



PRETREATMENT PERMIT

issued to

Permittee:

H.N.S. Management Company, Inc.
CT Transit—Hartford Division
100 Leibert Road
P.O. Box 66
Hartford, CT 06141-0066

Location Address:

100 Leibert Road
Hartford, CT 06141-0066

Permit ID: SP0002218

Permit Expires: September 30, 2017

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued 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 (MOA) 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) **H.N.S. Management Company, Inc.**, ("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 subsection (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 to Comply
- (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 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 Regulations of Connecticut State Agencies.

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 section 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 DMR.

"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.

"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 composite" means (1) a composite sample taken over a full operating day consisting of grab samples collected at equal intervals of no more than sixty (60) minutes and combined proportionally to flow, or (2) a composite sample continuously collected over a full operating day proportionally to flow. Upon submission of documentation by the applicant satisfactory to the commissioner that a discharge is of consistent effluent quality, the commissioner may allow equal sampling intervals of up to four (4) hours for a daily composite sample.

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

"Grab Sample Average" or "GSA" means the arithmetic average of all grab sample analyses. Grab samples shall be collected at least 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).

"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".

"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 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.

SECTION 3: COMMISSIONER'S DECISION

- (A) The Commissioner has made a final determination and found that the continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's decision is based on Application No. 201204752 for permit reissuance received on May 25, 2012 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including October 31, 2012, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002218, issued by the Commissioner to the Permittee on November 26, 2007 the previous application submitted by the Permittee on August 20, 2004 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. SP0002218, issued by the Commissioner to the Permittee on November 26, 2007.
- (2) From November 1, 2012 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. SP0002218, issued by the Commissioner to the Permittee on October 1, 2012, Application No. 201204752 received by the Department on May 25, 2012, 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. SP0002218, issued by the Commissioner to the Permittee on October 1, 2012.

- (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 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 Federal Clean Water Act or Connecticut General Statutes 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: 001-1 **Monitoring Location:** 1
Wastewater Description: Pretreated bus washing, floor washing, air compressor condensate, undercarriage wash, and transmission dynamometer wastewaters
Monitoring Location Description: At sampling port on effluent line from oil/water separator
Discharge is to: The Metropolitan District Commission Hartford Water Pollution Control Facility

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
Chromium, Total	mg/l	NA	---	Quarterly	Daily Composite	NA	NR	Grab
Copper, Total	mg/l	NA	2.0	Monthly	Daily Composite	3.0	NR	Grab
Flow Rate, (Average Daily) ¹	gpd	38,500	NA	Daily	Total Flow	NA	NR	NA
Flow Total (Day of Sampling)	gpd	NA	50,000	Monthly	Total Flow	NA	NR	NA
Flow, Maximum During 24 hr Period ¹	gpd	NA	50,000	Daily	Total Flow	NA	NR	NA
Lead, Total	mg/l	NA	0.75	Monthly	Daily Composite	1.1	NR	Grab
Oil and Grease, Total	mg/l	NA	100.0	Monthly	GSA	150.0	NR	Grab
pH (Day of Sampling)	S.U.	NA	NA	NR	NA	6.0 - 10.0	Monthly	RDS
Surfactants (MBAS)	mg/l	NA	----	Quarterly	Daily Composite	NA	NR	Grab
Total Suspended Solids	mg/l	---	---	Monthly	Daily Composite	NA	NR	Grab
Zinc, Total	mg/l	NA	3.0	Monthly	Daily Composite	4.5	NR	Grab

Table A Footnotes :

Footnotes:

¹ For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Average Daily Flow and Maximum Daily Flow for each 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 frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.

- (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) The Permittee shall collect all engine/steam clean, battery cleaning, and dirty dock wastes and dispose of these materials through a licensed hauler in a manner acceptable to the Commissioner.

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 Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance at the following address. 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 this address by the last day of the month following the month in which samples are taken.

Bureau of Materials Management and Compliance Assurance
 Water Permitting and Enforcement Division (Attn: DMR Processing)
 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 (e.g. Monthly, quarterly, etc.) 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 discharge monitoring reports (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

RCSA Section 22a-430-3(b)(2) shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of Discharge Monitoring Report (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 electronically submit 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 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) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority ("WPCA") involved in the treatment and collection of the permitted discharge.

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 Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing) within 30 days of the exceedance.
- (B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("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 Bureau of Materials Management and Compliance Assurance within 24 hours of becoming aware of the violation.

SECTION 7: 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 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 (66%) percent or more of all measurements taken for the same pollutant parameter during a six-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 (33%) or more of all of the measurements taken for the same pollutant parameter during a six-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 45 days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within 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.
- **BMPs:** Any other violation or group of violations, which may include a violation of Best Management Practices, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

10/1/12



Macky McCleary
Deputy Commissioner

MM/EW

cc: The Metropolitan District Commission Hartford WPCF

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: H.N.S. Management Company, Inc.

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0002218

APPLICATION #: 201204752

<u>Mailing Address:</u>					<u>Location Address:</u>				
Street:	100 Leibert Road, P.O. Box 66				Street:	Same			
City:	Hartford	ST:	CT	Zip: 06141-0066	City:		ST:	CT	
Contact Name:	Richard Dent				DMR Contact:	Same			
Phone No.:	(860) 707-1263				Phone No.:				
Contact E-mail:	ddent@cttransit.com				DMR Contact E-mail:				

PERMIT INFORMATION

DURATION 5 YEAR X 10 YEAR ___ 30 YEAR ___

TYPE New ___ Reissuance X Modification ___

CATEGORIZATION POINT (X) NON-POINT () GIS # ___

NPDES () PRETREAT (X) GROUND WATER(UIC) () GROUND WATER (OTHER) ()

NPDES MAJOR(MA) ___

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) ___

NPDES or PRETREATMENT MINOR (MI) X

PRETREAT SIGNIFICANT INDUS USER(SIU) X

PRETREAT CATEGORICAL (CIU) ___

POLLUTION PREVENTION MANDATE ___ ENVIRONMENTAL EQUITY ISSUE ___

SIC CODE: 4173 Terminal and Service Facilities for Motor Vehicle Passenger Transportation

COMPLIANCE ISSUES

COMPLIANCE SCHEDULE YES ___ NO X

POLLUTION PREVENTION ___ TREATMENT REQUIREMENT ___ WATER CONSERVATION ___

WATER QUALITY REQUIREMENT ___ REMEDIATION ___ OTHER ___

IS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? NO X YES ___

OWNERSHIP CODE

Private ___ Federal ___ State X Municipal (town only) ___ Other public ___

DEEP STAFF ENGINEER Enna Wilson

PERMIT FEES

PERMIT No. SP0002218

Discharge Code	DSN Number	Annual Fee
519000c	001-1	\$ 4,330.00

FOR SEWER DISCHARGES

Discharge to the Metropolitan District Commission Hartford WPCF via its collection system. The facility ID. of the POTW is 064-001.

NATURE OF BUSINESS GENERATING DISCHARGE

H.N.S. Management Company, Inc. is primarily engaged in the operation of motor vehicle passenger terminals and of maintenance and service facilities. Bus maintenance and service include bus exterior washing and interior cleaning. CT Transit is an entity operated by H.N.S. Management Company, Inc. under contract with CT Department of Transportation (DOT) that provides public bus transportation in the greater Hartford area. The CT transit facility is used for bus washing, servicing, repair and storage, and administration offices.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: Consists of a maximum daily flow of 50,000 gallons per day of pretreated bus washing, floor washing, air compressor condensate, undercarriage wash, and transmission dynamometer wastewaters. Wastewaters receive grit removal and oil/water separation.

EFFLUENT VIOLATIONS

Based on DMR data from January 2010- March 2012, the following violations were observed for DSN 001:

MONTH/YEAR	PARAMETER	TYPE OF LIMIT	PERMITTED	EXCEEDENCE (mg/L)	REASON	CORRECTIVE ACTION
07/31/2010	Lead, total	Maximum, Daily	0.8	1.8	Was reported to be the undercarriage bus frames deterioration due to the calcium chloride treatment on the state roads.	Segregation of two wastewater streams that contain high metal content: the "dirty dock and engine/steam clean. These wastewaters are held in containment sumps and are pumped out twice per week for off-site disposal by a licensed hauler in a manner acceptable to the Commissioner.
08/31/2010	Lead, total	Maximum, Daily	0.8	0.9		
01/31/2010	Zinc, total	Maximum, Daily	3.0	4.3		
02/28/2010	Zinc, total	Maximum, Daily	3.0	3.9		
04/30/2010	Zinc, total	Maximum, Daily	3.0	3.6		
07/31/2010	Zinc, total	Maximum, Daily	3.0	5.6		
08/31/2010	Zinc, total	Maximum, Daily	3.0	5.4		
09/30/2010	Zinc, total	Maximum, Daily	3.0	5.9		
10/31/2010	Zinc, total	Maximum, Daily	3.0	5.3		
11/30/2010	Zinc, total	Maximum, Daily	3.0	5.1		
12/31/2010	Zinc, total	Maximum, Daily	3.0	3.4		
07/31/2011	Oil & Grease	Maximum, Daily	100.0	108.0	Improper sampling procedures	Training was given to staff to prevent recurrence

RESOURCES USED TO DRAFT PERMIT

- Federal Effluent Limitation Guideline 40 CFR 403
General Pretreatment Regulations Subcategory
- Performance Standards
- Federal Development Document _____
Name of category

- Treatability Manual*
- Department File Information*
- Connecticut Water Quality Standards*
- Anti-degradation Policy*
- Coastal Management Consistency Review Form*
- Other – Explain*

BASIS FOR LIMITATIONS, STANDARDS, OR CONDITIONS

- Case-by-Case Determination and Best Professional Judgment (AML, MDL, MIL)*
DSN 001-1: pH, total copper, chromium, oil & grease, lead, suspended solids, and zinc, surfactants (MBAS)

AML- Average Monthly limit, MDL-Maximum Daily Limit, MIL-Maximum Instantaneous Limit

GENERAL COMMENTS

Limits and monitoring in this permit were derived by the application of Best Professional Judgment on a Case-by-Case Basis per Section 22a-430-4(m) of the Regulations of Connecticut State Agencies.

Effluent monitoring requirements in this permit reflect information received in the application for the permit renewal and from supporting documents. The DEEP staff evaluated this application and determined that limits are needed for pH, total copper, oil & grease, lead, and zinc to protect the Metropolitan District Commission Hartford WPCF from adverse impacts.

Proposed Effluent Limitations and Requirements

DEEP staff is recommending pH limits of (6.0 - 10.0) S.U., which are considered to be protective of sanitary sewer systems.

The effluent limitations proposed for total oil and grease are based on a report entitled "Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works," USEPA, Effluent Guidelines Division, EPA/440/1-75-066 (April 1975).

Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (RCSA) was used as a guideline in establishing limitations for total copper.

DEEP staff has derived total lead and zinc limits for H.N.S. Management Company, Inc. consistent with section 22a-430-4(m) of the Regulations of Connecticut State Agencies. These limits were developed utilizing a statistical evaluation of effluent performance data from discharge monitoring reports (DMRs) submitted by H.N.S. Management Company. The total lead and zinc MDL and MIL limits are performance based limits, which are based on the 95th percentile of sample results reported by the Permittee on DMRs over the last five years (2007 to 2012).

During the technical review of the H.N.S. Management Company, Inc.'s renewal application and supporting analytical results, total chromium and surfactants (MBAS) were listed as being at a concentration of at least 0.47 mg/l and 5.6 mg/l, respectively. DEEP staff is recommending quarterly monitoring requirements for total chromium and surfactants (MBAS) in this permit renewal.

Since January 2011, in order to prevent recurrence of zinc violations, the Permittee has segregated the engine/steam clean and dirty dock wastewaters and these wastewaters are no longer directed to the wastewater collection system. These wastewaters are held in containment sumps located in the rebuild room are pumped out twice per week by a licensed waste hauler for off-site disposal. Since then the Permittee has maintained compliance with the effluent limitations of the existing permit. Therefore, the engine/steam clean and dirty dock wastewater discharges are not included in this permit

renewal. A special condition is included in Section 4(D) of this permit that reads "The Permittee shall collect all engine/steam clean, battery cleaning, and dirty dock wastes and dispose of these materials through a licensed hauler in a manner acceptable to the Commissioner."

The Permittee is also subject to the terms and conditions of the following general permits:

General Permits for the Discharge of Stormwater Associated with Industrial Activity (GSI000696).