

PRETREATMENT PERMIT

issued to

The United Tool and Die Company  
One Carney Road  
West Hartford, CT 06110

Location Address:

One Carney Road  
West Hartford, CT

**Permit ID:** SP0000039

**Permit Expires:** \_\_\_\_\_

**SECTION 1: GENERAL PROVISIONS**

- (A) This permit is reissued in accordance with section 22a-430(e) 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) The United Tool and Die Company, ("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, 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.

## 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 (Table A) means a limit is not specified but a value must be reported on the Discharge Monitoring Report ("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 each separate volume of wastewater processed through the approved treatment system.

"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" ("GSA") means the arithmetic average of all grab sample analyses. Grab samples shall be collected just prior to discharge from each tank 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.

"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 DECISION

- (A) The Commissioner has made a final determination and found that continued use 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. 201207405 for permit reissuance received on December 3, 2012 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT REISSUANCE], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000039, issued by the Commissioner to the Permittee on June 3 2008, the previous application submitted by the Permittee on November 16, 2007, 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. SP0000039, issued by the Commissioner to the Permittee on June 3, 2008.
- (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] 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. SP0000039, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 201207405 received by the Department on December 3, 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. SP0000039, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].
- (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 the specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

**Table A**

<b>Discharge Serial Number: 201-1</b>					<b>Monitoring Location: 1</b>			
<b>Wastewater Description: Treated metal finishing rinsewaters, acid/alkaline cleaning rinsewaters, fluorescent penetrant inspection and dip brazing rinsewaters, heat treat quench wastewaters, tumbling and vapor blasting wastewaters</b>								
<b>Monitoring Location Description: At the effluent monitoring flume</b>								
<b>Discharge is to: The Metropolitan District Commission Hartford Water Pollution Control Facility via the Sanitary Sewer System in the Town of West Hartford</b>								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency <sup>2</sup>	Sample Type or measurement to be reported
Aluminum, Total	mg/l	----	----	Twice per month	Daily Composite	NA	NR	NA
Cadmium, Total	mg/l	0.07	0.11	Semi-Annually	Daily Composite	0.16	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	Grab
Copper, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	Grab
Cyanide, Total	mg/l	0.65	1.2	Semi-Annually	GSA	1.2	NR	Grab
Flow, Average Daily <sup>1</sup>	gpd	4,500	NA	Continuously/ Monthly	Daily Flow	NA	NR	NA
Flow, Maximum Daily <sup>1</sup>	gpd	NA	8,000	Continuously/ Monthly	Daily Flow	NA	NR	NA
Flow, Day of Sampling	gpd	NA	8,000	Twice per month	Daily Flow	NA	NR	NA
Lead, Total	mg/l	0.1	0.5	Semi-Annually	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-10.0	Twice per month	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuously/ Monthly	Continuously/ Monthly
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuously/ Monthly	Continuously/ Monthly
Silver, Total	mg/l	0.1	0.43	Semi-Annually	Daily Composite	0.64	NR	Grab
Total Suspended Solids	mg/l	NA	----	Quarterly	Daily Composite	NA	NR	NA
Total Toxic Organics <sup>3</sup>	mg/l	NA	NA	NR	NA	2.13	Quarterly	Grab
Zinc, Total	mg/l	1.0	2.0	Twice per month	Daily Composite	3.0	NR	Grab
<b>Table Footnotes and Remarks:</b>								
<b>Footnotes:</b>								
<sup>1</sup> 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.								
<sup>2</sup> 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'.								
<sup>3</sup> See Section 5, paragraph G.								

- (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.

#### 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 Bureau of Materials Management and Compliance Assurance 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 (e.g. 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 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 DMRs ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at [deep.netdmr@ct.gov](mailto: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](http://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 (30<sup>th</sup>) 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 the 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](mailto: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 Metropolitan District Commission ("MDC"), which is involved in the collection and treatment of the permitted discharge. Copies of the DMRs should be sent by e-mail to [DMRs@themdc.com](mailto:DMRs@themdc.com).

(G) For Total Toxic Organics ("TTO") monitoring, in accordance with section 22a-430-4(l) of the RCSA and 40 CFR 433 (Metal Finishing Point Source Category), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. This certification statement shall be as follows:

*"Based on my inquiry of the person or persons responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report which required such certification. I further certify that this facility is implementing the solvent management plan approved by the Commissioner."*

**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 thirty (30) days of the exceedance.

(B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the MDC 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 twenty-four (24) hours of becoming aware of the violation.
- (D) If analysis of any sample of DSN 201-1 indicates a total suspended solids concentration of greater than 600.0 mg/l, the Permittee shall notify the MDC within twenty-four (24) hours of becoming aware of the result.

## 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 (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 biochemical oxygen demand, total suspended solids or 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 the 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

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Macky McCleary  
Deputy Commissioner  
Department of Energy and Environmental Protection

MM/MVM

cc: The Metropolitan District Commission Hartford Water Pollution Control Facility

# DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: The United Tool and Die Company

## PERMIT, ADDRESS, AND FACILITY DATA

PERMIT No.: SP0000039

APPLICATION No.: 201207405

<u>Mailing Address:</u> Street: One Carney Road City: West Hartford ST: CT Zip: 06110 Contact Name: Matt Moir Phone No.: (860) 246-6531 Email: mmoir@utdco.com	<u>Location Address:</u> Street: One Carney Road City: West Hartford ST: CT Zip: 06110 <b>DMR Contact</b> Matt Moir Phone No.: (860) 246-6531 Email: mmoir@utdco.com
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### PERMIT INFORMATION

**DURATION** 5 YEAR  10 YEAR  30 YEAR   
**TYPE** New  Reissuance  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)   
PRETREAT SIGNIFICANT INDUS USER (SIU)   
PRETREAT CATEGORICAL (CIU)   
POLLUTION PREVENTION MANDATE  ENVIRONMENTAL EQUITY ISSUE

### SOLVENT MANAGEMENT PLAN

Is the facility operating under an approved solvent management plan? YES  NO   
Approved on: September 10, 2013

### COMPLIANCE ISSUES

COMPLIANCE SCHEDULE YES  NO

IS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? NO  YES   
See *Other Comments*.

### OWNERSHIP CODE

Private  Federal  State  Municipal (town only)  Other public

**DEEP STAFF ENGINEER** Mariana Miller

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**PERMIT FEES**

Discharge Code	DSN Number	Annual Fee
501035Y	201-1	\$4,337.50

**FOR SEWER DISCHARGES**

Discharge to the Metropolitan District Commission (“MDC”) Hartford POTW via the sanitary sewer system in the town of West Hartford sanitary sewer system. The facility I.D. number of the POTW is 064-001.

**NATURE OF BUSINESS GENERATING DISCHARGE**

The United Tool and Die Company performs chemical etching, vapor blasting/tumbling, dip brazing, quenching, and quality control testing for customers in the aerospace industry.

**PROCESS AND TREATMENT DESCRIPTION (by DSN)**

DSN 001-1: The wastewaters discharged at this outfall are generated by metal finishing operations and are treated through a batch treatment system. The onsite wastewater treatment system consists of filter membrane treatment, pH adjustment, solids settling, and sludge dewatering. Typically, one batch is discharged per day at 4,500 gallons per batch.

**RESOURCES USED TO DRAFT PERMIT**

- Federal Effluent Limitation Guideline 40 CFR 403 and 40 CFR 433  
General Pretreatment and Metal Finishing
- Performance Standards
- Federal Development Document
- Treatability Manual
- Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy
- Coastal Management Consistency Review Form (See *Other Comments*)
- Other - Explain

**BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS**

- Pretreatment Standards for New Sources (“PSNS”)
- Case-by-Case Determination using Best Professional Judgment (“BPJ”) (See *Other Comments*)
- Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”)

Parameter	Case-by-Case using BPJ	Section 22a-430-4(s) of the RCSA	PSNS
Cadmium, Total; AML, MDL		X	
Cadmium, Total; MIL	X		
Chromium, Total; AML, MDL, MIL		X	
Copper, Total; AML, MDL, MIL		X	
Cyanide, Total; AML, MDL		X	
Cyanide, Total; MIL	X		
Lead, Total; AML, MDL, MIL		X	
Nickel, Total; AML, MDL, MIL		X	
pH	X		
Silver, Total; AML		X	
Silver, Total; MDL			X
Silver, Total; MIL	X		
TTO; MIL			X
Zinc, Total; AML, MDL, MIL		X	

AML: Average Monthly Limit, MDL: Maximum Daily Limit, MIL: Maximum Instantaneous Limit

#### GENERAL COMMENTS

In developing the permit's concentration limits, EPA Metal Finishing Categorical Limits (40 CFR 433) and section 22a-430-4(s)(2) of the RCSA limits were compared. Except as noted above, the Connecticut limits were found to be more stringent and thus incorporated in the permit.

The pH limits of 6.0-10.0 S.U. are considered to be protective of sanitary sewer systems.

#### OTHER COMMENTS

This facility is subject to PSNS under 40 CFR 433 because operations at this site began in 1988. The previous permit and fact sheet indicated that the limits were based on 40 CFR 433, Pretreatment Standards for Existing Sources ("PSES"), which was in error.

The United Tool and Die Company currently has other wastewater discharges covered under the *General Permit for the Discharge of Minor Boiler Blowdown Wastewater*, the *General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater*, and the *General Permit for the Discharge of Stormwater Associated with Industrial Activity*.

The United Tool and Die Company rents out a portion of the building to the University of Hartford. The University's American Society of Mechanical Engineers chapter constructs a racecar that is entered in an annual competition. Used oil that is generated is barreled and hauled away. No wastewaters are generated nor directed to the on-site wastewater treatment system.

The Waste Engineering and Enforcement Division ("WEED") issued Consent Order No. WSWDH12008 to The United Tool and Die Company on September 11, 2012. The company was found to be operating as a large quantity generator with the following violations: failure to perform and/or document hazardous waste determinations for all PERMIT No. SP0000039

process wastes generated on-site; failure to determine total halogen content of used oils generated on-site; failure to provide DEEP with copies of manifests; failure to properly package and label universal waste lamps and batteries; failure to date hazardous waste containers; failure to perform and/or record inspections over two 3-week periods; failure to provide a copy of the contingency plan to local emergency response authorities; and failure to include a description of emergency response equipment in the contingency plan. During WPED's site visit on July 31, 2013, the company explained that currently a Supplementary Environmental Project ("SEP") is being funded. In addition, all violations have been corrected, and the company is working with Robert Isner and Michelle Gore from WEED to close out the consent order. It is predicted that the order will be closed in April 2014.

Previously, the average monthly, maximum daily and maximum instantaneous limits set for cadmium were 0.1 mg/l, 0.5 mg/l, and 0.75 mg/l, respectively. However, in accordance with section 22a-430-4(s)(2)(1) of the RCSA, average monthly and maximum daily limits of 0.07 mg/l and 0.11 mg/l, respectively, apply to discharges subject to PSNS. The MIL was then calculated by multiplying the MDL by a factor of 1.5. In order to remain conservative, the calculated value was rounded to 0.16 mg/l.

The MIL for cyanide was carried over from the previous permit.

The previous permit included an MIL of 0.65 mg/l for silver. For this permit, the calculated MIL value  $((0.43 \text{ mg/l}) * (1.5))$  was rounded to 0.64 mg/l in order to remain conservative.

On September 18, 2013, correspondence was received from The Metropolitan District Commission Hartford Water Pollution Control Facility with the following comment:

- The United Tool and Die Company should be aware that the discharge is also subject to MDC ordinance discharge requirements. Specifically, the MDC discharge limitation for Total Suspended Solids is 600 ppm. We request that this information is provided in the permit Data Tracking and Technical Fact Sheet and that the MDC shall be notified if this limit is exceeded.

Section 6(D) has been added to the permit requiring that The United Tool and Die Company notify the MDC if analysis of any sample indicates a total suspended solids concentration of greater than 600.0 mg/l. The MDC shall be notified within twenty-four (24) hours of the company becoming aware of the sample results.

The Metropolitan District Commission Hartford Water Pollution Control Facility confirmed its approval with the permit conditions on October 4, 2013.