



PRETREATMENT PERMIT

issued to

United Parcel Service, Inc.
Hanger 85-179
Schoephoester Road
Windsor Locks, CT 06096

Location Address:
Same

Permit ID: SP0002365

Permit Expires: March 18, 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 (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) United Parcel Service, ("**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
- (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, including the requirement to further limit or cease the discharge at the written request of the Metropolitan District Commission (MDC).
- (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.

"Batch" means the contents of the dilute propylene glycol/stormwater holding tank (AST #2) utilized prior to discharge as shown in Attachment F of Application No.201101030.

"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.

"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.

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

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

"Range During Sampling ("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 of Energy and Environmental Protection ("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 decision is based on Application No. 201101030 for permit issuance received on February 23, 2011, and the administrative record established in the processing of that application.
- (B)
 - (1) From the issuance of this permit through and including March 31, 2014, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002365, issued by the Commissioner to the Permittee on August 23, 2001, the previous application submitted by the Permittee on December 10, 1999 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. SP0002365, issued by the Commissioner to the Permittee on August 23, 2001.
 - (2) From April 1, 2014 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. SP0002365, issued by the Commissioner to the Permittee on March 19, 2014, Application No. 201101030 received by the Department on February 23, 2011, 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. SP0002365 issued by the Commissioner to the Permittee on March 19, 2014.
- (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 which 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

Monitoring Location: 1

Discharge Serial Number: 001-1

Wastewater Description: propylene glycol contaminated stormwater from aircraft deicing

Monitoring Location Description: Following batch holding tank AST-2

Discharge is to: The MDC Windsor/Poquonock Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency (see Remark 1 below)	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency	Sample Type or measurement to be reported	
Propylene Glycol, Total	mg/l	----	----	NA	NR	NA	Each Batch//Monthly	Grab	
Biochemical Oxygen Demand (BOD) (5-day) 310	lbs/d	----	375	NA	Calculated ⁴	NA	Each Batch//Monthly	NA	
Biochemical Oxygen Demand (BOD) (5-day) 310	mg/L	----	----	NA	NR	NA	Each Batch//Monthly	Grab	
Chemical Oxygen Demand 81017	mg/l	----	----	NA	NR	NA	Each Batch//Monthly	Grab	
Duration of Discharge ¹ 81381	Days	----	----	NA	Record	NA	Each Batch//Monthly	Grab	
Flow, Maximum during 24 hr period 24476	gpd	NA	20,000	NA	Daily Flow	NA	Each Batch//Monthly	Grab	
Flow Rate, Instantaneous 0058	gpm	NA	NA	NA	NR	40 ²	Each Batch//Monthly	Instantaneous	
pH (Day of Sampling) ³ 00400	S.U.	NA	NA	NA	NR	6.0 to 10.0	Each Batch//Monthly	RDS	
Total Suspended Solids 00536	mg/l	----	125	NA	NR	NA	Each Batch//Monthly	Grab	

Table A Footnotes and Remarks:

Footnotes:

¹For this parameter the Permittee shall maintain at the facility a daily record of the volume of wastewater in each storage tank as well as the daily flow discharged to the sanitary sewer. For a BOD concentration exceeding 375 lbs per holding tank, the flow rate shall be controlled to meet the BOD Maximum Daily Limit. For multiple-day discharges, the Permittee shall report the Maximum Daily Flow of the first day of discharge only and submit an attachment detailing the total number of days of discharge and volumes discharged per day.

²Instantaneous flow may be further restricted by MDC if required to prevent surcharging of sewer laterals, sewer conveyances, or pump stations.

³For this parameter the Permittee shall report the pH value taken after treatment and prior to discharge.

⁴Calculated based on (Daily flow, MGD)x(BOD5 concentration, mg/l)x8.345 = BOD5, lbs/day.

Remarks:

1. Sampling and testing of the discharge shall be conducted during any time that a discharge occurs and shall be reported on a DMR (see Section 5C) monthly October through April.

- (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 operate the wastewater collection system and control the discharge of wastewaters authorized herein in accordance with the Operations Plan, February 2001 prepared for United Parcel by Leggette, Brashears & Graham, Inc. (LB & G, Inc.) and supplemental information from LB & G, Inc. dated April 4, 2001, and May 9, 2001, as recertified by George Frigon, P.E., Dames & Moore Group, on February 18, 2011 or as subsequently modified or approved by the Commissioner in writing.

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. 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 (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".
- (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 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.

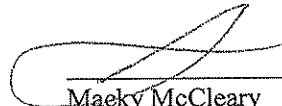
SECTION 7: COMPLIANCE CONDITIONS

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 not a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Discretionary:** Any 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

3/19/14


Maeky McCleary
Deputy Commissioner

cc: MDC Windsor/Poquonock WPCF

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: United Parcel Service

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0002365 APPLICATION # 201101030

<u>Mailing Address:</u> United Parcel Service, Inc.	<u>Location Address:</u> Bradley International Airport Hangar 85-179
Street: Bradley International Airport, Hangar 85-179	Street: Schoephoester Road
City: Windsor Locks ST: CT Zip: 06096	City: Windsor Locks ST: CT Zip: 06096
Contact Name: Mike Kowalski	Contact Name: Mike Kowalski
Phone No.: (860) 386-3262	Phone No.: (860) 386-3262

PERMIT INFORMATION

DURATION 5 YEAR ___ 10 YEAR X 30 YEAR

TYPE New ___ Reissuance X Modification ___

CATEGORIZATION POINT (X) NON-POINT () GIS # 7160

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) ___
PRETREAT CATEGORICAL (CIU) ___

POLLUTION PREVENTION MANDATE ___ ENVIRONMENTAL EQUITY ISSUE

COMPLIANCE SCHEDULE YES ___ NO X

POLLUTION PREVENTION ___ TREATMENT REQUIREMENT ___ WATER CONSERVATION

WATER QUALITY REQUIREMENT ___ REMEDIATION ___ OTHER

OWNERSHIP CODE

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

DEEP STAFF: Donald Gonyea

PERMIT FEES

<i>Discharge Code</i>	<i>DSN Number</i>	<i>Annual Fee</i>
5080000	DSN001	\$2,912.50

FOR SEWER DISCHARGES

Discharge is directed to the MDC Windsor/Poquonock WPCF via its collection system. The facility ID of the POTW is 164-001.

NATURE OF BUSINESS GENERATING DISCHARGE

Stormwater is contaminated to varying degrees (depending on the nature of a given storm event) by the deicing of UPS cargo aircraft within the Hanger ramp area. The most concentrated propylene glycol/stormwater mixture is collected by a specially designed collection vehicle and transferred to DOT's main reprocessing facilities located near the terminal area. The more dilute concentrations of this mixture are directed to a 20,000 gallon above ground storage tank (AST-2) and, if necessary, to onsite frac tank(s) if the holding capacity of the storage tank is reached. Each batch (i.e. contents of AST-2) is tested to determine the concentration of propylene glycol, COD, BOD, and TSS; the results of the COD and propylene glycol testing will be used to give an accurate estimate of the BOD concentration. That value will in turn be used to determine the maximum daily volume which can be discharged to the sanitary sewer to insure compliance with the permit's limits and within the loading capacity allocated to UPS for this discharge by the MDC Windsor/Poquonock WPCF. UPS will utilize a programmable flow meter to control the operating time of the discharge pump which, at its 30 gpm rate capacity, will limit the volume discharged to stay within the maximum daily mass BOD limit of 375 lbs/day.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

Treatment provided consists of pH neutralization of wastewater in the holding tank, as needed, using caustic soda. Following treatment, the wastewater is discharged to the sanitary sewer via controlled metering.

RESOURCES USED TO DRAFT PERMIT

- Department File Information
- Other – Temporary Authorization No. TA0000143 issued to UPS on 2/22/98

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- Best Available Technology (BAT)
- Best Professional Judgment (See General Comments)
- Case by Case Determination (See General Comments)

GENERAL COMMENTS:

The methodology for monitoring and interpreting COD and propylene glycol concentrations as analogues for BOD have been discussed and agreed upon with MDC, UPS and DEEP.