

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action  
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: M. SWIFT & SONS, INC.  
Facility Address: 10 Love Lane, Hartford, CT 06112  
Facility EPA ID #: CTD001139054

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

If yes - check here and continue with #2 below.

If no - re-evaluate existing data, or

if data are not available skip to #6 and enter "IN" (more information needed) status code.

**BACKGROUND**

**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future. \_

**Definition of "Current Human Exposures Under Control" EI**

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

**Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

**Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).



reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

**Current Human Exposures Under Control**  
**Environmental Indicator (EI) RCRIS code (CA725)**  
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3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential Human Receptors (Under Current Conditions)

<u>"Contaminated" Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food <sup>3</sup>
Groundwater	---	---	---	---			
Air (indoors)	---	---	---				
Soil (surface, e.g., <2 ft)	---	---	---	---	---	---	---
Surface Water	---	---			---	---	---
Sediment	---	---			---	---	---
Soil (subsurface e.g., >2 ft)	---	---		---			---
Air (outdoors)	---	---	---	---	---		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.
2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("\_\_\_"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

\_\_\_ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

\_\_\_ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

\_\_\_ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s): The whole compound is fenced in and the gate is close, securely monitored to ensure that children and non-employee people do not come in the secured area. The front door leading to the production area is also securely monitored. Visitors are escorted if they go through the factory. There are no contaminated media in the area. The chemicals are contained in place.

<sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

- 4 Can the exposures from any of the complete pathways identified in #3 be reasonably expected to be

*Please Note: The assertion at the bottom of this page, which reinforces Swift & Sons claim regarding CA725 should have been started under question #2 or right after question #6. The facility should have also added as part of the rationale that no releases or exposures to media are occurring - other than air. This is acknowledged by Tracy A. Peter September 27, 2006*

**“significant”**<sup>4</sup> (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

\_\_\_\_\_ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

\_\_\_\_\_ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

\_\_\_\_\_ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s): \_\_\_\_\_  
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<sup>4</sup> If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.



Current Human Exposures Under Control  
Environmental Indicator (EI) RCRIS code (CA725)

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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the M. SWIFT & SONS, INC facility, EPA ID # CTD001139054, located at 10 Love Lane, Hartford under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

NO - "Current Human Exposures" are NOT "Under Control."

IN - More information is needed to make a determination.

Please Note:  
Person identified here as  
Marcie Santa Ana is  
the contact person.  
J.P.  
9/12/00

Completed by (signature) [Signature] Date August 24, 2000  
(print) MARCIE SANTA ANA  
(title) CHEMIST

Supervisor (signature) [Signature] Date 12/8/00  
(print) Matthew R. Hoagland  
(title) Chief RCRS Corrective Action Section  
(EPA Region or State) Reg. I

Completed by  
Juan A. Perez  
Environmental Scientist  
Date: Sept. 12, 2000

Locations where References may be found:

ATTACHMENTS: FINAL PERMIT TO OPERATE THE  
CJS THERMAL INCINERATOR  
CTDEP LETTER RE: SMALL TITLE V  
GENERAL PERMIT TO LIMIT POTENTIAL TO EMIT

Contact telephone and e-mail numbers

(name) \_\_\_\_\_  
(phone #) \_\_\_\_\_  
(e-mail) \_\_\_\_\_

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



September 5, 1997

Ms. Marcie Santa Ana  
M.A. Swift & Sons, Inc.  
10 Love Lane  
Hartford, Connecticut 06141

Dear Ms. Santa Ana:

This letter is to inform you that the Department has completed the evaluation of your application for registration under the General Permit to Limit Potential to Emit from Major Stationary Sources of Air Pollution, for the facility at the above location.

The above mentioned facility does not meet the definition of a Title V source set forth in section 22a-174-33(a)(15) of the Regulations of Connecticut State Agencies(RCSA), and therefore does not require registration under the General Permit.

The Department has come to its conclusion based on calculations provided by you and based on the review of design and operating parameters by the Bureau of Air Management staff. If potential emissions are based on the use of control equipment, failure to maintain the equipment as necessary to limit potential emissions to less than the thresholds established in RCSA section 22a-174-33(a)(15)(F) will result in an enforcement action requiring the submission of a permit application.

This letter in no way grants immunity from legal action resulting from the failure of this source to remain in compliance with existing air pollution regulations, nor does it provide an exemption from compliance with future Federal, State or local legislation.

If you have any questions, contact Ms. Carrie Wintersteen, the engineer who evaluated your permit application, by calling (860) 424-3539.

Sincerely,

A handwritten signature in cursive script that reads "Ernest J. Bouffard".

Ernest J. Bouffard  
Supervising Air Pollution  
Control Engineer

EJB:lag

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAGES 2 THROUGH 7 ARE HEREBY INCORPORATED BY REFERENCE INTO THIS PERMIT

ORIGINAL

TOWN NO. 075	PREMISE NO. 0194	PERMIT NO. 0058	STACK NO. 06
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EQUIPMENT CLASSIFICATION

FUEL BURNING  INCINERATOR  PROCESS MFG. OTHER \_\_\_\_\_

DATE ISSUED \_\_\_\_\_ EXPIRATION DATE (NONE UNLESS NOTED) \_\_\_\_\_

PERMIT TO :  CONSTRUCT  OPERATE OTHER Final Permit to Operate

PREMISE TYPE :

PREMISE W/ POTENTIAL EMISSIONS  $\geq$  100 TPY WITHOUT PERMIT (i.e., EPA-"MAJOR SOURCE")

PREMISE W/ POTENTIAL EMISSIONS  $\geq$  100 TPY WITH PERMIT (i.e., EPA-"MAJOR SOURCE")

PREMISE W/ POTENTIAL EMISSIONS < 100 TPY (i.e., EPA-"MINOR SOURCE")

TYPE OF POLLUTANT FOR WHICH A PREMISE IS A "MAJOR SOURCE" :

<input type="checkbox"/> SO <sub>2</sub>	<input type="checkbox"/> SO <sub>2</sub>
<input type="checkbox"/> NO <sub>x</sub>	<input type="checkbox"/> NO <sub>x</sub>
<input type="checkbox"/> CO	<input type="checkbox"/> CO
<input type="checkbox"/> TSP	<input type="checkbox"/> TSP
<input checked="" type="checkbox"/> VOC	<input type="checkbox"/> VOC
<input type="checkbox"/> PM-10	<input type="checkbox"/> PM-10

OTHER \_\_\_\_\_ OTHER \_\_\_\_\_

TYPE OF MODIFICATION :  MAJOR MODIFICATION  MINOR MODIFICATION  NEW SITING

TYPE OF SOURCE :

A1 SOURCE (ACTUAL EMISSIONS  $\geq$  100 TPY OR FOR A PREMISE WITH CONTROLS, POTENTIAL EMISSIONS  $\geq$  100 TPY)

A2 SOURCE (ACTUAL EMISSIONS < 100 TPY, AND;  
1) FOR A PREMISE WITHOUT CONTROLS, POTENTIAL EMISSIONS  $\geq$  100 TPY, OR  
2) FOR A PREMISE WITH CONTROLS, MAXIMUM UNCONTROLLED EMISSIONS  $\geq$  100 TPY)

B SOURCE  NSPS SOURCE  NESHAPS SOURCE

EQUIPMENT DESCRIPTION  
CJS ENERGY RESOURCES THERMAL INCINERATOR

LOCATION OF EQUIPMENT (No. & Street, Town, Zip)  
10 LOVE LANE, HARTFORD, CONNECTICUT 06141

FIRM NAME  
M. SWIFT AND SONS, INCORPORATED



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ORIGINAL

TOWN NO. 075	PREMISE NO. 0194	PERMIT NO. 0058	STACK NO. 06
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EQUIPMENT CLASSIFICATION		DATE ISSUED	EXPIRATION DATE (NONE UNLESS NOTED)
<input type="checkbox"/> FUEL BURNING	<input checked="" type="checkbox"/> INCINERATOR		
<input type="checkbox"/> PROCESS MFG.		OTHER _____	

THE FOLLOWING SHALL BE CONSTRUCTED/OPERATED IN ACCORDANCE WITH THE SPECIFICATIONS LISTED IN THE PERMIT APPLICATION, WITH THE TERMS OF THE PERMIT LETTER, AND WITH ALL APPLICABLE SECTIONS OF THE CONNECTICUT "ADMINISTRATIVE REGULATIONS" FOR THE ABATEMENT OF AIR POLLUTION."

EQUIPMENT DESCRIPTION (I.D.): CJS ENERGY RESOURCES THERMAL INCINERATOR

The conditions on this permit shall be verified at all times except those designated as design specifications.

- PART I. MAXIMUM COATING VOC CONTENT AS APPLIED (lb/gal): 6.14
- PART II. MAXIMUM HOURLY AVERAGE COATING APPLICATION RATE (gal/hr): 43.4
- PART III. MAXIMUM CONSECUTIVE TWELVE (12) MONTH COATING APPLICATION RATE (gal): 83,675

PART IV. CONTROL EQUIPMENT:

A. CJS Energy Resources Incinerator

1. Stack flow rate: 5600 acfm\*
2. Minimum secondary chamber combustion temperature: 1400° F
3. Minimum overall removal efficiency: 93%
4. Minimum stack height above grade: 50 ft\*
5. Minimum distance of stack to property line: 50 ft\*
6. Maximum fuel firing rate: 3800 cu ft/hr\*

\*Design specifications need not be verified on a continuous basis, however, if requested by this Bureau, demonstration of compliance shall be shown.

RECORDS INDICATING CONTINUAL COMPLIANCE WITH ALL ABOVE CONDITIONS MUST BE KEPT ON SITE AT ALL TIMES AND MADE AVAILABLE UPON DEPARTMENTAL REQUEST FOR THE DURATION OF THIS PERMIT.

FIRM NAME  
M. SWIFT AND SONS, INCORPORATED

LOCATION OF EQUIPMENT (No. & Street, Town, Zip)  
10 LOVE LANE, HARTFORD, CONNECTICUT 06141

APPLICANT'S SIGNATURE 	COMMISSIONER OR HIS REPRESENTATIVE
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PERMIT IS INVALID UNLESS SIGNED BY APPLICANT, SUCH SIGNATURE CONSTITUTING AGREEMENT TO THE CONDITIONS IN THIS PERMIT.

BUREAU OF AIR MANAGEMENT - PERMITS



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ORIGINAL

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EQUIPMENT CLASSIFICATION

FUEL BURNING  INCINERATOR  PROCESS MFG. OTHER \_\_\_\_\_

DATE ISSUED

EXPIRATION DATE  
(NONE UNLESS NOTED)

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EQUIPMENT DESCRIPTION (I.D.): CJS ENERGY RESOURCES THERMAL INCINERATOR

PART V. OPERATING CONDITIONS:

- A. The permittee shall not cause or permit the emission of any substance which creates or contributes to an odor, in the ambient air, that constitutes a nuisance as defined in Section 22a-174-23 of the Regulations of Connecticut State Agencies (hereinafter referred to as the Regulations). Failure to comply with this requirement may result in the assessment of civil penalties and/or the issuance of a State Order.
- B. All open containers that contain coating, solvent, or rags shall be covered so as to minimize the amount of VOC emitted to the atmosphere.

PART VI. CONTROL EQUIPMENT MALFUNCTION:

See Appendix A.

PART VII. RECORDKEEPING REQUIREMENTS:

- A. Compliance with Part I shall be determined by recording the following data for each coating used by this equipment:
  1. description of the coating including the coating name and coating density in pounds per gallon;
  2. volatile organic compound content by weight;
  3. water and exempt volatile organic compound content by weight;
  4. non-volatile content by volume and by weight; and,
  5. total amount of diluent used for each coating in pounds and in gallons.

RECORDS INDICATING CONTINUAL COMPLIANCE WITH ALL ABOVE CONDITIONS MUST BE KEPT ON SITE AT ALL TIMES AND MADE AVAILABLE UPON DEPARTMENTAL REQUEST FOR THE DURATION OF THIS PERMIT.

FIRM NAME M. SWIFT AND SONS, INCORPORATED

LOCATION OF EQUIPMENT (No. & Street, Town, Zip)  
10 LOVE LANE, HARTFORD, CONNECTICUT 06141



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ORIGINAL

TOWN NO. 075	PREMISE NO. 0194	PERMIT NO. 0058	STACK NO. 06
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EQUIPMENT CLASSIFICATION		DATE ISSUED	EXPIRATION DATE (NONE UNLESS NOTED)
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<input type="checkbox"/> PROCESS MFG.	OTHER _____		

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EQUIPMENT DESCRIPTION (I.D.): CJS ENERGY RESOURCES THERMAL INCINERATOR

PART VII. RECORDKEEPING REQUIREMENTS, continued:

- B. Compliance with part II shall be determined by dividing the daily quantity of all coatings used by the daily hours of operation. This calculation shall be performed daily.
- C. Compliance with part III shall be determined by adding the current month's coating use to that of the previous eleven (11) months' coating use. This calculation shall be performed monthly.
- D. Compliance with part IV.A.2. shall be determined by installing a chart recorder to continuously monitor and record the incinerator combustion temperature. Each chart shall be dated.
- E. Compliance with part IV.A.3 shall be met by presenting the March 11, 1991 letter (from Mr. Steven Peplau, Connecticut Department of Environmental Protection, to Ms. Marcie Santa Ana, M. Swift and Sons, Incorporated) along with the maximum coating application rate data and temperature charts to the Bureau upon request. If the applicant can show application rates and temperature data which comply with the conditions of this permit, the minimum overall removal efficiency will be presumed to be 93%.
- F. All data required by part VII shall be maintained on site dating back a minimum of three years and be made available to this Bureau upon request.

PART VIII. HAZARDOUS AIR POLLUTANT MASC COMPLIANCE:

Coatings, diluents, or cleaners used by this source now or in the future, either for production or on a trial basis, which contain hazardous air pollutants (HAP) that are regulated under Section 22a-174-29 of the Regulations, are allowed provided that:

RECORDS INDICATING CONTINUAL COMPLIANCE WITH ALL ABOVE CONDITIONS MUST BE KEPT ON SITE AT ALL TIMES AND MADE AVAILABLE UPON DEPARTMENTAL REQUEST FOR THE DURATION OF THIS PERMIT.

FIRM NAME M. SWIFT AND SONS, INCORPORATED

LOCATION OF EQUIPMENT (No. & Street, Town, Zip) 10 LOVE LANE, HARTFORD, CONNECTICUT 06141



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ORIGINAL

TOWN NO. 075	PREMISE NO. 0194	PERMIT NO. 0058	STACK NO. 06
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EQUIPMENT CLASSIFICATION

FUEL BURNING     INCINERATOR     PROCESS MFG.    OTHER \_\_\_\_\_

DATE ISSUED \_\_\_\_\_

EXPIRATION DATE (NONE UNLESS NOTED) \_\_\_\_\_

THE FOLLOWING SHALL BE CONSTRUCTED/OPERATED IN ACCORDANCE WITH THE SPECIFICATIONS LISTED IN THE PERMIT APPLICATION, WITH THE TERMS OF THE PERMIT LETTER, AND WITH ALL APPLICABLE SECTIONS OF THE CONNECTICUT "ADMINISTRATIVE REGULATIONS" FOR THE ABATEMENT OF AIR POLLUTION."

EQUIPMENT DESCRIPTION (I.D.):                    CJS ENERGY RESOURCES THERMAL INCINERATOR

PART VIII. HAZARDOUS AIR POLLUTANT MASC COMPLIANCE, continued:

A. the source can demonstrate that the HAPs emitted from the use of any such coating, diluent, or cleaner do not exceed the maximum allowable stack concentrations (MASCs) using the following equation:

$$1b \text{ HAP/gal} = C2 * HLV$$

$$\text{where } C2 = C1 * \frac{[(62.43E-12) * \text{exhaust rate (ACFM)} * 60]}{\text{application rate (gal/hr)}}$$

$$C1 = \frac{.885(X + 1.08V^{.64})1.56}{V}$$

X - property line distance, (m)  
V - exhaust flow, (m<sup>3</sup>/sec)

HLV - hazard limiting value, (ug/m<sup>3</sup>)

This concentration (1b HAP/gal) for each HAP is derived using the HAP's corresponding HLV (8 hr) as listed in Section 22a-174-29 of the Regulations and is based on the stack parameters in part IV of this permit.

The actual coating concentration shall be the HAP's content in the coating as applied (1b HAP/gal). An actual coating concentration equal to or less than that calculated in the above equation demonstrates compliance with the MASC;

B. the source does not exceed the 8 lb/hr limit from coating VOCs;

RECORDS INDICATING CONTINUAL COMPLIANCE WITH ALL ABOVE CONDITIONS MUST BE KEPT ON SITE AT ALL TIMES AND MADE AVAILABLE UPON DEPARTMENTAL REQUEST FOR THE DURATION OF THIS PERMIT.

FIRM NAME M. SWIFT AND SONS, INCORPORATED

LOCATION OF EQUIPMENT (No. & Street, Town, Zip) 10 LOVE LANE, HARTFORD, CONNECTICUT 06141



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DEPARTMENT OF ENVIRONMENTAL PROTECTION

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EQUIPMENT DESCRIPTION (I.D.): CJS ENERGY RESOURCES THERMAL INCINERATOR

PART VIII. HAZARDOUS AIR POLLUTANT MASC COMPLIANCE, continued:

- C. the change does not otherwise constitute a modification, as defined in Section 22a-174-1 of the Regulations; and,
- D. the emissions from any new compounds, for production of trial runs, shall be counted toward any applicable emission limit in this permit.

PART IX. PROCEDURE TO DETERMINE COMPLIANCE WITH TABLE 1 OF THIS PERMIT:

- A. If requested by this Bureau, the TSP, SO<sub>x</sub>, NO<sub>x</sub>, CO, formaldehyde emission rates shall be calculated using the limits contained in part IV and EPA document AP-42 fourth edition, dated July 1993, tables 1.4-1, 1.4-2, and memo dated 10/7/92 (Lisa Childress, APCE) on Natural Gas Fired Boiler AP-42 Supplement E Emission Factors.
- B. If requested by this Bureau, the VOC emission rate shall be determined by presenting the data required by parts VII A, B, C, and consider the overall removal efficiency as stated in part IV A.3.

RECORDS INDICATING CONTINUAL COMPLIANCE WITH ALL ABOVE CONDITIONS MUST BE KEPT ON SITE AT ALL TIMES AND MADE AVAILABLE UPON DEPARTMENTAL REQUEST FOR THE DURATION OF THIS PERMIT.

FIRM NAME M. SWIFT AND SONS, INCORPORATED

LOCATION OF EQUIPMENT (No. & Street, Town, Zip) 10 LOVE LANE, HARTFORD, CONNECTICUT 06141



ORIGINAL

OPERATING MODE ID:

CJS Energy Resources  
Thermal Incinerator

TOWN NO.	PREMISE NO.	PERMIT NO.	STACK NO.
075	0194	0058	06

<u>CRITERIA POLLUTANTS</u>	<u>LB/HOUR</u>	<u>ASC*</u> <u>(ug/m<sup>3</sup>)</u>	<u>TPY</u>
TSP	0.05		0.2
SO <sub>x</sub> , expressed as SO <sub>2</sub>	0.002		0.01
NO <sub>x</sub> , expressed as NO <sub>2</sub>	0.38		1.7
HC	8.02		7.8
CO	0.08		0.4
Pb	0.0		0.0
PM-10	0.05		0.2
<u>NON-CRITERIA POLLUTANTS</u>			
H <sub>2</sub> SO <sub>4</sub> <del>XXXXXX</del> Formaldehyde		40.0	
Methyl ethyl ketone		51404	
Ethyl acetate		396307	
Ethyl alcohol		622622	
Butyl acetate		104760	
Isopropyl alcohol		165156	
Dibutyl acetate		2969	
VMP naptha		370350	
Methanol		11027	

COMMENTS: \*Allowable Stack Concentration. Includes emissions from natural gas.

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FIRM NAME  
M. SWIFT AND SONS, INCORPORATED

LOCATION OF EQUIPMENT (No. & Street, Town, Zip)  
10 LOVE LANE, HARTFORD, CONNECTICUT 06141

ALD  
6-27-95

SP 1336

4-6-90-95

P.E.T.  
C.T.O.S.A.  
C.P.O.C.S.V.  
95-07

PERMIT

M. Swift and Sons, Inc.  
10 Love Lane  
Hartford, CT 06141-0150

Re: DEP/WPC 064-098  
City of Hartford  
Connecticut River Watershed

Attention: M. Allen Swift, President

This permit is issued in accordance with Section 22a-430 of Chapter 446k of the Connecticut General Statutes and regulations adopted thereunder, as amended. The Commissioner of Environmental Protection (hereinafter "the Commissioner") has found that the discharge will not cause pollution of the waters of the state the system installed for the treatment of the discharge will protect the waters of the state from pollution. This action is further found to be consistent with the applicable policies of the Connecticut Coastal Management Act Section 22a-92 of the Connecticut General Statutes.

Your application for permit issuance, submitted by M. Swift and Sons, Inc. on April 26, 1988, with revisions dated October 9, 1989 and November 9, 1989, has been reviewed by the Connecticut Department of Environmental Protection.

The Commissioner, acting under Section 22a-430 hereby permits M. Swift and Sons, Inc., to discharge treated metal finishing wastewater in accordance with the following conditions:

- 1) The wastewater shall be collected, pretreated and discharged in accordance with the above referenced application and all approvals issued by the Commissioner or her agent for the discharges and/or activities authorized by or associated with this permit.
- 2) The discharges shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharges shall be monitored and results reported to the Director of the Water Management Bureau by the end of the month after the month in which samples are taken according to the following schedule:

- A. Discharge Serial No. 001  
Description: metal finishing wastewater  
Code 501035X  
Discharge Location: Metropolitan District Commission  
Combined sanitary and storm sewerage system in the  
City of Hartford (DEP/WPC No. 064-001)  
Average Daily Flow: 720 gallons per day  
Maximum Daily Flow: 1,440 gallons per day

- (1) The pH of the discharge shall not be less than 6.0 or greater than 9.0 (Code 609-012).
- (2) The maximum daily concentrations specified below shall not be exceeded by more than a factor of 1.5 at any time as determined by a grab sample.

Parameter	Code	Average Monthly Limits	Maximum Daily Limits	Minimum Frequency of Sampling	Sample Type
71910 Gold, Total	112-19	0.1 mg/l	0.5 mg/l	Monthly	Daily Composite
00722 Cyanide, Amenable	504-19	0.1 mg/l	0.2 mg/l	Monthly	Grab Sample Average
00720 Cyanide, Total	505-19	0.65 mg/l	1.2 mg/l	Monthly	Grab Sample Average
00400 pH 6.0, 9.0	609-12	----	----	Monthly	Range during Composite
00530 Total Suspended Solids	614-19	100 mg/l	200 mg/l	Monthly	Daily Composite
78141 Total Toxic Organics	628-19	0.5 mg/l	1.0 mg/l	Monthly	Grab

- (a) The permittee shall record the total flow (Code 626-007) and number of hours of discharge (Code 629-079) for the day of sample collection and/or the instantaneous flow (Code 627-078) at the time of grab sample collection. <sup>81381</sup>  
00058
- (b) The report shall include a detailed explanation of any violations of the limitations specified above. <sup>1440</sup>
- (c) In lieu of analyzing for Total Toxic Organics at the frequency required above, each monthly report may include a statement certifying compliance with a Solvent Management Plan approved by the Commissioner in accordance with 40CFR433.33 (Electroplating). Monitoring for Total Toxic Organics at the frequency required above shall be done until such approval has been issued.

A. Discharge Serial No. 002

Description: non contact cooling water  
Code 502000b

Discharge Location: Metropolitan District Commission  
Combined sanitary and storm sewerage system in the  
City of Hartford (DEP/WPC No. 064-001)

Average Daily Flow: 10,741 gallons per day

Maximum Daily Flow: 15,235 gallons per day

- (1) The pH of the discharge shall not be less than 6.0 or greater than 9.0 (Code 609-012).

- (a) The permittee shall record the total flow (Code 626-007) and number of hours of discharge (Code 629-079) for the day of sample collection and/or the instantaneous flow (Code 627-078) at the time of grab sample collection.
- (b) The report shall include a detailed explanation of any violations of the limitations specified above.

A. Discharge Serial No. 003

Description: non contact cooling water  
Code 502000a

Discharge Location: Metropolitan District Commission  
Combined sanitary and storm sewerage system in the  
City of Hartford (DEP/WPC No. 064-001)

Average Daily Flow: 2,071 gallons per day

Maximum Daily Flow: 3,326 gallons per day

- (1) The pH of the discharge shall not be less than 6.0 or greater than 9.0 (Code 609-012).
  - (a) The permittee shall record the total flow (Code 626-007) and number of hours of discharge (Code 629-079) for the day of sample collection and/or the instantaneous flow (Code 627-078) at the time of grab sample collection.
  - (b) The report shall include a detailed explanation of any violations of the limitations specified above.

This permit is issued under Section 22a-430 and shall expire on  
APRIL 6, 1995.

This permit shall be subject to the following sections of the Regulations of Connecticut State Agencies which are hereby incorporated into this permit:

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

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

Your attention is especially drawn to the notification requirements of subsection (i)(2), (i)(3), (j)(6), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of Section 22a-430-3.

This Permit requires the payment of a compliance determination fee annually as set forth in Section 22a-430-7 of the Regulations of Connecticut State Agencies.

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 which may be authorized under the Clean Water Act or the Connecticut General Statutes or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Clean Water Act or Connecticut General Statutes or regulations adopted thereunder which are then applicable.

Entered as a Permit of the Commissioner of the Department of Environmental Protection on the 6TH DAY OF APRIL, 1990.

JOHN W. ANDERSON  
 John W. Anderson  
 Deputy Commissioner

APPLICATION NO. 89-145  
 PERMIT NO. SPO001336



GARY LEAVITT \_\_\_\_\_  
 WES WINTERBOTTOM \_\_\_\_\_  
 KEN MAJOR \_\_\_\_\_  
 ROBERT KALISZEWSKI \_\_\_\_\_  
 JOSEPH HOLMES \_\_\_\_\_  
 DENNIS RAYBURN \_\_\_\_\_  
 CAROL HOBBS \_\_\_\_\_  
 DICK MASON \_\_\_\_\_  
 MARC OTFINOSKI \_\_\_\_\_  
 OZZIE INGLESE \_\_\_\_\_  
 BOB LORENTSON \_\_\_\_\_  
 CHRIS YARIO cy \_\_\_\_\_  
 MICHELE DINOIA \_\_\_\_\_  
 JIM GRIER \_\_\_\_\_  
 PETER PLOCH \_\_\_\_\_  
 DAVID CHERICO \_\_\_\_\_  
 ELSIE PATTON \_\_\_\_\_  
 SCOTT WING \_\_\_\_\_  
 NAOMI DAVIDSON \_\_\_\_\_  
 BRENDA EKWURZEL \_\_\_\_\_  
 CORINNE FITTING \_\_\_\_\_  
 MAURICE HAMEL \_\_\_\_\_  
 ROB ROBINSON \_\_\_\_\_  
 WALTER SINNOTT \_\_\_\_\_  
 WARREN HERZIG \_\_\_\_\_  
 JOSEPH WETTEMANN \_\_\_\_\_  
 BOB NORWOOD \_\_\_\_\_  
 KIM KISILIS \_\_\_\_\_  
 FRED WIWIE \_\_\_\_\_  
 MIKE HARDER \_\_\_\_\_  
 ADRIAN P. FREUND \_\_\_\_\_

STATE PERMIT

KEYWORDS

UNIT: WCU

SUBUNIT: I1

CATEGORY: STATE  
SUBCATEGORY: PERMIT

ISSUED WITH AN ACCOMPANYING ORDER \_\_\_\_\_

STATE APPLICATION NO. 89-145 \_\_\_\_\_

COMPANY NAME: M. SWIFT AND SONS, INC.

30 DAY HOLD UP    /   /   

DRAFT PERMIT   x  

FINAL PERMIT \_\_\_\_\_

DEP/WPC NO. 064-098 \_\_\_\_\_

REMARKS: