with each Discharge Monitoring Report (DMR) a statement signed by an authorized representative of the Permittee, using the form provided in Attachment A to this permit, certifying to the following:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standards for New Sources at Title 40 CFR 423.17 Steam Electric Power Generating Point Source Category, I hereby certify to the best of my knowledge and belief, based on my review of all available information including, but not limited to: (1) the discharge monitoring information required pursuant to Section 4 Table B and Table C, and the terms and conditions of Section 4(D) of Permit No. SP0002474, and/or (2) the demonstration approved pursuant to Section 4(E) of Permit No. SP0002474, that no additives or conditioning chemicals used in the facility's water conditioning program, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to cooling towers, result in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423, using sufficiently sensitive methods, in the discharge of cooling tower blowdown since filing of the last periodic report under 40 CFR 403.12(e)(i).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- (G) There shall be no discharge of polychlorinated biphenyl compounds.

- (H) There shall be no discharge of chemical metal cleaning wastes, wastewaters or rinse waters to the sanitary sewer. Wastes, wastewaters and rinse waters from chemical metal cleaning activities shall be collected and hauled offsite by an appropriately licensed transporter to an appropriately licensed treatment, storage or disposal facility.

SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for total recoverable metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Water Permitting and Enforcement Division at the address below. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at the address below by the last day of the month following the month in which samples are taken.

Water Permitting and Enforcement Division (Attn: DMR Processing)
Bureau of Materials Management and Compliance Assurance
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

- (D) If this permit requires monitoring of a discharge on a calendar basis (i.e., monthly, quarterly) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.

(E) NetDMR Reporting Requirements

1. Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection. Unless otherwise approved in writing by the Commissioner, no later than one-hundred and eighty (180) days after the issuance of this permit, the Permittee shall begin reporting electronically using NetDMR. Specific requirements regarding subscription to NetDMR and submittal of data and reports in hard copy form and for submittal using NetDMR are described below:

a. Submittal of *NetDMR Subscriber Agreement*

On or before fifteen (15) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's discharge monitoring reports ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of DMR information. Information on NetDMR is available on the Department's website at www.ct.gov/deep/netdmr. On or before ninety (90) days after issuance of this permit the Permittee shall submit a signed and notarized copy of the *Connecticut DEEP NetDMR Subscriber Agreement* to the Department.

b. Submittal of Reports Using NetDMR

Unless otherwise approved by the Commissioner, on or before one-hundred and eighty (180) days after issuance of this permit, the Permittee and/or the Signatory Authority shall begin electronically submitting

DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement of Section 5(C) of this permit.

DMRs shall be submitted electronically to the Department no later than the thirtieth (30th) day of the month following the completed reporting period. All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs or other reports to the Department. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR. NetDMR is accessed from: <http://www.epa.gov/netdmr>.

c. Submittal of NetDMR Opt-Out Requests

If the Permittee is able to demonstrate a reasonable basis, such as technical or administrative infeasibility, that precludes the use of NetDMR for electronically submitting DMRs and reports, the Commissioner may approve the submission of DMRs and other required reports in hard copy form ("opt-out request"). Opt-out requests must be submitted in writing to the Department for written approval on or before fifteen (15) days prior to the date a Permittee would be required under this permit to begin filing DMRs and other reports using NetDMR. This demonstration shall be valid for twelve (12) months from the date of the Department's approval and shall thereupon expire. At such time, DMRs and reports shall be submitted electronically to the Department using NetDMR unless the Permittee submits a renewed opt-out request and such request is approved by the Department.

All opt-out requests and requests for the NetDMR subscriber form should be sent to the following address or by email at decp.netdmr@ct.gov:

Attn: NetDMR Coordinator
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

- (F) DMRs submitted to the Department with Priority Pollutant monitoring data shall include as an electronic attachment in NetDMR the respective analytical results, reporting limits and the analytical method numbers performed pursuant to 40 CFR 436 for each of the 126 priority pollutants listed in Appendix A of 40 CFR 423, and shall include the supporting calculated values to demonstrate compliance pursuant to Section 4 of this Permit.
- (G) Copies of all DMRs shall be submitted concurrently to the Bridgeport West Side Publicly Owned Treatment Works ("POTW").

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

- (A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Water Permitting and Enforcement Division (Attn: DMR Processing) within thirty (30) days of the date of the analytical laboratory report identifying the exceedance.
- (B) The Permittee shall immediately notify the Water Permitting and Enforcement Division and the Bridgeport West Side POTW of all discharges that could cause problems to the POTW, including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

SECTION 7: COMPLIANCE SCHEDULE

- (A) On or before fifteen (15) days after the Permittee provides written notification of commercial operation of the facility to ISO New England, the Permittee shall submit a copy of such notification to the Commissioner and shall conduct the analyses for wastewater discharged through Discharge Serial Number ("DSN") 201-1 as required pursuant to Section 7(B) of this Permit.
- (B) On or before forty-five (45) days after the Permittee provides written notification of commercial operation of the facility to ISO New England, the Permittee shall submit for the Commissioner's review a completed "Attachment O, Part B" form from the Department's *Permit Application for Wastewater Discharges from Manufacturing, Commercial, and Other Activities*. Specifically, analyses for wastewater discharged through Discharge Serial Number ("DSN") 201-1 shall be conducted for the following: all parameters listed in Table 1; all toxic metals, cyanides, phenols, volatiles, GS/MS fraction acid compounds in Table 2; any base neutral compounds or pesticides in Table 2 and any parameters in Tables 3 and 4 that are known or suspected to be present in the discharge. In addition, Tables 5, 6 and 7 of "Attachment O, Part B" shall be completed and submitted. The Permittee shall also submit the results of analyses for the 126 priority pollutants listed in Appendix A of 40 CFR 423. All samples shall be collected and analyzed using the sufficiently sensitive methods specified in 40 CFR Part 136.
- (C) Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit, unless otherwise specified in writing by the Commissioner, shall be directed to:

Kim E. Hudak, P.E., Assistant Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

SECTION 8: COMPLIANCE CONDITIONS

In accordance with 40 CFR 403.8(f)(2)(viii), the Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve (12) months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee that is a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six percent (66%) or more of all measurements taken for the same pollutant parameter during a six (6) month period exceed (by any magnitude) the average monthly, maximum daily, or maximum instantaneous limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period equal or exceed the average monthly, maximum daily, or maximum instantaneous limit(s) multiplied by 1.4 for BOD, TSS, fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction, or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **Best Management Practices ("BMPs"):** Any other violation or group of violations, which may include a violation of BMPs,

which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

DRAFT

Robert E. Kaliszewski
Deputy Commissioner
Department of Energy and Environmental Protection

REK/MVM/PMP

cc: City of Bridgeport West Side POTW

ATTACHMENT A
(To be attached to each Discharge Monitoring Report)

“Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standards for New Sources at Title 40 CFR 423.17 Steam Electric Power Generating Point Source Category, I hereby certify to the best of my knowledge and belief, based on my review of all available information including, but not limited to: (1) the discharge monitoring information required pursuant to Section 4 Table B and Table C, and the terms and conditions of Section 4(D) of Permit No. SP0002474, and/or (2) the demonstration approved pursuant to Section 4(E) of Permit No. SP0002474, that no additives or conditioning chemicals used in the facility’s water conditioning program, including but not limited to additives or conditioning chemicals used in the facility’s cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to cooling towers, result in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423, using sufficiently sensitive methods, in the discharge of cooling tower blowdown since filing of the last periodic report under 40 CFR 403.12(e)(i).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Authorized Representative: _____ Title: _____
(PRINT NAME) (PRINT TITLE)

Signature: _____ Date: _____

APPENDIX 2

The following Monitoring Plan has been designed in conformance with the monitoring requirements set forth in the CT DEEP Draft Pretreatment Permit (Permit No. SP0002474). Monthly compliance sampling will be performed for each category of waste stream generated and in accordance with the Draft permit. As such, one (1) grab sample will be collected each month, as follows, pursuant to the Draft permit requirements:

Monitoring Location 1 – discharge from the General Services Enclosure Sump (in accordance with Table A of the Draft Permit)

Monitoring Location 3 - source water prior to the addition of water conditioning additives (in accordance with Table B of the Draft Permit)

Monitoring Location IM – Auxiliary Cooling Tower Blowdown prior to comingling with other discharges to the General Services Enclosure Sump (in accordance with Table C of the Draft Permit)

The pH and temperature will be monitored on a daily basis via representative grab sampling techniques for each day of discharge. Analysis will be performed on-site using a pH meter calibrated in accordance with standard operating procedures. Results will be recorded for each day of discharge. The temperature of the wastewater shall not exceed 150 °F, in accordance with the City of Bridgeport Ordinance limit.

The total daily discharge flow to the sewer will be monitored using one or more totalizing flow meter(s). The total daily discharge flow to the sewer will be recorded for each day of discharge.

The tables below reflect the specific parameters to be analyzed for and the associated limit for each sampling location, which is based on Tables A, B, and C of the Draft Permit.

Monitoring Location 1 (discharge from the General Services Enclosure Sump)		
Parameter	Units	Limit
Cadmium, Total	mg/L	0.3
Chromium, Total	mg/L	0.2
Copper, Total	mg/L	3.0
Total Daily Flow	gpd	50,000
Lead, Total	mg/L	0.75
Magnesium, Total	mg/L	300.0
Mercury, Total	mg/L	0.03
Nickel, Total	mg/L	3.0
Oil Petroleum, Total Recoverable	mg/L	50.0
pH	S.U.	6 to 11
Silver, Total	mg/L	0.75
Zinc, Total	mg/L	1.0

Monitoring Location 3 (source water prior to the addition of water conditioning additives)		
Parameter	Units	Limit
Priority Pollutants	µg/l	N/A

Monitoring Location IM (Auxiliary Cooling Tower Blowdown prior to comingling with other discharges to the General Services Enclosure Sump)		
Parameter	Units	Limit
Priority Pollutants	µg/l	10 ¹
Chromium, Total	mg/L	0.2
Zinc, Total	mg/L	1.0

¹ For this parameter PSEG shall report the results of the analysis for each of the 126 priority pollutants described in Appendix A to 40 CFR 423 with the discharge monitoring report for the respective sampling month. Analyses for priority pollutants shall be based on a detection limit not greater than 10 micrograms per liter (µg/l), using sufficiently sensitive methods, for each priority pollutant by analytical methods in 40 CFR 136 (Note: for asbestos, the result shall be reported as number of fibers/liter).

Note: In accordance with Section 4, Table C of the Draft Permit, except for total chromium and total zinc, there shall be no discharge from cooling tower blowdown, in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) using sufficiently sensitive methods, of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423 from the use of additives or conditioning chemicals used in the facility's water conditioning program, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to the cooling tower. Compliance with this requirement shall be determined based on no net increase in detectable amounts, using sufficiently sensitive methods, of any of the priority pollutants reported in Section 4, Table C of the Draft Permit when compared to the amount of any priority pollutant reported in Section 4, Table B of the Draft Permit after such reported amount is multiplied by one of the following applicable concentration factors: (1) when the facility is operating using natural gas as the fuel source, the concentration factor shall be 13.25; (2) when the facility is operating using oil as the fuel source, the concentration factor shall be 26.44. In instances where the reported level of such priority pollutant pursuant to Section 4, Table B of this permit is determined by the laboratory to be non-detectable, the reporting limit shall be used when multiplying the applicable concentration factor. For asbestos, the result shall be reported as number of fibers/liter. For total chromium and total zinc, there shall be no discharge of such priority pollutants in the discharge from cooling tower blowdown beyond the limits described in Section 4, Table C of the Draft Permit using sufficiently sensitive methods.

AUTHORIZATION

INITIAL SCREENING OR SUBSEQUENT MONITORING RESULTS

(Attach copy of laboratory results)

MAIL TO: Attention: **DMR Processing** (for subsequent monitoring)
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

APPLICATION NO. 201905454 AUTHORIZATION NO. TA0100393

NAME OF DISCHARGER: PSEG Power Connecticut LLC
SITE NAME & ADDRESS Bridgeport Harbor Station, Unit 5 - 1 Atlantic Street -
Bridgeport, CT 06604

DISCHARGE LOCATION: Bridgeport West Side Publicly Owned Treatment Works
(Name of waterbody or sanitary sewer)

WATER QUALITY CLASSIFICATION:

Sample Date: _____

Number of hours of discharge for each day of sample collection: _____

Check one: INITIAL SCREENING OF RAW WATER _____ SUBSEQUENT MONITORING _____

Reporting of the following parameters is required. Requirements for reporting a specific parameter are indicated on the Authorization form. For initial screening, report additional parameters that are known or **suspected** to be present. For subsequent monitoring, if **any** parameters exceed limits specified in this Authorization, report the results and place FAIL in the space provided, otherwise place PASS in the space provided.

POLLUTANT
PARAMETER

RESULTS
(w/units)

LIMITS

See Authorization

ALL PARAMETERS SPECIFIED ABOVE (PASS OR FAIL) _____

AUTHORIZATION

INITIAL SCREENING OR SUBSEQUENT MONITORING RESULTS

(Attach copy of laboratory results)

I certify that I have personally examined and am familiar with the information submitted in this document and all attachments and certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief, and I understand that any false statement made in this document or its attachments may be punishable as a criminal offense. I certify that all discharge limitations of this authorization have been met, otherwise if a violation of any of the discharge limits occurs, **the discharge will be stopped immediately** and written notification must be sent to the DEEP/BMMCA/CPU within twenty-four hours. In this situation, the discharge shall not be re-started without prior approval of the Commissioner. I also certify that I have correctly completed the PASS/FAIL space provided, otherwise a penalty may be imposed.

Date

Name:
Title:

At the time of **Final Discontinuance** of the discharge for which this Authorization was issued, please indicate:

Date of termination of discharge _____

Has an application for an individual permit or has a registration for a general permit been submitted for this discharge?

Date of submission _____

YOU MUST SUBMIT THE ABOVE INFORMATION AT THE TIME OF FINAL DISCONTINUANCE OF THE DISCHARGE, OTHERWISE YOU WILL RECEIVE A NOTICE OF VIOLATION FOR MISSING DISCHARGE MONITORING (DMRs).

INTERNAL
SITE INFORMATION FORM

FACILITY ID. 059-012 APPLICATION NO. 201905454 AUTHORIZATION NO. TA0100393

ISSUANCE DATE _____ EXPIRATION DATE _____

MUNICIPAL _____

Pretreatment _____xx_____ POINT SOURCE

FEE \$1500.00 paid

SITE NAME: Bridgeport Harbor Station, Unit 5

SITE ADDRESS: 1 Atlantic Street - Bridgeport, CT 06604

SITE OWNER: same

OWNER ADDRESS

DISCHARGER NAME: PSEG Power Connecticut LLC

DISCHARGER ADDRESS: 1 Atlantic Street
Bridgeport, CT 06604

DISCHARGE NO. 001 MONITOR LOCATION

DESCRIPTION discharge from the combined cycle generating facility at elevated temperature and delta T

DISCHARGE POINT Bridgeport West Side Publicly Owned Treatment Works (BASIN
CODE 2000)

PRESENT/FUTURE WATER QUALITY STANDARD _____ NA

MAXIMUM DAILY FLOW _____ 50,000 gallons per day

MONITORING LOCATION _____ DSN 001-1

MONITORING FREQUENCY CODE: **CIRCLE ONE**

See authorization

POLLUTANT
PARAMETER

RESULTS
(w/units)

LIMITS

See Authorization

ENGINEER/ANALYST: Donald Gonyea 3827

**Petition No. 1218 - Bridgeport Harbor Station Unit 5 Combined Cycle Project
Commercial Operation Notification and Wastewater Permit Submittal**

Exhibit 3 – CT DEEP Individual Pretreatment Permit No. SP0002474

PRETREATMENT PERMIT

issued to

PSEG Power Connecticut LLC
1 Atlantic Street
Bridgeport, CT 06604

Location Address:

Bridgeport Harbor Station, Unit 5
1 Atlantic Street
Bridgeport, CT

Permit ID: SP0002474

Permit Effective Date: June 1, 2019

Permit Expiration Date: May 31, 2024

SECTION 1: GENERAL PROVISIONS

- (A) This permit is issued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.
- (B) PSEG Power Connecticut LLC, ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

- (a) Definitions
- (b) General
- (c) Inspection and Entry
- (d) Effect of a Permit
- (e) Duty
- (f) Proper Operation and Maintenance
- (g) Sludge Disposal
- (h) Duty to Mitigate
- (i) Facility Modifications; Notification
- (j) Monitoring, Records and Reporting Requirements
- (k) Bypass
- (l) Conditions Applicable to POTWs
- (m) Effluent Limitation Violations (Upsets)
- (n) Enforcement
- (o) Resource Conservation
- (p) Spill Prevention and Control
- (q) Instrumentation, Alarms, Flow Recorders
- (r) Equalization

Section 22a-430-4 Procedures and Criteria

- (a) Duty to Apply
- (b) Duty to Reapply
- (c) Application Requirements
- (d) Preliminary Review
- (e) Tentative Determination
- (f) Draft Permits, Fact Sheets
- (g) Public Notice, Notice of Hearing
- (h) Public Comments
- (i) Final Determination
- (j) Public Hearings

- (k) Submission of Plans and Specifications. Approval.
 - (l) Establishing Effluent Limitations and Conditions
 - (m) Case by Case Determinations
 - (n) Permit issuance or renewal
 - (o) Permit Transfer
 - (p) Permit revocation, denial or modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements for Metals and Cyanide
 - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.
- (H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the CGS).

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above the following definitions shall apply to this permit:

"----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("DMR").

"Annual" in the context of a sampling frequency, means the sample must be collected in the month of June.

"Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l). Otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.

"Bimonthly" in the context of sampling frequency, means the sample must be collected once every two months in the months of February, April, June, August, October and December.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

"Daily Quantity" means the quantity of waste generated during an operating day.

"Grab Sample Average" means the arithmetic average of all grab sample analyses. Grab samples shall be collected at least: (1) for a continuous discharge of four or more hours in duration, once every four hours over a full operating day for as long as a discharge exists on that day (minimum of two grab samples per day); or (2) for a batch discharge of less than four hours in duration, at least once per batch discharge over a full

operating day for as long as a discharge exists on that day (minimum of two grab samples per day).

"Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l). Otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"mg/l" means milligrams per liter.

"NA" as a Monitoring Table abbreviation means "not applicable".

"ND" as a Monitoring Table abbreviation means "non-detectable".

"NR" as a Monitoring Table abbreviation means "not required".

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of March, June, September, and December.

"Range During Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum of all values recorded as a result of analyzing each grab sample of; 1) a Composite Sample, or 2) a Grab Sample Average. For those permittees with continuous monitoring and recording pH meters, Range During Sampling shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"S.U." means Standard Units.

"Semi-Annually" in the context of a sampling frequency, means the sample must be collected in the months of June and December.

"Twice per Month" when used as a sample frequency shall mean two samples per calendar month collected no less than twelve (12) days apart.

SECTION 3: COMMISSIONER'S DETERMINATION

- (A) The Commissioner has made a final determination and found that the system installed for the treatment of the discharge, will protect the waters of the state from pollution. The Commissioner's determination is based on Application No. 201614170 for permit issuance received on October 31, 2016 and the administrative record established in the processing of that application.
- (B) From June 1, 2019 until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002474, issued by the Commissioner to the Permittee on based on Application No. 201614170, received by the Department on October 31, 2016 and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0002474.
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the CGS or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or CGS or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The discharge shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A									
Discharge Serial Number: DSN 201-1				Monitoring Location: 1					
Wastewater Description: Auxiliary cooling tower blowdown, potentially oily wastewater discharged through oil/water separators and water treatment sand filter backwash									
Monitoring Location Description: Discharge line from General Services Sump									
Discharge is to: The City of Bridgeport West Side Publicly Owned Treatment Works ("POTW")									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	
Cadmium, Total	mg/l	0.1	0.2	Weekly	Daily Composite	0.3	NR	Grab	
Chromium, Total	mg/l	0.2	0.2	Weekly	Daily Composite	0.2	NR	Grab	
Copper, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab	
Flow Rate (Average Daily) ¹	gpd	50,000	NA	Daily	Daily Flow	NA	NR	NA	
Flow, Maximum during 24 hr period ¹	gpd	NA	75,000	Daily	Daily Flow	NA	NR	NA	
Flow, Day of Sampling	gpd	NA	75,000	Weekly	Daily Flow	NA	NR	NA	
Lead, Total	mg/l	0.1	0.5	Weekly	Daily Composite	0.75	NR	Grab	
Magnesium, Total	mg/l	100.0	200.0	Weekly	Daily Composite	300.0	NR	Grab	
Mercury, Total	mg/l	0.01	0.02	Weekly	Daily Composite	0.03	NR	Grab	
Nickel, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab	
Oil Petroleum, Total Recoverable	mg/l	NA	25.0	Weekly	Grab Sample Average	50.0	NR	Grab	
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-11.0	Weekly	RDS	
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous/Monthly	Continuous	
pH, Maximum	S.U.	NA	NA	NR	NA	11.0	Continuous/Monthly	Continuous	
Silver, Total	mg/l	0.1	0.5	Weekly	Daily Composite	0.75	NR	Grab	
Zinc, Total	mg/l	1.0	1.0	Weekly	Daily Composite	1.0	NR	Grab	
Footnotes:									
¹ For this parameter the Permittee shall maintain at the facility a record of the total daily flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each sampling month.									
² The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequently, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.									

Table B							
Discharge Serial Number: Monitoring Location 201-A				Monitoring Location: 3			
Wastewater Description: Source water prior to the addition of water conditioning additives or chemicals							
Monitoring Location Description: Monitoring Location prior to the addition of water conditioning additives or chemicals							
Discharge is to: Water Treatment System							
PARAMETER	UNITS	FLOW/TIME BASED MONITORING			INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ²
Priority Pollutants ¹	µg/l	NA	NA	NR	NA	Bimonthly	Grab
Footnotes:							
1For this parameter the Permittee shall report the results of the analysis for each of the 126 priority pollutants described in Appendix A to 40 CFR 423 with the discharge monitoring report for the respective sampling month. Analyses for priority pollutants shall be based on a detection limit not greater than 10 micrograms per liter (µg/l), using sufficiently sensitive methods, for each of the 126 priority pollutants by analytical methods in 40 CFR 136 (Note: for asbestos, the result shall be reported as number of fibers/liter).							
2 The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequently, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.							

Table C								
Discharge Serial Number: DSN 201-B			Monitoring Location: IM					
Wastewater Description: Auxiliary Cooling Tower Blowdown								
Monitoring Location Description: Auxiliary cooling tower blowdown discharge line prior to discharging to the General Services Sump and commingling with other discharges								
Discharge is to: General Services Sump								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING			INSTANTANEOUS MONITORING			
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ¹	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ¹	Sample Type or Measurement to be Reported
Chromium, Total	mg/l	0.2	0.2	Bimonthly	Daily Composite	0.2	NR	Grab
Zinc, Total	mg/l	1.0	1.0	Bimonthly	Daily Composite	1.0	NR	Grab
Priority Pollutants, except for Chromium and Zinc, as noted in this Table for Auxiliary Cooling Tower Blowdown only. ²	µg/l	NA	NA	NR	NA	10 ²	Bimonthly	Grab

Footnotes:

¹ The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequently, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.

² For this parameter the Permittee shall report the results of the analysis for each of the 126 priority pollutants described in Appendix A to 40 CFR 423 with the discharge monitoring report for the respective sampling month. Analyses for priority pollutants shall be based on a detection limit not greater than 10 micrograms per liter ($\mu\text{g/l}$), using sufficiently sensitive methods, for each priority pollutant by analytical methods in 40 CFR 136 (Note: for asbestos, the result shall be reported as number of fibers/liter). Compliance shall be determined in accordance with Section 4(D) of this permit.

- (B) All samples shall be comprised of only those wastewaters described in this schedule. Therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by the Department of Energy and Environmental Protection personnel, the Permittee, or other parties.
- (D) In accordance with Section 4, Table C of this permit, except for total chromium and total zinc, there shall be no discharge from cooling tower blowdown, in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) using sufficiently sensitive methods, of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423 from the use of additives or conditioning chemicals used in the facility's water conditioning program, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to the cooling tower. Compliance with this requirement shall be determined based on no net increase in detectable amounts, using sufficiently sensitive methods, of any of the priority pollutants reported in Section 4, Table C of this permit when compared to the amount of any priority pollutant reported in Section 4, Table B of this permit after such reported amount is multiplied by one of the following applicable concentration factors: (1) when the facility is operating using natural gas as the fuel source, the concentration factor shall be 13.25; (2) when the facility is operating using oil as the fuel source, the concentration factor shall be 26.44. In instances where the reported level of such priority pollutant pursuant to Section 4, Table B of this permit is determined by the laboratory to be non-detectable, the reporting limit shall be used when multiplying the applicable concentration factor. For asbestos, the result shall be reported as number of fibers/liter. For total chromium and total zinc, there shall be no discharge of such priority pollutants in the discharge from cooling tower blowdown beyond the limits described in Section 4, Table C of this permit using sufficiently sensitive methods.
- (E) On or after two (2) years after the effective date of this Permit, the Permittee may request a minor permit modification pursuant to RCSA Section 22a-430-4(p)(5)(B)(ii) to reduce the monitoring frequency for priority pollutants listed in Appendix A of 40 CFR 423, as required by Table B and Table C of this Permit, to not less than annually. Any such request may be made provided that the Permittee submits for the Commissioner's review and written approval a demonstration that the use of such additives or conditioning chemicals, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to cooling towers, will not result in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter), using sufficiently sensitive methods, of such priority pollutants in the discharge of cooling tower blowdown. Such demonstration shall be made with supporting engineering-based mass balance calculations, based on the discharge monitoring information required pursuant to this permit and the certified analytical contents of each of the additives and conditioning chemicals used in the facility's water conditioning program. The information used in making the demonstration, including supporting calculations, shall be maintained at the facility in accordance with RCSA Section 22a-430-3(j)(9).
- (F) The Permittee shall include with each Discharge Monitoring Report (DMR) a statement signed by an authorized representative of the Permittee, using the form provided in Attachment A to this permit, certifying to the following:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standards for New Sources at Title 40 CFR 423.17 Steam Electric Power Generating Point Source Category, I hereby certify to the best of my knowledge and belief, based on my review of all available information including, but not limited to: (1) the discharge monitoring information required pursuant to Section 4 Table B and Table C, and the terms and conditions of Section 4(D) of Permit No. SP0002474, and/or (2) the demonstration approved pursuant to Section 4(E) of Permit No. SP0002474, that no additives or conditioning chemicals used in the facility's water conditioning program, including but not limited to additives or conditioning chemicals used in the facility's cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to cooling towers, result in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423, using sufficiently sensitive methods, in the discharge of cooling tower blowdown since filing of the last periodic report under 40 CFR 403.12(e)(i).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- (G) There shall be no discharge of polychlorinated biphenyl compounds.

- (H) There shall be no discharge of chemical metal cleaning wastes, wastewaters or rinse waters to the sanitary sewer. Wastes, wastewaters and rinse waters from chemical metal cleaning activities shall be collected and hauled offsite by an appropriately licensed transporter to an appropriately licensed treatment, storage or disposal facility.

SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for total recoverable metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Water Permitting and Enforcement Division at the address below. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at the address below by the last day of the month following the month in which samples are taken.

Water Permitting and Enforcement Division (Attn: DMR Processing)
Bureau of Materials Management and Compliance Assurance
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

- (D) If this permit requires monitoring of a discharge on a calendar basis (i.e., monthly, quarterly) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.

(E) NetDMR Reporting Requirements

1. Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection. Unless otherwise approved in writing by the Commissioner, no later than one-hundred and eighty (180) days after the issuance of this permit, the Permittee shall begin reporting electronically using NetDMR. Specific requirements regarding subscription to NetDMR and submittal of data and reports in hard copy form and for submittal using NetDMR are described below:

a. Submittal of *NetDMR Subscriber Agreement*

On or before fifteen (15) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's discharge monitoring reports ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of DMR information. Information on NetDMR is available on the Department's website at www.ct.gov/deep/netdmr. On or before ninety (90) days after issuance of this permit the Permittee shall submit a signed and notarized copy of the **Connecticut DEEP NetDMR Subscriber Agreement** to the Department.

b. Submittal of Reports Using NetDMR

Unless otherwise approved by the Commissioner, on or before one-hundred and eighty (180) days after issuance of this permit, the Permittee and/or the Signatory Authority shall begin electronically submitting

DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement of Section 5(C) of this permit.

DMRs shall be submitted electronically to the Department no later than the thirtieth (30th) day of the month following the completed reporting period. All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs or other reports to the Department. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR. NetDMR is accessed from: <http://www.epa.gov/netdmr>.

c. Submittal of NetDMR Opt-Out Requests

If the Permittee is able to demonstrate a reasonable basis, such as technical or administrative infeasibility, that precludes the use of NetDMR for electronically submitting DMRs and reports, the Commissioner may approve the submission of DMRs and other required reports in hard copy form ("opt-out request"). Opt-out requests must be submitted in writing to the Department for written approval on or before fifteen (15) days prior to the date a Permittee would be required under this permit to begin filing DMRs and other reports using NetDMR. This demonstration shall be valid for twelve (12) months from the date of the Department's approval and shall thereupon expire. At such time, DMRs and reports shall be submitted electronically to the Department using NetDMR unless the Permittee submits a renewed opt-out request and such request is approved by the Department.

All opt-out requests and requests for the NetDMR subscriber form should be sent to the following address or by email at deep.netdmr@ct.gov:

Attn: NetDMR Coordinator
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

- (F) DMRs submitted to the Department with Priority Pollutant monitoring data shall include as an electronic attachment in NetDMR the respective analytical results, reporting limits and the analytical method numbers performed pursuant to 40 CFR 436 for each of the 126 priority pollutants listed in Appendix A of 40 CFR 423, and shall include the supporting calculated values to demonstrate compliance pursuant to Section 4 of this Permit.
- (G) Copies of all DMRs shall be submitted concurrently to the Bridgeport West Side Publicly Owned Treatment Works ("POTW").

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

- (A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Water Permitting and Enforcement Division (Attn: DMR Processing) within thirty (30) days of the date of the analytical laboratory report identifying the exceedance.
- (B) The Permittee shall immediately notify the Water Permitting and Enforcement Division and the Bridgeport West Side POTW of all discharges that could cause problems to the POTW, including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

SECTION 7: COMPLIANCE SCHEDULE

- (A) On or before fifteen (15) days after the Permittee provides written notification of commercial operation of the facility to ISO New England, the Permittee shall submit a copy of such notification to the Commissioner and shall conduct the analyses for wastewater discharged through Discharge Serial Number ("DSN") 201-1 as required pursuant to Section 7(B) of this Permit.
- (B) On or before thirty days (30) days after the Permittee provides written notification of commercial operation of the facility to ISO New England, or, by June 30, 2019, whichever is sooner, the Permittee shall submit for the Commissioner's review and approval a revised "Attachment I: Operation and Maintenance of the Collection and Treatment Systems: General Description, Plan Checklist and Certification" as required by the Department's *Permit Application for Wastewater Discharges from Manufacturing, Commercial, and Other Activities*.
- (C) On or before forty-five (45) days after the Permittee provides written notification of commercial operation of the facility to ISO New England, the Permittee shall submit for the Commissioner's review a completed "Attachment O, Part B" form from the Department's *Permit Application for Wastewater Discharges from Manufacturing, Commercial, and Other Activities*. Specifically, analyses for wastewater discharged through Discharge Serial Number ("DSN") 201-1 shall be conducted for the following: all parameters listed in Table 1; all toxic metals, cyanides, phenols, volatiles, GS/MS fraction acid compounds in Table 2; any base neutral compounds or pesticides in Table 2 and any parameters in Tables 3 and 4 that are known or suspected to be present in the discharge. In addition, Tables 5, 6 and 7 of "Attachment O, Part B" shall be completed and submitted. The Permittee shall also submit the results of analyses for the 126 priority pollutants listed in Appendix A of 40 CFR 423. All samples shall be collected and analyzed using the sufficiently sensitive methods specified in 40 CFR Part 136.
- (D) Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit, unless otherwise specified in writing by the Commissioner, shall be directed to:

Kim E. Hudak, P.E., Assistant Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

SECTION 8: COMPLIANCE CONDITIONS

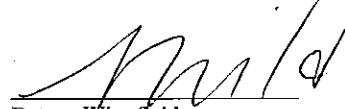
In accordance with 40 CFR 403.8(f)(2)(viii), the Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve (12) months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee that is a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six percent (66%) or more of all measurements taken for the same pollutant parameter during a six (6) month period exceed (by any magnitude) the average monthly, maximum daily, or maximum instantaneous limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period equal or exceed the average monthly, maximum daily, or maximum instantaneous limit(s) multiplied by 1.4 for BOD, TSS, fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction, or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.

- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **Best Management Practices ("BMPs"):** Any other violation or group of violations, which may include a violation of BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

5/24/19



Betsey Wingfield
Deputy Commissioner
Department of Energy and Environmental Protection

BW/MVM/PMP/RJ

cc: City of Bridgeport West Side POTW

ATTACHMENT A
(To be attached to each Discharge Monitoring Report)

“Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standards for New Sources at Title 40 CFR 423.17 Steam Electric Power Generating Point Source Category, I hereby certify to the best of my knowledge and belief, based on my review of all available information including, but not limited to: (1) the discharge monitoring information required pursuant to Section 4 Table B and Table C, and the terms and conditions of Section 4(D) of Permit No. SP0002474, and/or (2) the demonstration approved pursuant to Section 4(E) of Permit No. SP0002474, that no additives or conditioning chemicals used in the facility’s water conditioning program, including but not limited to additives or conditioning chemicals used in the facility’s cooling tower maintenance activities or for the treatment or conditioning of any low volume waste streams discharged to cooling towers, result in detectable amounts (i.e., $\geq 10\mu\text{g/l}$; for asbestos, no detectable fibers/liter) of any of the 126 priority pollutants listed in Appendix A of 40 CFR 423, using sufficiently sensitive methods, in the discharge of cooling tower blowdown since filing of the last periodic report under 40 CFR 403.12(e)(i).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Authorized Representative: _____ Title: _____
(PRINT NAME) (PRINT TITLE)

Signature: _____ Date: _____