

## NPDES PERMIT

issued to

Erickson Metals Corporation  
25 Knotter Drive  
Cheshire, CT 06410

**Location Address:**

25 Knotter Drive  
Cheshire, CT 06410

**Facility ID:** 025-072

**Permit ID:** CT0025267

**Receiving Stream:** Unnamed Tributary to Judd Brook  
(Ten Mile River Watershed)

**Permit Expires:** July 25, 2011

### 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 section 402(b) of the Clean Water Act, as amended, 33 USC 1251, et. seq., and pursuant to an approval dated September 26, 1973, by the Administrator of the United States Environmental Protection Agency for the State of Connecticut to administer an N.P.D.E.S. permit program.
- (B) **Erickson Metals Corporation**, ("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)(10)(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.
- (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. 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) No provision of this permit and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by the Permittee pursuant to this permit will result in compliance or prevent or abate pollution.
- (G) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (H) 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, except for "No observable acute effect level (NOAEL)" which is redefined below.

(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.

"Critical Test Concentration (CTC)" means the specified effluent dilution at which the Permittee is to conduct a single-concentration Aquatic Toxicity test.

"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.

"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".

"No Observable Acute Effect Level (NOAEL)" means any concentration equal to or less than the critical test concentration in a single concentration (pass/fail) toxicity test conducted pursuant to section 22a-430-3(j)(7)(A)(i) RCSA demonstrating 90% or greater survival of test organisms at the CTC.

"Semi-Annual" in the context of a sampling frequency, means the sample must be collected in the months of April and October.

"ug/l" means microgram per liter.

### SECTION 3: COMMISSIONER'S DECISION

- (A) The Commissioner of Environmental Protection ("Commissioner") has issued a final determination and found that continuance of the existing discharge will not cause pollution of the waters of the state. The Commissioner's decision is based on **Application No. 200001678** for permit reissuance received on May 23, 2000 and the administrative record established in the processing of that application.
- (B) The Commissioner hereby authorizes the Permittee to discharge in accordance with the provisions of this permit, the above referenced application, and all approvals issued by the Commissioner or the Commissioner's authorized agent for the discharges and/or activities authorized by, or associated with, this permit.
- (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 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: GENERAL EFFLUENT LIMITATIONS

- (A) No discharge shall contain, or cause in the receiving stream, a visible oil sheen or floating solids; or, cause visible discoloration or foaming in the receiving stream.
- (B) No discharge shall cause acute or chronic toxicity in the receiving water body beyond any zone of influence specifically allocated to that discharge in this permit.
- (C) The temperature of any discharge shall not increase the temperature of the receiving stream above 85°F, or, in any case, raise the normal temperature of the receiving stream more than 4°F.

**SECTION 5: SPECIFIC 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									
Discharge Serial Number (DSN): 001-1					Monitoring Location: 1				
Wastewater Description: Non-contact cooling water									
Monitoring Location Description: Outfall to the unnamed stream to Judd Brook									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test <sup>6</sup>
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency	Sample Type or measurement to be reported	
Acute Aquatic Toxicity, Daphnia Pulex <sup>1</sup> (NOAEL>100%)	%	NA	> 90% Survival Rate	Annual <sup>8</sup>	Composite <sup>5</sup>	> 90% Survival Rate	NR	Grab Sample	
Acute Aquatic Toxicity, Pimephales Promelas <sup>1</sup> (NOAEL>100%)	%	NA	> 90% Survival Rate	Annual <sup>8</sup>	Composite <sup>5</sup>	> 90% Survival Rate	NR	Grab Sample	
Chronic Aquatic Toxicity, Cerio Daphnia Dubia <sup>2</sup> (NOAEL>100%)	%	NA	> 90% Survival Rate	Annual <sup>9</sup>	Composite <sup>5</sup>	> 90% Survival Rate	NR	Grab Sample	
Chronic Aquatic Toxicity, Pimephales Promelas <sup>2</sup> (NOAEL>100%)	%	NA	> 90% Survival Rate	Annual <sup>9</sup>	Composite <sup>5</sup>	> 90% Survival Rate	NR	Grab Sample	
Flow, Maximum Daily <sup>3</sup>	gpd	NA	48,000	Daily / Monthly	Composite <sup>5</sup>	NA	NR	NA	
Aluminum, Total	mg/l	0.071	0.142	Four times/year <sup>7</sup>	Composite <sup>5</sup>	0.21	NR	Grab Sample	+
Copper, Total	mg/l	0.005	0.013	Four times/year <sup>7</sup>	Composite <sup>5</sup>	0.015	NR	Grab Sample	+
Lead, Total	mg/l	0.001	0.002	Four times/year <sup>7</sup>	Composite <sup>5</sup>	0.003	NR	Grab Sample	+
Nickel, Total	mg/l	0.024	0.048	Four times/year <sup>7</sup>	Composite <sup>5</sup>	0.072	NR	Grab Sample	+
Zinc, Total	mg/l	0.032	0.064	Four times/year <sup>7</sup>	Composite <sup>5</sup>	0.096	NR	Grab Sample	+
Chlorine, Total Residual	mg/l	NA	NA	NR	NA	0.027	Four times/year <sup>7</sup>	Grab Sample <sup>10</sup>	+
Nitrogen, Ammonia Total (as N)	mg/l	1.02	2.0	Four times/year <sup>7</sup>	Composite <sup>5</sup>	3.0	NR	Grab Sample	
Iron, Total	mg/l	NA	5.0	Four times/year <sup>7</sup>	Composite <sup>5</sup>	7.5	NR	Grab Sample	
Oil & Grease, Total	mg/l	NA	NA	NR	NA	5.0	Four times/year <sup>7</sup>	Grab Sample <sup>10</sup>	
Total Dissolved Solids (TDS)	mg/l	NA	1500	Four times/year <sup>7</sup>	Composite <sup>5</sup>	NA	NR	NA	

Total Suspended Solids (TSS)	mg/l	NA	----	Four times/year <sup>7</sup>	Composite <sup>5</sup>	NA	NR	NA	
Temperature <sup>4</sup>	°F	NA	NA	NR	NA	85	Daily/Monthly	Grab Sample <sup>10</sup>	
pH, day of sampling	S.U.	NA	NA	NR	NA	6.0 – 9.0	Four times/year <sup>7</sup>	Grab Sample <sup>10</sup>	

**Table Footnotes and Remarks:**

**Footnotes:**

Note: All analysis shall be on the same sample.

<sup>1</sup> The results of the Toxicity Tests are recorded in % survival based on criteria in Section 6(B) of this permit.

<sup>2</sup> The results of the Toxicity Tests are recorded in % survival based on criteria in Section 6(C)(8) of this permit.

<sup>3</sup> 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 Maximum Daily Flow for each month.

<sup>4</sup> For this parameter the permittee shall maintain at the facility a record of the temperature for each day of discharge and shall report the Maximum instantaneous temperature for each month.

<sup>5</sup> For the purpose of this permit "Composite" is defined as follows: three equal volume of grab samples shall be collected every two (2) hours on the day of sample collection and combined to form the composite.

<sup>6</sup> Minimum Level Test refers to Section 6 Paragraph (A) of this permit.

<sup>7</sup> For the purpose of this permit, "Four times/year" in the context of a sampling frequency, means sampling is required in the months of April, August, October and December.

<sup>8</sup> Annual in the context of any sampling frequency found in Section 5(A), shall mean the sample must be collected in the month of April.

<sup>9</sup> Annual in the context of any sampling frequency found in Section 5(A), shall mean the sample must be collected in the month of August.

<sup>10</sup> Grab Samples shall be collected at least once every four (4) hours over a full operating day for as long as a discharge exists on that day (minimum of two grab samples per day).

- (1) All samples shall be comprised of only the wastewater described in this table. Samples shall be collected prior to combination with receiving waters or wastewater of any other type, and after all approved treatment units, if applicable. All samples collected shall be representative of the discharge during standard operating conditions.
- (2) In cases where limits and sample type are specified but sampling is not required by this permit, the limits specified shall apply to all samples, which may be collected and analyzed by the Department of Environmental Protection personnel, the Permittee, or other parties.
- (3) The limits imposed on the discharges listed in this permit take effect on the issuance date of this permit, hence any sample taken after this date which, upon analysis, shows an exceedance of permit limits will be considered non-compliance.
- (4) The monitoring requirements begin on the date of issuance of this permit if the issuance date is on or before the 12<sup>th</sup> day of a month. For permits issued on or after the 13<sup>th</sup> day of a month, monitoring requirements begin the 1<sup>st</sup> day of the following month.

**SECTION 6: SAMPLE COLLECTION, HANDLING and ANALYTICAL TECHNIQUES**

(A) Chemical Analysis

- (1) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved pursuant to the Code of Federal Regulations, Part 136 of Title 40 (40 CFR 136) unless an alternative method has been approved in writing pursuant to 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.
- (2) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR 136 unless otherwise specified.
- (3) The Minimum Levels specified below represent the concentrations at which quantification must be achieved and verified during the chemical analyses for the parameters identified in Section 5 Table A. Analyses for these parameters must include check standards within ten percent of the specified Minimum Level or calibration points equal to or less than the specified Minimum Level.

<u>Parameter</u>	<u>Minimum Level</u>
Aluminum	10.0 ug/L
Chlorine, total residual	20.0 ug/L
Copper	5.0 ug/L
Lead	5.0 ug/L
Nickel	5.0 ug/L
Zinc	10.0 ug/L

- (4) The value of each parameter for which monitoring is required under this permit shall be reported to the maximum level of accuracy and precision possible consistent with the requirements of this section of the permit.
- (5) Effluent analyses for which quantification was verified during the analysis at or below the minimum levels specified in this section and which indicate that a parameter was not detected shall be reported as "less than x" where 'x' is the numerical value equivalent to the analytical method detection limit for that analysis.
- (6) Results of effluent analyses which indicate that a parameter was not present at a concentration greater than or equal to the Minimum Level specified for that analysis shall be considered equivalent to zero (0.0) for purposes of determining compliance with effluent limitations or conditions specified in this permit.

(B) Acute Aquatic Toxicity Test

- (1) Samples for monitoring of Aquatic Toxicity shall be collected and handled as prescribed in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012).
  - (a) Grab samples shall be chilled immediately following collection. Samples shall be held at 4 degrees Centigrade until Aquatic Toxicity testing is initiated.
  - (b) Effluent samples shall not be dechlorinated, filtered, or, modified in any way, prior to testing for Aquatic Toxicity unless specifically approved in writing by the Commissioner for monitoring at this facility.
  - (c) Chemical analyses of the parameters identified in Section 5 Table A shall be conducted on an aliquot of the same sample tested for Aquatic Toxicity.
    - (i) At a minimum, pH, specific conductance, total alkalinity, total hardness, and total residual chlorine shall be measured in the effluent sample and, during Aquatic Toxicity tests, in the highest concentration of test solution and in the dilution (control) water at the beginning of the test and at test termination. If Total Residual Chlorine is not detected at test initiation, it does not need to be measured at test termination. Dissolved oxygen, pH, and temperature shall be measured in the control and all test concentrations at the beginning of the test, daily thereafter, and at test termination. Salinity shall be measured in each test concentration at the beginning of the test and at test termination.
  - (d) Tests for Aquatic Toxicity shall be initiated within 24 hours of sample collection.
- (2) Monitoring for Aquatic Toxicity to determine compliance with the permit limit on Aquatic Toxicity (invertebrate) above shall be conducted for 48-hours utilizing neonatal Daphnia pulex (less than 24-hours old)
- (3) Monitoring for Aquatic Toxicity to determine compliance with the permit limit on Aquatic



Toxicity (vertebrate) above shall be conducted for 48-hours utilizing larval Pimephales promelas (1-14 days old with no more than 24-hours range in age).

- (4) Tests for Aquatic Toxicity shall be conducted as prescribed for static non-renewal acute tests in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012), except as specified below.
  - (a) For Aquatic Toxicity Limits expressed as an NOAEL value, Pass/Fail (single-concentration) tests shall be conducted at a specified Critical Test Concentration (CTC) equal to the Aquatic Toxicity Limit of 100%, as prescribed in section 22A-430-3(j)(7)(A)(i) of the Regulations of Connecticut State Agencies.
    - (b) Organisms shall not be fed during the tests.
    - (c) Copper nitrate shall be used as the reference toxicant in tests with freshwater organisms.
    - (d) Synthetic freshwater prepared with deionized water adjusted to a hardness of 50 mg/L (plus or minus 5 mg/L) as CaCO<sub>3</sub> shall be used as dilution water in tests with freshwater organisms.
- (5) Compliance with limits on Acute Aquatic Toxicity shall be determined as follows:
  - (a) For limits expressed as an NOAEL value, compliance shall be demonstrated when the results of a valid pass/fail Aquatic Toxicity test indicates there is 90% or greater survival in the undiluted effluent.
- (C) The Permittee shall annually monitor the chronic toxicity of the DSN001-1 in accordance with the following specifications.
  - (1) Chronic toxicity testing of the discharge shall be conducted annually during August each year.
  - (2) Chronic toxicity testing shall be performed on the discharge in accordance with the test methodology established in "Short term Methods For Estimating The Chronic Toxicity of Effluents and Receiving Water to Freshwater Organisms" (EPA-821-R-02-012) as referenced in 40 CFR 136 for Cerio daphnia survival and reproduction and Fathead Minnow larval survival and growth.
  - (3) Single concentration static renewal chronic toxicity test shall be performed on the discharge and undiluted site water (Judd Brook) and laboratory control water.
  - (4) Judd Brook water collected immediately upstream of the area influenced by the discharge shall be used as site water control (0% effluent) and dilution water in the toxicity tests.
  - (5) A laboratory water control consisting of synthetic freshwater prepared in accordance with EPA-821-R-02-012 at a hardness of 50 ± 5 mg/l shall be included in the test protocol in addition to the site-water control.
  - (6) Composite samples of the discharge and grab samples of the Judd Brook River for use as site water control and dilution water shall be collected on: day 0, for test solution renewal

on day 1 and day 2 of the test; day 2, for test solution renewal on day 3 and day 4 of the test; and day 4, for test solution renewal on day 5, 6, and 7 of the test. Samples shall not be dechlorinated, pH or hardness adjusted, or chemically altered in any way.

- (7) All samples of the discharge and the Judd Brook River water used in the chronic toxicity test shall, at a minimum, be analyzed and results reported in accordance with the provisions listed in section 6(A) of this permit for the following parameters:

pH	Copper (Total recoverable and dissolved)
Hardness	Nickel (Total recoverable and dissolved)
Alkalinity	Nitrogen, Ammonia (total as N)
Conductivity	Nitrogen, Nitrate (Total as N)
Chlorine, (Total residual)	Lead (Total recoverable and dissolved)
Solids, Total Suspended	Zinc, (Total recoverable and dissolved)
Iron, (Total recoverable and dissolved)	Aluminum, (Total recoverable and

dissolved)

- (8) Compliance with the aquatic toxicity limit specified in section 5(A) shall be demonstrated when the 48 hour results of a valid chronic toxicity test in which lab control test organisms survival exceeds 90% for all replicates combined and the discharge demonstrates no significant increase in mortality of the test organisms exposed to the discharge in comparison to those exposed to the lab control water as indicated by a one trail test at an alpha level of 0.05.

## SECTION 7: REPORTING REQUIREMENTS

- (A) The results of chemical analyses and any aquatic toxicity test 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 (Attn: DMR Processing) 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 collected.

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

- (B) Complete and accurate aquatic toxicity test data, including percent survival of test organisms in each replicate test chamber, LC50 values and 95% confidence intervals for definitive test protocols, and all supporting chemical/physical measurements performed in association with any aquatic toxicity test, including measured daily flow and hours of operation for the 30 consecutive operating days prior to sample collection if compliance with a limit on Aquatic Toxicity is based on toxicity limits based on actual flows described in Section 7, shall be entered on the Aquatic Toxicity Monitoring Report form (ATMR) and sent to the Bureau of Water Protection and Land Reuse at the following address:

Bureau of Water Protection and Land Reuse (Attn: Aquatic Toxicity)  
 Connecticut Department of Environmental Protection  
 79 Elm Street  
 Hartford, CT 06106-5127

- (C) 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 and ATMR, 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.

- (D) A complete and thorough report of the results of the chronic toxicity monitoring specified in Section 6 (C) shall be prepared as outlined in section 10 of EPA-821-R-02-012 and submitted to the Department for review on or before December 31 of each calendar year to the address the provisions specified in Section 7(B) of this permit.

**SECTION 8: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS**

- (A) If any sample analysis indicates that an Aquatic Toxicity effluent limitation in Section 5 of this permit has been exceeded, or that the test was invalid, another sample of the effluent shall be collected and tested for Aquatic Toxicity and associated chemical parameters, as described above in Section 5 and Section 6, and the results reported to the Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing), at the address listed above, within 30 days of the exceedance or invalid test. Results of all tests, whether valid or invalid, shall be reported.
- (B) If any two consecutive test results or any three test results in a twelve month period indicates that an Aquatic Toxicity Limit has been exceeded, the Permittee shall immediately take all reasonable steps to eliminate toxicity wherever possible and shall submit a report to Bureau of Water Protection and Land Reuse (Attn: Aquatic Toxicity) for the review and approval of the Commissioner in accordance with section 22a-430-3(j)(10)(c) of the RCSA describing proposed steps to eliminate the toxic impact of the discharge on the receiving water body. Such a report shall include a proposed time schedule to accomplish toxicity reduction and the Permittee shall comply with any schedule approved by the Commissioner.
- (C) The Permittee shall notify the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division, within 72 hours and in writing within thirty days of the discharge of any substance listed in the application but not listed in the permit if the concentration or quantity of that substance exceeds two times the level listed in the application.

This permit is hereby issued on 7/26/06.

/s/GINA MCCARTHY  
Gina McCarthy  
Commissioner

## DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Erickson Metals Corporation

PAMS Company ID: 4177

**PERMIT, ADDRESS, AND FACILITY DATA**

PERMIT #: CT0025267

APPLICATION #: 200001678

FACILITY ID: 025-072

<b><u>Mailing Address:</u></b>			<b><u>Location Address:</u></b>		
Street: 25 Knotter Drive			Street: 25 Knotter Drive		
City: Cheshire	ST.: CT	Zip: 06410	City: Cheshire	ST.: CT	Zip: 06410
Contact Name: Mr. Raymond L. Roberts			DMR Contact: Mr. Raymond L. Roberts		
Phone No.: 203-272-2918			Phone No.: 203-272-2918		

**PERMIT INFORMATION**

DURATION    5 YEAR  X                     10 YEAR                       30 YEAR   

TYPE            New               Reissuance  X             Modification   

CATEGORIZATION    POINT (X)    NON-POINT ( )            GIS #  248 

NPDES (X)    PRETREAT ( )    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)   

Note: If it's a CIU then check off SIU

POLLUTION PREVENTION MANDATE

ENVIRONMENTAL EQUITY ISSUE

**COMPLIANCE SCHEDULE** YES

NO

POLLUTION PREVENTION  TREATMENT REQUIREMENT  WATER CONSERVATION

WATER QUALITY REQUIREMENT  REMEDIATION  OTHER

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

**OWNERSHIP CODE**

Private  Federal  State  Municipal (town only)  Other public

DEP STAFF ENGINEER: Barak Brako Frempong

**PERMIT FEES**

Discharge Code	DSN	Annual Fee
102000a	001-1	\$ 525.00

Note : Annual fee 50% increase applied.

**FOR NPDES DISCHARGES**

Drainage basin Code: 5202

Present/Future Water Quality Standard: B / B

**NATURE OF BUSINESS GENERATING DISCHARGE**

Erickson Metals Corporation rolls sheets of aluminum to customer thickness and temper specifications; provide services of slitting, rolling and annealing of metal. The process used generates non-contact cooling water from cooling various equipment including mill oil cooling heat exchanger motor and control room air conditioner, anneal furnace heat exchanger coils and hydraulic unit heat exchanger.

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

The discharge is non-contact cooling water and does not require treatment prior to discharge. The water used for the process, and non-contact cooling water comes from an on-site well.

**RESOURCES USED TO DRAFT PERMIT**

- Federal Effluent Limitation Guideline 40 CFR  
name of category
- 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 (See Other Comments)  
DSN001-1: pH, Total Aluminum, Total Copper, Total Lead, Total Nickel, Total Zinc,  
Total  
Ammonia, Total Residual Chlorine, Total suspended Solids (TSS),  
Temperature  
and Total Iron {used section 22a-430-4(s) as a guide for iron}.
- In order to meet in-stream water quality (See General Comments).

## **GENERAL COMMENTS**

Water quality based discharge limitations were included in this permit for consistency with Connecticut Water Quality Standards and criteria, pursuant to 40 CFR 122.44(d). Each parameter was evaluated for consistency with the available aquatic life criteria (acute and chronic) and human health (fish consumption only) criteria, considering the zone of influence allocated to the facility where appropriate. The statistical procedures outlined in the EPA Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001) were employed to calculate the limits. The most restrictive of the water quality limitations, aquatic life acute, aquatic life chronic, and human health, was compared with limitations developed according to State and Federal Best Available Technology (BAT). Where the water quality based limitations were more restrictive than BAT, the water quality based limitation was included in the permit as a concentration limit in addition to the BAT concentration limit. In this case, there are no BAT limits per state or federal categorical regulations.

## **OTHER COMMENTS**

This permit contains effluent limitations consistent with a Case-by-Case Determination using the criteria of Best Professional Judgment as noted above. A review of historical DMR data and reports of effluent analysis showed that the permittee can meet the permit limits without treatment.

The previous permit limits were based on the non-contact cooling water general permit assuming a 10:1 dilution. The actual discharge location is to a small unnamed tributary to Judd Brook with a zone of influence of zero gallon per hour. Therefore, the limits for the parameters are adjusted to reflect water quality criteria at the end of the pipe.

The previous permit did not include certain parameters. Specifically, aluminum, iron, total suspended solids, and temperature. However, based on water quality concerns and for the species habitat in that vicinity, the DEP has included limits for those pollutants listed in previous sentence that are used at the facility.

This application was the subject of a public notice published in Hartford Courant on December 9, 2005. In response to comments from the applicant the Department has subsequently proposed to increase the maximum daily flow from 40,000 to 48,000 gallons per day, and modify the effluent limitations and monitoring requirements for aquatic toxicity.