



March 10, 2015

Ronald Merancy, Chairman
Water Pollution Control Authority
Borough of Naugatuck
229 Church Street
Naugatuck, CT 06770

Re: February 2015 Monthly Operating Report

Dear Mr. Merancy:

Enclosed please find Veolia Water's Monthly Operating Report for the month of February 2015.

Please contact me at the address below if you have any questions about this report.

Sincerely,
Veolia Water North America – Northeast, LLC

A handwritten signature in cursive script that reads "John Batorski".

John Batorski
Plant Manager
Veolia Water Naugatuck

cc: WPCA members: Rimas Balsys, Catherine Aresta, Pat Mallane, Jeffrey Hanson, James R. Stewart PE, LS, Director of Public Works, Borough of Naugatuck, Kathleen Luvisi, Senior Environmental Engineer, Alternative Resources, Inc.

(enclosure)

**Borough of Naugatuck
Monthly WPCF Report February 2015**

This report summarizes the activities at the Borough POTW for February 2015:

1. Highlights and Significant Issues: Please refer to the report.

2. Collection System Update:

Please see attached Collections Report.

3. Plant Performance Summary:

Please see the attached reports and graphs for additional performance details.

Plant Process Data	Limit	Actual
Total Suspended Solids (mg/l)		
Influent Avg.	-	202
Effluent Avg.	30	6
Removal Efficiency	85%	97%
Plant Process Data*	Limit	Actual
Carbonaceous BOD (mg/l)		
Influent Avg.	-	136
Eff Avg(Nov 1 – May 31)	25	4
Eff Avg(June – Oct 31)	15	
Removal Efficiency	85%	97%

Discharge Permit Exceedance: None

	Naugatuck	Middlebury	Oxford	OTR
Feb Flow Avg. (MGD)	4.7	0.446	0.035	N/A
Sludge Liquid Total (MGal)				3845.9
Sludge Cake Total (Wet Tons)				4127.0
Septage Total (MGal)	14,500	7,000	38,250	78,850
Discharge Permit Exceedance: None				

Safety Incidents and Odor Complaints

	Month	YTD
Recordable Accidents	0	0
Lost Time Accidents	0	0
Odor Complaints	0	0
Unconfirmed Odor Complaints	0	0

1. Compliance & Regulatory Issues

- a. There were no odor complaints in February.
- b. Wright Pierce has reviewed the Ash Lagoon Management Plan (copy is in this report) and determined it complies with the new NPDES permit. It will be sent to CTDEEP upon acceptance by the Borough.
- c. On Feb. 11, 2015 a meeting was held at CTDEEP to discuss the incinerator emission upgrade deadline.

2. Personnel

- a. No report.

3. Health & Safety

- a. Monthly safety meetings were held.

4. Operational Information

- a. An incinerator shutdown has been scheduled for March 6, 2015.
- b. The incinerator exhaust duct was opened up twice this month to remove ash deposits. Ash deposits were removed from the heat exchanger and the exhaust duct.

Borough of Naugatuck
Monthly WPCF Report February 2015

- c. Cleaning is scheduled on March 9th or 10th for main 20,000 gallon fuel tank.
- d. An incinerator work list has been developed and will be reviewed/ revised with the staff.

5. Collections

- a. A new manhole was installed new 84 Hilltop (there was no manhole near the area to remove roots that grew near that homes lateral (pass through).
- b. A sewer line break on Birch Lane caused sanitary waste to enter a storm sewer. Repairs were scheduled and CTDEEP and Veolia notifications were processed (pass through).
- c. A sewer backup on Mallane was caused by a piece of 4 inch PVC pipe hat was lodged in a 6 inch sewer. All appropriate reports were filed.

6. Maintenance

- a. The North J Spin current out for repair is expected back in mid-March.
- b. The primary scrubber odor control system recirculation pump and foul air fan was changed.
- c. The actuator for the ID fan failed (new part to arrive in early March).
- d. Maintenance planning is underway for the incinerator shutdown.
- e. A pressure switch was replaced on the wet well level control system.

7. Capital Projects

- a. No report.

Borough of Naugatuck
Collections Systems Report
February 2015



Calls for Service	
1	02/03/15 - 49 Pearl rd
2	02/19/15 - Cooks Café
3	02/26/15 - 331 Hillside Ave
4	
5	
6	

This Month
3

Year to Date
18

Calls Caused By Collection System	
1	none
2	
3	
4	

Reason

High Velocity Cleaning			
	Street Name	Date	Footage
1	Pearl Rd 6-338 upstream	2/8/2015	100
2	Irving 9-235 to 9-234	2/12/2015	300
3	Irving 9-234 to 9-233	2/12/2015	300
4	Irving 9-233 to 9-231	2/12/2015	340
5	Irving 9-231 to 9-223	2/12/2015	300
6	Lewis Cir 9-230 to 9-229	2/12/2015	100
7	Lewis Cir 9-229 to 9-228	2/12/2015	112
8	Lewis Cir 9-228 to 9-224	2/12/2015	100
9	Spencer st 9-224 to 9-225	2/12/2015	50
10	Spencer st 9-224 to 9-223A	2/12/2015	120
11	Spencer st 9-223A to 9-223	2/12/2015	185
12	Spencer st 9-223 to 9-222A	2/12/2015	200
13	Hilltop Rd 6-263 to clean out	2/19/2015	250
14	Conrad st 6-264 to 6-263	2/19/2015	275
15	Conrad st 6-263 to 6-262A	2/23/2015	215
16	Conrad st 6-262A to 6-262	2/23/2015	300
17	Conrad st 6-262 to clean out	2/23/2015	115
18	Birch Ln 6-262 to clean out	2/23/2015	175
19	Birch Ln 2-262 to 6-261	2/25/2015	250
20	Birch Ln 6-261 to 6-260	2/25/2015	175
21	Birch Ln 6-260 to Birch / Hilltop int m/h	2/25/2015	220
22	Birch Ln / Hilltop int m/h to downstream no #	2/25/2015	160
23	Birch Ln no # to Birch / Damson int m/h	2/25/2015	100
24	Hilltop Rd 6-259 to Birch / Hilltop int m/h	2/25/2015	305
25	Hillside Ave 6-300 upstream	2/26/2015	130
26			
27			
28			
29			
30			
51			

6 month list
Call for service

This Month
4877 Feet

Year to Date
113154 Feet

Root Treatment			
	Street Name	Type	Footage
1			
2			
3			

This Month	Year to Date
0 Feet	3911 Feet

Video Inspections			
	Street Name	Type	Footage
1	49 Pearl rd 6-338 upstream	cctv	75
2	Park Ave 6-306 towards Millville	cctv	175
3	Birch Ln 6-252A upstream	cctv	50
4	Birch Ln / Hilltop m/h downstream	cctv	200
5			

This Month	Year to Date
500 Feet	4115 Feet

Pump Station Services				
	Work performed	Location	Date	Notes
1	Weekly pump station checks	all 5	2/5/2015	Generator checks
2	Weekly pump station checks	all 5	2/13/2015	Floats cleaned
3	weekly pump station checks	all 5	2/20/2015	Floats cleaned, gen checks and hi wetwell checks
4				
5				
6				
7				

PUMP RUN TIMES		HOURS		
STATION		Pump 1	Pump 2	Pump 3
Inwood	End Reading	271.7	384.8	0.1
	Start Reading	247.9	358.4	0.1
	Hrs Run	23.8	26.4	0

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
MAPLE & MAY	End Reading	3335.6	2602
	Start Reading	3311.5	2580
	Hrs Run	24.1	22

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
Platts Mill	End Reading	4535.9	5687.9
	Start Reading	4492.6	5590.1
	Hrs Run	43.3	97.8

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
Hopbrook	End Reading	1093.7	768
	Start Reading	1086.4	763.6
	Hrs Run	7.3	4.4

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
HORTON HILL	End Reading	7890.8	9672.4
	Start Reading	7849.5	9633.9
	Hrs Run	41.3	38.5

Vac Truck Information

Days out of the plant working		
This Month	YTD	Remaining
10	118	32

Fuel Information	Fuel Cost	Fuel Used			
	\$205.53	63.1	Gallons	YTD Gallons	
			Gallons	990.1	Gallons
			Gallons		
			Gallons	YTD Fuel Cost	
This Months Total	\$205.53	63.1	Gallons	\$3,277.04	

	Mileage		Engine Hours
Month Start	181894.3	Month Start	5430.6
Month End	182517.4	Month End	5465.1
Total	623.1	Total	34.5

Utility Truck Information	Fuel Cost	Fuel Used		
	\$103.31	31.69	Gallons	YTD Gallons
	\$91.79	28.16	Gallons	608.91
	\$90.33	27.05	Gallons	
	\$110.72	31.82	Gallons	YTD Fuel Cost
Monthly Totals:	\$396.15	118.72	Gallons	\$1,724.65

Other tasks and notes

1	02/01/15 - Snow removal from plant all day
2	02/03/15 - Snow removal from all 5 pump stations
3	02/04/15 - Used vac truck to vacuum clogged drains in the thickener basement of the plant
4	02/05/15 - Removed ice damns from pump stations
5	02/06/15 - Vac out and clean Horton Hill pump stations wetwell
6	02/09/15 - Snow removal from plant all day. Got new fittings for Vac Trucks reel.
7	02/10/15 - Snow removal from all 5 pump stations
8	02/11/15 - Vac out and clean Jessie Camiles grease trap. Vac out and clean Hopbrook pump stations wetwell.
9	02/15/15 - Snow removal from plant
10	02/16/15 - Tested generator batteries at all 5 pump stations
11	02/17/15 - All coolant hoses on the generator at Platts Mill were replaced along with new coolant and fittings.
12	02/18/15 - Finished and tested the Platts Mill generator. Serviced the sander on the F-550
13	02/19/15 - Shoveled Horton Hills roof. Unclogged the bottom piping of the sand silo.
14	02/21/15 - Snow removal from plant
15	02/23/15 - Snow removal from all 5 pump stations
16	02/25/15 - Helped unclog the top of the incinerator.
17	02/26/15 - Used the jetter from the Vac Truck to unclog drains underneath the presses in the de-watering room.
18	02/27/15 - G&L was used to dig and replace two broken sewer pipes on Birch Ln. Two separate dig locations.
19	02/28/15 - Continued Birch Ln dig. Fixed the sanitary to storm sewer bypass.
20	



Sent via certified mail #7009 2820 0004 1018 0958 on March 9, 2015

Municipal Wastewater Monitoring Coordinator
Connecticut Department of Environmental Protection
Bureau of Water Management
79 Elm Street
Hartford, CT 06106-5127

March 9, 2015

Re: February 2015 Reports for Naugatuck, CT WPCF, NPDES # CT0100641

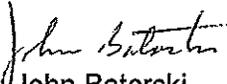
Dear Sir/Madam:

Enclosed please find the *Monthly Operating Report* for February 2015. The *Nutrients Analysis Report for Compliance with General Permit for Nitrogen Discharges* and the *Discharge Monitoring Report* was submitted electronically. There were no exceptions to the reports.

Also enclosed is a summary of sludge sources received at this facility during the month of February 2015.

Please contact me if you have any questions regarding the enclosed revised report.

Sincerely,
Veolia Water North America – Northeast, LLC


John Batorski
Plant Manager

cc: James R. Stewart PE, LS, Director of Public Works, Borough of Naugatuck
(Enclosure)

Page 3 of 3 of MOR for Naugatuck WPCF

Units	Total N		mg/l	Monthly	Low D.O.	pH		Total P		Total P	Ortho P		Temp.		Arsenic	Copper	Nickel	Selenium	Zinc	Alkalinity	
	Inf.	Prim Final Eff.				Inf.	Final Eff.	Inf.	Prim Final Eff.		Inf.	Final Eff.	Inf.	Final Eff.						Pri. Eff.	Eff.
Freq	mg/l	lb/d	lb/d	lb/d	mg/l	mg/l	mg/l	mg/l	mg/l	lb/d	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/day	kg/d	kg/d	kg/d
1																					
2	35.9	27.6	4.4	187	7.8	7.4	6.6	4.80	7.10	303	2.00	7.10	53.4	64.8	<0.004	0.011	0.32	0.04	2.008	80	40
3	32.8		4.8	180	7.8	7.5	6.5	7.29	271			7.20	53.8	64.8						120	30
4	35.4		5.3	221	7.7	7.4	6.5					54.9	64.9							120	30
5					7.4	7.5	6.5					54.5	65.3							110	40
6					7.6	7.5	6.6					12.8	65.3							100	40
7																					
8																					
9	39.8		5.4	212	8.0	7.5	6.7		7.00	276		7.00	54.9	61.5	<0.004		0.28	0.04	1.873	110	40
10	39.3		5.0	196	8.2	7.5	6.8		7.00	274		6.75	55.8	62.1						110	40
11	35.4		4.6	176	7.9	7.6	6.7					56.5	62.2							140	30
12					7.8	7.5	6.7					56.5	62.8							120	40
13					8.0	7.6	6.7					54.7	60.6							130	30
14																					
15																					
16	36.4		6.7	263	7.8	7.6	6.6		9.41	368		9.00	55.2	60.1	<0.004		0.21	0.03	1.510	120	60
17	31.5		6.5	255	7.6	7.6	6.6		9.69	377		9.40	54.7	63.9						120	50
18	32.0		5.2	199	8.4	7.6	6.7					55.2	63.5							110	60
19					7.9	7.5	6.7					56.7	66.2							110	70
20					7.6	7.5	6.6					55.0	63.5							100	60
21																					
22																					
23	29.8		7.1	272	7.8	7.7	6.6		7.22	274		7.20	54.3	65.3	<0.004		0.20	0.03	1.650	100	40
24	31.4		5.5	216	7.7	6.9	6.6		7.43	291		6.85	54.1	65.5						130	40
25	33.9		5.8	232	7.5	7.6	6.6					55.6	66.6							140	40
26					7.9	7.5	6.7					53.4	65.7							130	40
27					7.8	7.6	6.6					54.5	66.2							140	40
28																					
Total																					
Ave	34.5	27.6	5.5	217	7.8	7.5	6.6	4.80	7.77	304	2.00	7.56	54.9	64.0	0.004	0.011	0.25	0.04	1.760	117	43

Sludge Disposal Location:

Please return forms to:

DEEP - Water Bureau

ATTN: Municipal Wastewater Monitoring Coordinator

Municipal Facilities

79 Elm Street

Statement of Acknowledgement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Authorized Official:

John Batorski

Title: t

Plant Manager

Signature: *John Batorski*

Date: 3-9-15

Feb. 2015 Sludge Source Summary

Originator	Gallons	Wet tons
Milbar Laboratories	6,500	27.11
Southern CT Gas	26,000	27.11
New Rochelle	5,976	1,508.72
Cranston RI - VES	3,957	59.80
Danbury Cake - VES		22.61
Seymour Cake - VES		118.24
Casella - Chicopee		317.60
Casella - Glen Cove		233.96
Casella - Huntington		200.71
Casella - Poughkeepsie		167.2
Casella - Suffolk		784.24
Casella - Yorktown Heights		43.61
Bristol		616.13
North Canaan	39,000	
Bedford Hills - VES	26,000	
North Haven - VES	104,000	
Pepsi - VES	6,500	
Poughkeepsie - VES	402,500	
Redding - VES	6,500	
Southbury - IBM	117,000	
Beacon Falls Treatment	110,500	
Heritage Village Water	71,500	
Litchfield	45,500	
Pawling	104,000	
Plymouth	84,500	
Thomaston Treatment	52,000	
Torrington	363,640	
Windham	234,000	
Salisbury	91,000	
Mahopac Sludge & Septic	324,000	
Ansonia - Synagro	45,500	
Bridgeport - East - Synagro	45,500	
Bridgeport - West - Synagro	109,000	
New Canaan - Synagro	19,500	
Ridgefield - Synagro	26,000	
Stratford	767,000	
Lynwood Place	26,000	
Southbury Car wash	26,000	
Westport	108,347	
New Hartford	65,000	
Fairfield	26,000	
Southington	357,500	
Total	3,845,920	4,127

DMR Copy of Record

Permit: C70100641
Permit #: Yes
Major: 001 External Outfall
Permitted Feature: From 02/01/15 to 02/28/15
Report Dates & Status: NetDMR Validated
Monitoring Period: 03/15/15
Considerations for Form Completion:

Facility: NAUGATUCK BOROUGH OF
Facility Location: 500 CHERRY STREET, NAUGATUCK, CT 06770
Permittee: NAUGATUCK WPCF
Permittee Address: 500 CHERRY STREET, NAUGATUCK, CT 06770
Discharge: 001-1 SANITARY SEWAGE
DMR Due Date: 03/15/15
Status: NetDMR Validated

Plant Manager: JOHN Batorski
Title: Plant Manager
Telephone: 203-723-1433

Code	Parameter Name	Monitoring Location	Season	Param. NODI	Qualifier	Value 1	Qualifier	Value 2	Units	Qualifier	Value 1	Qualifier	Value 2	Units	Qualifier	Value 3	Units	# of Frequency of Analysis Ex.	Sample Type
0050	Flow rate	1 - Effluent Gross	0	-	4.7	0	03 MGD											9999 - Continuous	TM - TOTAL
0050	Oxygen, dissolved [DO]	1 - Effluent Gross	0	-	7.4	>	5 INST MIN											9999 - Continuous	TM - TOTAL
0010	BOD, 5-day, 20 deg. C	T - See Comments	1	-	0	>	5 INST MIN											0101 - Daily	GR - GRAB
0040	pH	1 - Effluent Gross	0	-	8.5	>	0 INST MIN											0101 - Daily	GR - GRAB
0030	Solids, total suspended	1 - Effluent Gross	0	-	5.6	<	30 MO AVG	<										0307 - Three Per Week	CP - COMPOS
0030	Solids, total suspended	G - Raw Sewage Influent	0	-	201.9	=	Rec Mon MO AVG											0307 - Three Per Week	CP - COMPOS
0050	Solids, total suspended	T - See Comments	1	-	0.3	<	25 MO AVG											0307 - Three Per Week	CP - COMPOS
00510	Nitrogen, ammonia total [ae N]	1 - Effluent Gross	4	-														0150 - Quarterly	CP - COMPOS
00510	Nitrogen, ammonia total [ae N]	T - See Comments	1	-														0307 - Three Per Week	CP - COMPOS
00515	Nitrogen, nitrite total [ae N]	T - See Comments	1	-														0150 - Quarterly	CP - COMPOS

Sent electronically 3-9-15 John Batorski

01081 Lead, total [as Pb]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD	0.25	0.32	01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/90 - Quarterly	CP - COMPOS
01089 Thallium, total [as Tl]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD	2.14 MO AVG	3.94 DAILY MX	01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/90 - Quarterly	CP - COMPOS
01087 Nickel, total [as Ni]	1 - Effluent Gross	0	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/07 - Weekly	CP - COMPOS
01087 Nickel, total [as Ni]	C - Raw Sewage Influent	0	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/07 - Weekly	CP - COMPOS
01087 Nickel, total [as Ni]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/07 - Weekly	CP - COMPOS
01077 Silver, total [as Ag]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/00 - Quarterly	CP - COMPOS
01092 Zinc, total [as Zn]	1 - Effluent Gross	0	Permit Req. Value NOD	Sample Permit Req. Value NOD	1.76	2.01	01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/90 - Quarterly	CP - COMPOS
01092 Zinc, total [as Zn]	C - Raw Sewage Influent	0	Permit Req. Value NOD	Sample Permit Req. Value NOD	3.79 MO AVG	5.68 DAILY MX	01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/07 - Weekly	CP - COMPOS
01092 Zinc, total [as Zn]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/07 - Weekly	CP - COMPOS
01087 Antimony, total [as Sb]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/07 - Weekly	CP - COMPOS
01105 Aluminum, total [as Al]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/00 - Quarterly	CP - COMPOS
01147 Selenium, total [as Se]	1 - Effluent Gross	0	Permit Req. Value NOD	Sample Permit Req. Value NOD	0.04	0.04	01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/00 - Quarterly	CP - COMPOS
01147 Selenium, total [as Se]	C - Raw Sewage Influent	0	Permit Req. Value NOD	Sample Permit Req. Value NOD	35.10 AVG	75 DAILY MX	01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/07 - Weekly	CP - COMPOS
01147 Selenium, total [as Se]	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD	0.13		01-lqld	Opt Mon DAILY MX	9 - Conditional Monitoring - Not Required This Period	19 - mg/L	01/07 - Weekly	CP - COMPOS
46000 Phenols	T - See Comments	1	Permit Req. Value NOD	Sample Permit Req. Value NOD							01/00 - Quarterly	CP - COMPOS

5000 Chlorine, total residual

T - See Comments 1

7100 Mercury, total (as Hg)

T - See Comments 1

80120 BOD, carbonaceous, 5 day, 5 C

1 - Effluent Gross 0

80120 BOD, carbonaceous, 5 day, 5 C

Q - Raw Sewage Influent 0

80120 BOD, carbonaceous, 5 day, 5 C

T - See Comments 1

81011 Solids, suspended percent removal

K - Percent Removal 0

81935 Carbonaceous oxygen demand, % removal

K - Percent Removal 0

TDAD3D-Nasal Static-48hr Acute D. Pulex

T - See Comments 1

TDAD3D-Nasal Static-48hr Acute Pinephouse

T - See Comments 1

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

No attachments.

Attachments

Report Last Saved By

NAUGATUCK WPCF

User: John.Batorski@Veoliawatema.com

Name: John Batorski

E-Mail: John.Batorski@Veoliawatema.com

Req. Value	Permit Value	Sample Value	Permit Rec.	Sample Rec.	Units	Frequency	Monitoring	Compos
19 - mg/L					19 - mg/L	Quarterly	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
10 - mg/L					10 - mg/L	Quarterly	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
19 - mg/L					19 - mg/L	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
19 - mg/L					19 - mg/L	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
19 - mg/L					19 - mg/L	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
19 - mg/L					19 - mg/L	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
19 - mg/L					19 - mg/L	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
23 - %					23 - %	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CA - CALCTD
23 - %					23 - %	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CA - CALCTD
23 - %					23 - %	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CA - CALCTD
23 - %					23 - %	Three Per Week	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CA - CALCTD
27 - % survival					27 - % survival	Quarterly	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS
27 - % survival					27 - % survival	Quarterly	Opt Mon DAILY MX 9 - Conditional Monitoring - Not Required This Period	CP - COMPOS

Date/Time: 2015-03-09 08:04 (Time Zone: -04:00)

Key:

1)	Indicates additions and/or changes to old permit
2.) NA	- Indicates parameters that are sampled on site (no additional cost)

Old Permit Table A - Final Effluent

Parameter	Frequency	Price/Test	Price/Year
Alkalinity	Monthly	NA	NA
CBOD5 (Nov. 1 - May 31st)	12/month	\$ 14.00	\$ 1,176.00
CBOD5 (June 1st - Oct. 31st)	12/month	\$ 14.00	\$ 840.00
Cadium, Total	Monthly	\$ 6.00	\$ 72.00
Chlorine, Total Residual (May 1st - Sept. 30)	4/workday	NA	NA
Copper, Total	Weekly	\$ 6.00	\$ 312.00
Fecal Coliform (May 1st - Sept. 30th)	12/month	\$ 14.00	\$ 840.00
Flow, Average	Continuous	NA	NA
Nitrogen, Ammonia (Nov. 1st - April 30th)	12/month	\$ 11.00	\$ 792.00
Nitrogen, Ammonia (May)	12/month	\$ 11.00	\$ 132.00
Nitrogen, Ammonia (June)	12/month	\$ 11.00	\$ 132.00
Nitrogen, Ammonia (July 1 - Sept. 30)	12/month	\$ 11.00	\$ 396.00
Nitrogen, Ammonia (October)	12/month	\$ 11.00	\$ 132.00
Nitrogen, Nitrate	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Nitrite	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Total Kjeldahl	Monthly	\$ 17.00	\$ 204.00
Nitrogen, Total	Monthly	\$ 17.00	\$ 204.00
Oxygen, Dissolved	Workday	NA	NA
pH	Workday	NA	NA
Phosphate, Ortho	Monthly	\$ 8.00	\$ 96.00
Phosphorous, Total	Monthly	\$ 12.00	\$ 144.00
Silver, Total	Monthly	NA	NA
Solids, Settleable	Weekly	NA	NA
Solids, Total Suspended	12/month	\$ 8.00	\$ 1,152.00
Temperature	Workday	NA	NA
Zinc	Weekly	\$ 6.00	\$ 312.00

Annual Total	\$ 7,104.00
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New Permit Table A - Final Effluent

Parameter	Frequency	Price/Test	Price/Year
Alkalinity	Monthly	NA	NA
Arsenic	Weekly	\$ 6.00	\$ 312.00
CBOD5 (Nov. 1st - May 31st)	3/week	\$ 14.00	\$ 1,176.00
CBOD5 (June 1st - Oct. 31st)	3/week	\$ 14.00	\$ 840.00
Chlorine, (May 1st - Sept. 30th)	4/workday	NA	NA
Copper, Total	Monthly	\$ 6.00	\$ 72.00
Fecal Coliform, (May 1st - September 30th)	3/week	\$ 14.00	\$ 840.00
E. Coli (May 1st - September 30th)***	3/week	\$ 7.00	\$ 420.00
Flow	Continuous	NA	NA
Nickel, Total	Weekly	\$ 6.00	\$ 312.00
Nitrogen, Ammonia (May)	3/week	\$ 11.00	\$ 132.00
Nitrogen, Ammonia (June)	3/week	\$ 11.00	\$ 132.00
Nitrogen Ammonia, (July 1st - Sept. 30th)	3/week	\$ 11.00	\$ 396.00
Nitrogen, Ammonia (October)	3/week	\$ 11.00	\$ 132.00
Nitrogen, Ammonia (Nov. 1st - April 30th)	3/week	\$ 11.00	\$ 792.00
Nitrogen, Nitrate	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Nitrite	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Total Kjeldahl	Monthly	\$ 17.00	\$ 204.00
Nitrogen, Total (mg/L)	Monthly	\$ 17.00	\$ 204.00
Nitrogen, Total (lbs/day)	Monthly	NA	NA
Oxygen, Dissolved	Workday	NA	NA
pH	Workday	NA	NA
Phosphate, Ortho (April 1st - October 31st)	2/Week	\$ 8.00	\$ 448.00
Phosphate, Ortho (Nov. 1st - March 30th)	Monthly	\$ 8.00	\$ 40.00
Phosphorous, Total (April 1st - Oct. 31st)	2/Week	\$ 12.00	\$ 672.00
Phosphorous, Total (Nov. 1st - March 30th)	Monthly	\$ 12.00	\$ 60.00
Phosphorous, Total, lbs/day (April 1st - Oct. 31st) lbs/day	2/week	NA	NA
Phosphorous, Total (Average Seasonal Load Cap.) October, lbs/day	2/week	NA	NA
Selenium, Total	Weekly	\$ 6.00	\$ 312.00
Solids, Settleable	3/week	NA	NA
Solids, Total Suspended	3/week	\$ 8.00	\$ 1,152.00
Temperature	Workday	NA	NA
Turbidity	Workday	NA	NA
Zinc, Total	Weekly	\$ 6.00	\$ 312.00

Annual Total	\$ 8,708.00
--------------	-------------

Effluent Annual Difference	\$ 1,604.00
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***E. Coli testing does not take effect until 900 days after new permit start date (August 21, 2014) thus the cost not reflected at this point in time.

Key:

1.)	Indicates additions and/or changes to old permit
2.) NA	- Indicates parameters that are sampled on site (no additional cost)

Old Permit Table C - Influent

Parameter	Frequency	Price/Test	Price/Year
CBOD5	12/month	\$ 14.00	\$ 2,016.00
Nitrogen, Ammonia	12/month	\$ 11.00	\$ 1,584.00
Nitrogen, Nitrate	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Nitrite	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Kjeldahl	Monthly	\$ 17.00	\$ 204.00
Nitrogen, Total	Monthly	\$ 17.00	\$ 204.00
Phosphorous, Total	Monthly	\$ 12.00	\$ 144.00
pH	NA	NA	NA
Solids, Total Suspended	12/month	\$ 8.00	\$ 1,152.00
Temperature	NA	NA	NA
Annual Total			\$ 5,472.00

New Permit Table E - Influent

Parameter	Frequency	Price/Test	Price/Year
CBOD5	12/month	\$ 14.00	\$ 2,016.00
Arsenic, Total	Weekly	\$ 6.00	\$ 312.00
Nickel, Total	Weekly	\$ 6.00	\$ 312.00
Nitrogen, Ammonia	12/month	\$ 11.00	\$ 1,584.00
Nitrogen, Nitrate	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Nitrite	Monthly	\$ 7.00	\$ 84.00
Nitrogen, Kjeldahl	Monthly	\$ 17.00	\$ 204.00
Nitrogen, Total	Monthly	\$ 17.00	\$ 204.00
Phosphate, Ortho	Monthly	\$ 8.00	\$ 96.00
Phosphorous, Total	Monthly	\$ 12.00	\$ 144.00
pH	NA	NA	NA
Solids, Total Suspended	12/month	\$ 8.00	\$ 1,152.00
Selenium, Total	Weekly	\$ 6.00	\$ 312.00
Temperature	NA	NA	NA
Zinc, Total	Weekly	\$ 6.00	\$ 312.00
Annual Total			\$ 6,816.00

Influent Annual Difference	\$ 1,344.00
----------------------------	-------------

Key:

- | | |
|-----|---|
| 1.) | Indicates additions and/or changes to old permit |
| 2.) | NA - Indicates parameters that are sampled on site (no additional cost) |

New Permit Table G - Ash Lagoon Effluent

Parameter	Frequency	Price/Test	Price/Year
Aluminum, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Arsenic, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Beryllium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Cadmium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Chromium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Copper, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Iron, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Lead, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Mercury, Total	Bi-Monthly	\$ 12.00	\$ 72.00
Nickel, Total	Bi-Monthly	\$ 6.00	\$ 36.00
pH	Bi-Monthly	NA	NA
Selenium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Temperature	Bi-Monthly	NA	NA
Zinc, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Annual Total			\$ 468.00

Ash Lagoon Effluent Annual Difference	\$ 468.00
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Key:

(b)	Indicates additions and/or changes to old permit
2.) NA	- Indicates parameters that are sampled on site (no additional cost)

Old Permit Table B - Toxicity Test

Parameter	Frequency	Price/Test	Price/Year
Antimony, Total	Quarterly	\$ 6.00	\$ 24.00
Arsenic, Total	Quarterly	\$ 6.00	\$ 24.00
Beryllium, Total	Quarterly	\$ 6.00	\$ 24.00
Cadium, Total	Quarterly	\$ 6.00	\$ 24.00
Chromium, Hexavalent	Quarterly	\$ 6.00	\$ 24.00
Chromium, Total	Quarterly	\$ 6.00	\$ 24.00
Chlorine, Total Residual	Quarterly	NA	
Copper, Total	Quarterly	\$ 6.00	\$ 24.00
Cyanide, Amenable	Quarterly	\$ 6.00	\$ 24.00
Lead, Total	Quarterly	\$ 6.00	\$ 24.00
Mercury, Total	Quarterly	\$ 12.00	\$ 48.00
Nickel, Total	Quarterly	\$ 6.00	\$ 24.00
Phenols, Total	Quarterly	\$ 6.00	\$ 24.00
Selenium, Total	Quarterly	\$ 6.00	\$ 24.00
Silver, Total	Quarterly	NA	
Thallium, Total	Quarterly	\$ 6.00	\$ 24.00
Zinc, Total	Quarterly	\$ 6.00	\$ 24.00
Qtrly Total			\$ 384.00

New Permit Table C - Toxicity Test

Parameter	Frequency	Price/Test	Price/Year
Aluminum, Total	Quarterly	\$ 6.00	\$ 24.00
Antimony, Total	Quarterly	\$ 6.00	\$ 24.00
Arsenic, Total	Quarterly	\$ 6.00	\$ 24.00
Beryllium, Total	Quarterly	\$ 6.00	\$ 24.00
BOD5	Quarterly	\$ 14.00	\$ 56.00
Cadium, Total	Quarterly	\$ 6.00	\$ 24.00
Chromium, Hexavalent	Quarterly	\$ 6.00	\$ 24.00
Chromium, Total	Quarterly	\$ 6.00	
Chlorine, Total Residual	Quarterly	NA	
Copper, Total	Quarterly	\$ 6.00	\$ 24.00
Cyanide, Amenable	Quarterly	\$ 6.00	\$ 24.00
Cyanide, Total	Quarterly	\$ 6.00	\$ 24.00
Iron, Total	Quarterly	\$ 6.00	\$ 24.00
Lead, Total	Quarterly	\$ 6.00	\$ 24.00
Mercury, Total	Quarterly	\$ 12.00	\$ 48.00
Nickel, Total	Quarterly	\$ 6.00	\$ 24.00
Nitrogen, Ammonia	Quarterly	\$ 11.00	\$ 44.00
Nitrogen, Nitrate	Quarterly	\$ 7.00	\$ 28.00
Nitrogen, Nitrite	Quarterly	\$ 7.00	\$ 28.00
Phenols, Total	Quarterly	\$ 6.00	\$ 24.00
Phosphorous, Total	Quarterly	\$ 12.00	\$ 48.00
Selenium, Total	Quarterly	\$ 6.00	\$ 24.00
Silver, Total	Quarterly	\$ 6.00	\$ 24.00
Suspended Solids, Total	Quarterly	\$ 8.00	\$ 32.00
Thallium, Total	Quarterly	\$ 6.00	\$ 24.00
Zinc, Total	Quarterly	\$ 6.00	\$ 24.00
Qtrly Total			\$ 668.00

*Toxicity Test annual Difference	\$ 1,136.00
----------------------------------	-------------

Quarterly test cost multiplied by 4 tests.

*Prices subject to change

Key:

- 1.) Indicates additions and/or changes to old permit
 2.) NA - Indicates parameters that are sampled on site (no additional cost)

Old Permit Table E - Dewatered Sludge

Parameter	Frequency	Price/Test	Price/Year
Arsenic, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Beryllium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Cadium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Chromium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Copper, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Lead, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Mercury, Total	Bi-Monthly	\$ 12.00	\$ 72.00
Nickel, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Zinc, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Annual Total			\$ 360.00

New Permit Table H - Dewatered Sludge

Parameter	Frequency	Price/Test	Price/Year
Arsenic, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Beryllium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Cadium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Chromium, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Copper, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Lead, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Mercury, Total	Bi-Monthly	\$ 12.00	\$ 72.00
Nickel, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Nitrogen, Ammonia	Bi-Monthly	\$ 11.00	\$ 66.00
Nitrogen, Nitrate	Bi-Monthly	\$ 7.00	\$ 42.00
Nitrogen, Organic	Bi-Monthly	\$ 22.00	\$ 132.00
Nitrogen, Nitrite	Bi-Monthly	\$ 7.00	\$ 42.00
Nitrogen, Total	Bi-Monthly	\$ 17.00	\$ 102.00
pH	Bi-Monthly	NA	
PCBs	Bi-Monthly	\$ 35.00	\$ 210.00
Selenium	Bi-Monthly	\$ 6.00	\$ 36.00
Solids, Fixed	Bi-Monthly	\$ 10.00	\$ 60.00
Solids, Total	Bi-Monthly	\$ 7.00	\$ 42.00
Solids, Volatile	Bi-Monthly	\$ 10.00	\$ 60.00
Zinc, Total	Bi-Monthly	\$ 6.00	\$ 36.00
Annual Total			\$ 1,152.00

Dewatered Sludge Annual Difference \$ 792.00

Total Annual Additional Amount for New Permit \$ 23,156.00

* * * Communication Result Report (Mar. 2. 2015 9:41AM) * * *

1) Veolia Water-NET LLC
2)

Date/Time: Mar. 2. 2015 9:40AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
5890 Memory TX	18604244067	P. 3	OK	

- Reason for error
- E. 1) Hang up or line fail
 - E. 2) Busy
 - E. 3) No answer
 - E. 4) No facsimile connection
 - E. 5) Exceeded max. E-mail size
 - E. 6) Destination does not support IP-Fax



VEOLIA WATER NORTH AMERICA
800 Clary Street
Hempstead, CT 06439

TEL: 1-203-722-1431 / 800-922-1433
FAX: 1-203-722-8378
veolia@veoliamail.com

Fax

TO *Iland Ayala, CT DEEP*

FAX *860-424-4067*

FROM *Christopher Mahuch
Newington Wastewater Treatment Facility*

DATE *3/2/2015*

PAGES: *3*
including this page

SUBJECT *Bypass Report Millant Lane*

MESSAGE

THIS TRANSMISSION CONTAINS CONFIDENTIAL INFORMATION INTENDED FOR THE USE OF THE ABOVE NAMED RECIPIENT. RECEIVERS OF THIS TRANSMISSION OR ANY PART OF THIS MESSAGE IN ANY MANNER BY ANY MEANS OR THROUGH ANY SYSTEM (INCLUDING BUT NOT LIMITED TO THE INTERNET) FOR THE PURPOSE OF DISSEMINATING IT TO OTHERS, IS STRICTLY PROHIBITED. PLEASE IMMEDIATELY REPORT TO THE SENDER ANY UNAUTHORIZED DISSEMINATION OF THIS MESSAGE TO ANY OTHER PERSON OR ENTITY. YOUR COOPERATION IN THIS MATTER IS APPRECIATED.



STATE OF CONNECTICUT
DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
WATER PROTECTION AND LAND REUSE BUREAU



BYPASS REPORT FORM

City or Town: Naugatuck

Type of Bypass

- Raw Sewage
- Disinfected Raw Sewage
- Partially Treated Sewage
- Disinfected Partially Treated Sewage
- Sludge Spill
- Other: _____

Cause of Bypass

- Weather Conditions _____
- Mechanical Equipment Failure
- Electric Utility Failure
- Electrical Equipment Failure
- Approved Shutdown
- Limited capacity: Dry weather Wet weather

Location of Bypass

- Treatment Plant
- Pump Station
- Manhole, Lateral, Basement
- Main, Private

Blockage of Sewer Line due to:

- Grease, Roots, Other: _____

Exact Location of By-Pass: MH 3-20 Mallane Lane

Date and Time By-Pass was Discovered: 03 / 02 / 2015 9:00 AM/PM

Date and Time By-Pass was Stopped: 03 / 02 / 2015 11:00 AM/PM

How By-Pass was Discovered: Resident called Naugatuck police department

Quantity/Volume of By-Pass: about 1,000 gallons

How Quantity/Volume was Determined: Estimated from visual inspection

If Equipment Failure, date of last inspection, maintenance or repairs: N/A

Receiving Waters (If Applicable) Hop Brook?

Steps taken to minimize volume and duration of By-Pass: Jetting of line

Action taken to eliminate By-Pass: removal of broken piece of 4" pipe in a 6" line

Steps Taken to prevent recurrence of By-Pass: inspection of line with CCTV

Was area of By-Pass cleaned of debris? Yes No

Method Used: Manual labor

Date of Last Blockage / Back up / Surcharge at this location: NO RECORD OF ANY ISSUES

BYPASS NOTIFICATION LOG

Permittee shall notify DEEP within 2 hours of becoming aware of the bypass and shall submit a written report within 5 days.

2
Hours
Notification
Required

DATE/ TIME

 / / CT DEEP - Iliana Raffa (860) 424-3758 (Primary DEEP Contact)
If Iliana Raffa is not available, you must call Municipal Facilities Section at number below:

3/21/15 CT DEEP (860) 424-3704 [(860) 424-3338 (DEEP Emergency Dispatch) only for after hours] DO NOT LEAVE VOICE MAIL MESSAGES

Operator # 214 Name of person contacted
Case # 2015-00871

 / / CT Bureau of Aquaculture (203) 874-0696 Option 2 Monday through Friday 8:00 and 4:30 pm (Required only if bypass is south of Interstate Route 95)

Name of person contacted.
After hours/weekend must refer to call list provided by Bureau of Aquaculture
DO NOT LEAVE VOICE MAIL MESSAGES

 / / CT Dept. of Public Health (860) 509-7333 (Drinking Water Section) notify Monday through Friday 8:30 to 5:00 pm if bypass occurred in following towns: Bristol, Cheshire, Danbury, Goshen, Groton, Hamden, Manchester, Mansfield, Middletown, North Haven, Norwalk, Ridgefield, Shelton, Stamford Vernon, and Woodstock.

 / / _____ Name of person contacted

 / / CT Dept. of Public Health (860) 509-7296 (Recreation Section) notify from Monday through Friday 8:30 to 5:00pm if bypass occurred from April 1st through September 30th.

Name of person contacted

 / / Local Health Department or Regional Health District

Name of person contacted

Naugatuck Valley Health Department 203-881-3259 (fax)

 / / Health Director of Contiguous Towns (Coastal Plants Only) or Health Director of Town Downstream (Inland Plants)

Name of person contacted

 / / Fax to CT DEEP, Iliana Ayala (860) 424-4067

 / / Fax to CT Aquaculture (203) 783-9976 (If south of I-95)

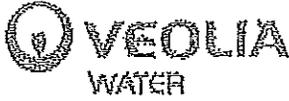
3/21/15 Fax to Local Health Department or Regional Health District 203-881-3259

Report Submitted by: Christopher Malachuk Title: Assistant Plant Manager
Signature: [Signature] Date: 3/21/2015 Phone # 203-723-1433

Submit Completed Report to either by fax or by mail: State of Connecticut, Department of Energy & Environmental Protection, Water Bureau - Attention: Iliana Raffa, 79 Elm Street, Hartford, CT 06106-5127

Rev. 7/27/2011

Facilities
Section
Required
5
Days



VEOLIA WATER NORTH AMERICA
500 Cherry Street
Naugatuck, CT 06770

Tel : 203-723-1433 / 888-662-1433
Fax : 203-723-8539
www.veollawaterma.com

 Fax

TO *Naugatuck Valley Health Department*

FAX *203-881-3259*

FROM *Christopher Malcuch
Naugatuck Wastewater Treatment Facility*

DATE *3/2/2015*

PAGES:
Including this page

SUBJECT *Bypass Report fo Mallane Lane*

MESSAGE



VEOLIA WATER NORTH AMERICA
500 Cherry Street
Naugatuck, CT 06770

Tel : 203-723-1433 / 888-882-1433
Fax : 203-723-8539
www.veoliawatema.com

 Fax

TO *Iland Ayala , CT DEEP*

FAX *860-424-4067*

FROM *Christopher Maluch
Naugatuck Wastewater Treatment Facility*

DATE *3/2/2015*

PAGES: *3*
Including this page

SUBJECT *Bypass Report Mallard Lane*

MESSAGE

Date/Time: Feb. 27. 2015 7:35AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
5873 Memory TX	18604244067	P. 3	OK	

Reason for error

E. 1) Hang up or line fail	E. 2) Busy
E. 3) No answer	E. 4) No facsimile connection
E. 5) Exceeded max. E-mail size	E. 6) Destination does not support IP-Fax



VEOLIA WATER NORTH AMERICA
 500 Cherry Street
 Norwalk, CT 06850
 Tel: 203-724-4250 Fax: 203-724-4255
 www.veoliamna.com

Fax

TO Illana Ruffa
 FAX 860-424-4067
 FROM John Batorski
 DATE 2-27-15 PAGES: 3
 SUBJECT Navigation Collection Bypass

MESSAGE
Attach w.e. Bypass Notification log/Form
for a broken sewer on Birch St, Norwalk
MH 6-252



VEOLIA WATER NORTH AMERICA
500 Cherry Street
Naugatuck, CT 06770

Tel : 203-723-1433 / 888-882-1433
Fax : 203-723-8539
www.veoliawaterma.com

 Fax

TO Iliana Raffa

FAX 860-424-4067

FROM John Batorski

DATE 2-27-15

PAGES: 3
Including this page

SUBJECT Naugatuck Collection Bypass

MESSAGE

Attach is a Bypass Notification Log/Form

for a broken sewer on Birds St., Naugatuck

MH 6-252

BYPASS NOTIFICATION LOG

Permittee shall notify DEEP within 2 hours of becoming aware of the bypass and shall submit a written report within 5 days.

2
Hours
Notification
Required

DATE/TIME

2-27-15 ^{~7:45AM} CT DEEP - Iliana Raffa (860) 424-3758 (Primary DEEP Contact)
If Iliana Raffa is not available, you must call Municipal Facilities Section at number below:

 / / CT DEEP (860) 424-3704 [(860) 424-3338 (DEEP Emergency Dispatch) only for after hours] DO NOT LEAVE VOICE MAIL MESSAGES

_____ Name of person contacted

 / / CT Bureau of Aquaculture (203) 874-0696 Option 2 Monday through Friday 8:00 and 4:30 pm (Required only if bypass is south of Interstate Route 95)

_____ Name of person contacted.

After hours/weekend must refer to call list provided by Bureau of Aquaculture
DO NOT LEAVE VOICE MAIL MESSAGES

 / / CT Dept. of Public Health (860) 509-7333 (Drinking Water Section) notify Monday through Friday 8:30 to 5:00 pm if bypass occurred in following towns: Bristol, Cheshire, Danbury, Goshen, Groton, Hamden, Manchester, Mansfield, Middletown, North Haven, Norwalk, Ridgefield, Shelton, Stamford Vernon, and Woodstock.

_____ Name of person contacted

 / / CT Dept. of Public Health (860) 509-7296 (Recreation Section) notify from Monday through Friday 8:30 to 5:00pm if bypass occurred from April 1st through September 30th.

_____ Name of person contacted

 / / Local Health Department or Regional Health District
_____ Name of person contacted

 / / Health Director of Contiguous Towns (Coastal Plants Only) or Health Director of Town Downstream (Inland Plants)

_____ Name of person contacted

 / / ²⁻²⁷⁻¹⁵ ^{~8AM} Fax to CT DEEP, Iliana Ayala (860) 424-4067

 / / Fax to CT Aquaculture (203) 783-9976 (If south of I-95)

 / / Fax to Local Health Department or Regional Health District

Report Submitted by: John Batorski Title: Plant Manager
Signature: John Batorski Date: 2-27-15 Phone # 203-723-1433 ext. 2015
Submit Completed Report to either by fax or by mail: State of Connecticut, Department of Energy & Environmental Protection, Water Bureau - Attention: Iliana Raffa, 79 Elm Street, Hartford, CT 06106-5127
Rev. 7/27/2011

Final Report
Within 5 Days



DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION
WATER PROTECTION AND LAND REUSE BUREAU



BYPASS REPORT FORM

City or Town: Naugatuck

Type of Bypass

- Raw Sewage
- Disinfected Raw Sewage
- Partially Treated Sewage
- Disinfected Partially Treated Sewage
- Sludge Spill
- Other: _____

Cause of Bypass

- Weather Conditions clear, cold (single digits)
- Mechanical Equipment Failure
- Electric Utility Failure
- Electrical Equipment Failure
- Approved Shutdown
- Limited capacity: Dry weather
 Wet weather

Location of Bypass

- Treatment Plant
- Pump Station
- Manhole, Lateral, Basement
- Main, Private

Blockage of Sewer Line due to:

- Grease, Roots, Other:
- Broken sewer line

Collection System

Exact Location of By-Pass: Near Manhole G-252 & MH G-240, Birch Ln.

Date and Time By-Pass was Discovered: 2 / 26 / 15 2 / AM/PM

Date and Time By-Pass was Stopped: 2 / 27 / 15 6 / AM/PM work is in progress, repair completion is an estimate.

How By-Pass was Discovered: Routine jetting/dye testing observed sanitary sewer leaking into storm water manhole

Quantity/Volume of By-Pass: estimate is 1-2 GPM ~ 1500 to 2000 gal.

How Quantity/Volume was Determined: visual observation confirmed with dye

If Equipment Failure, date of last inspection, maintenance or repairs: 1 / 1 / N/A

Receiving Waters (If Applicable) suspect Hop Brook (nearest stream)

Steps taken to minimize volume and duration of By-Pass: Repaired pipe

Action taken to eliminate By-Pass: CCTV area, replace damaged section of pipe

Steps Taken to prevent recurrence of By-Pass: continue routine sewer inspections/cctv

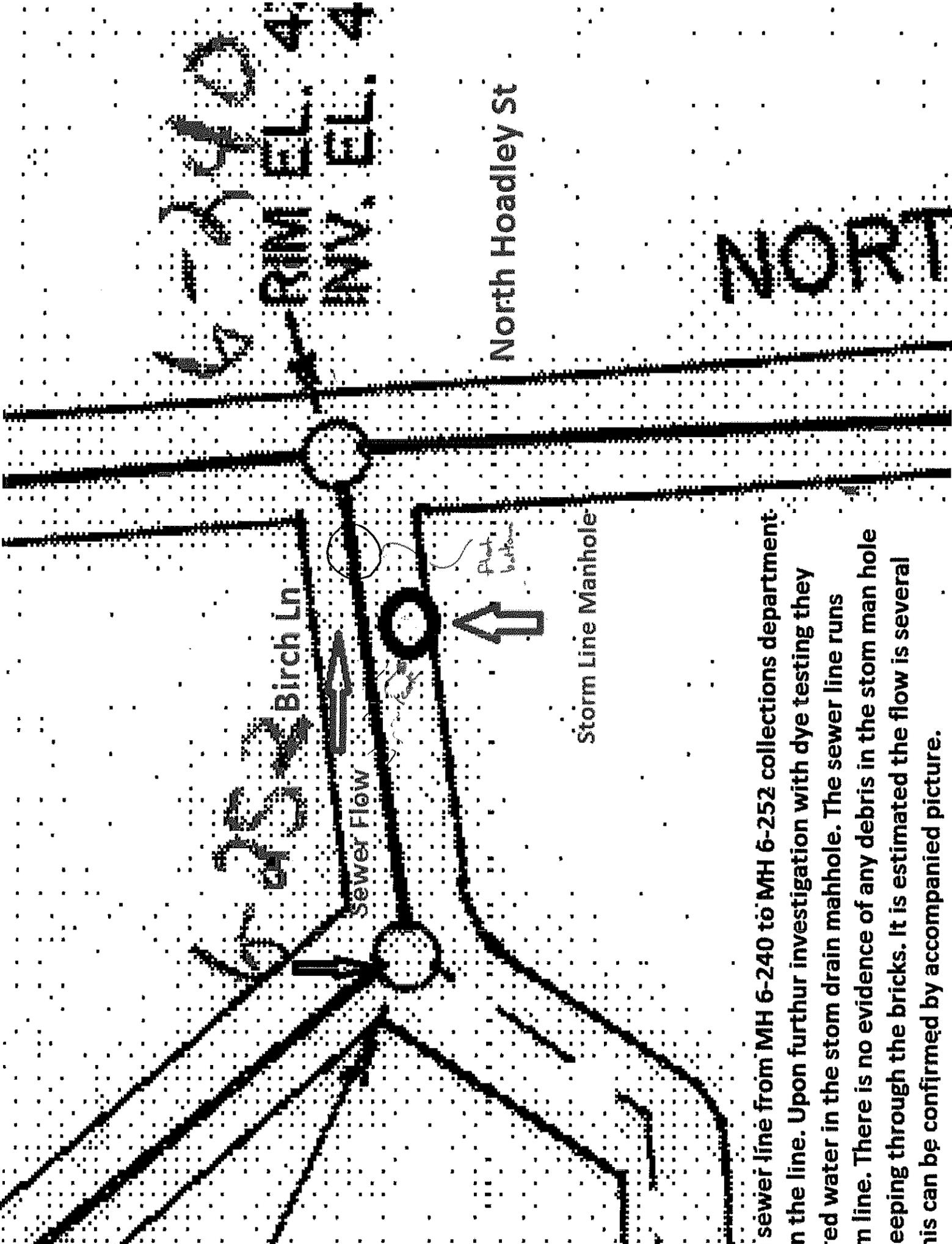
Was area of By-Pass cleaned of debris? Yes No N/A

Method Used: _____

Date of Last Blockage / Back up / Surchage at this location: 9 / 9 / 14

MH-182, broken clay pipe (repaired)

7/27/2011



i sewer line from MH 6-240 to MH 6-252 collections department
 in the line. Upon further investigation with dye testing they
 red water in the stom drain mahhole. The sewer line runs
 m line. There is no evidence of any debris in the stom man hole
 seeping through the bricks. It is estimated the flow is several
 his can be confirmed by accompanied picture.

February 25, 2014
W-P Project No. 13117A

Mr. John Batorski, Project Manager
Veolia Water
500 Cherry Street
Naugatuck, CT 06770

Subject: Naugatuck Water Pollution Control Facility (WPCF)
Review of Ash Lagoon Management Plan for Compliance with
NPDES Permit No. 0100641

Dear John:

As requested, Wright-Pierce has reviewed the Ash Lagoon Management Plan developed by Veolia Water (VW) for the Naugatuck WPCF. On February 12, 2015, Wright-Pierce (W-P) personnel performed a site visit to inspect the lagoons and ash handling facilities. Tom Deller and Natalie Verlezza were present from VW, and Mariusz Jedrychowski, PE, and Amanda Ziegler, PE, represented W-P. At the meeting, W-P and VW staff discussed ash lagoon procedures and permit requirements, and then W-P performed a site inspection of the lagoons and ash handling area.

The following are ash lagoon specific permit requirements, as outlined in Section 10, Paragraph B of the permit, followed by a description of current operations and procedures at the Naugatuck WPCF. A complete copy of NPDES Permit No. 0100641 is included as Attachment A.

(1) Description of best management practices including the dredging of the ash lagoons on a frequency necessary for maintaining them in a good operational condition.

There are two ash lagoons at the Naugatuck WPCF. Each is capable of treating the ash effluent from the incinerator, and lagoons are set up to operate individually. When the Total Suspended Solids (TSS) in the effluent of the operating lagoon reaches approximately 200 mg/L, the lagoon is taken offline and the standby lagoon is put into service. Lagoons are emptied by activating the valves such that the standby lagoon is put online and the active lagoon is closed. The lagoon is then allowed to drain slowly back to the headworks. Once the liquid level drops below the effluent structure, a sump pump is used to pump out the remaining liquid. After the lagoon is emptied, it is dredged, inspected, and repaired if needed. Generally, lagoons are switched and dredged once per year. See Attachment B (Ash Lagoon Management Plan) for further details.

(2) Description of the dewatering and disposal measures of the dredge spoils in accordance with applicable regulations and best management practices.

After a lagoon is taken offline and emptied, it gradually dries out and is dredged. Dredging typically occurs from the edges inward as the edges dry out first. Stockpiled dredged material is piled and allowed



to drain, either in the non-operating lagoon or on the center berm between lagoons. No ash is deposited or stockpiled on the exterior edges of the lagoons; ash is only temporarily piled on the berm between lagoons so runoff is contained within the lagoons. Once drained, ash is moved to the ash lagoon pad, which is an impervious structure adjacent to the lagoon area enclosed by concrete blocks. VW staff sprays water on the ash as needed to eliminate fugitive dust. See Attachment B for further details.

(3) Implementation and maintenance of proper erosion control measures.

The lagoon area has been graded and seeded such that runoff is directed into the lagoons. A silt fence is installed around the perimeter of the lagoons.

The ash lagoon perimeter is graded and sloped to allow any runoff to flow directly into the lagoons. The ash lagoon perimeter is seeded and mowed, with the exception of the loading area. A silt fence along the entire perimeter provides additional protection to contain runoff. The silt fence is inspected and maintained as needed.

(4) Verification that the existing sampling location(s) at the effluent of each ash lagoon is representative of the discharge.

Effluent monitoring is performed at the effluent structure, which provides a representative sample of the effluent. Ash slurry from the incinerator enters the lagoons from the east and effluent structures are located opposite each inlet. This gives maximum retention time in the lagoons for most effective treatment. Flow through the lagoons is slow, which minimizes mixing and encourages particles to settle. See Attachment B for photos showing sampling locations.

The ash lagoon effluent is sampled every Wednesday and samples are sent to the laboratory bi-monthly. Effluent samples are analyzed for the parameters required by Table G of the permit (see Attachment B). A representative laboratory report (included in Attachment C, Laboratory Results) shows the test results. All parameters are included except temperature, pH, and TSS, which are included in the attached "Lab Bench" report (included in Attachment C).

(5) Establishment of a monitoring program in accordance with the requirements of table G monitoring location W included in Attachment B of this permit.

Ash lagoon effluent is sampled every Wednesday. The permit requires sampling to be conducted bi-monthly. Weekly sampling meets and exceeds the permit requirements. Samples are sent to the laboratory every other month for analysis.

Other Considerations

Based upon an incident that occurred on February 14, 2015, a gate and sign will be installed to prevent access to the ash lagoon area.

On February 14, 2015, a trespassing vehicle accessed the lagoon area through the Elm Street entrance. The vehicle continued past numerous signs stating "Authorized Personnel Only" and proceeded into the lagoon area. Although no damage was inflicted and no one was injured in this incident, there are significant hazards in the area and trespassers must be kept out.

Mr. John Batorski
February 25, 2015
Page 3 of 3



There is an existing electric gate along Elm Street that is owned and maintained by Chemtura, but this gate is currently inoperable, which allowed the vehicle to access the ash lagoon area. VW staff will install a cattle gate and sign to ensure the area is more effectively secured.

Based on our review of pertinent information provided by VW, interviews with VW staff, and site visit observations, Wright-Pierce concludes that the Naugatuck WPCF ash lagoon maintenance and sampling plan developed by VW meets the ash lagoon specific requirements outlined in Section 10, paragraph B of Permit No. 0100641.

Please contact us if you have any questions.

Sincerely,
WRIGHT-PIERCE

Mariusz Jedrychowski, P.E.
Senior Project Manager

Amanda E. Ziegler, PE
Project Engineer

ATTACHMENT A
CT NPDES Permit CT0100641



MUNICIPAL NPDES PERMIT

Issued to

Permittee:

Borough of Naugatuck
229 Church Street
Naugatuck, CT 06770

Location Address:

Naugatuck WPCF
500 Cherry Street Ext.
Naugatuck, CT 06770

Facility ID: 088-001 **Permit ID:** CT0100641 **Permit Expires:** 8/20/2019

Receiving Stream: Naugatuck River

Design Flow Rate: 10.3 MGD

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 there under, 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 a N.P.D.E.S. permit program.
- (B) Borough of Naugatuck, ("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. To the extent this permit imposes conditions more stringent than those found in the regulations, this permit shall apply.

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
- (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 or Application Transfer
 - (p) Permit Revocation, Denial or Modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements
 - (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 Section of the 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 permittee shall comply with Section 22a-416-1 through Section 22a-416-10 of the RCSA concerning operator certification.
- (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 RCSA. As of October 1, 2009 the annual fee is **\$3,005.00**.

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 "Composite", "No Observable Acute Effect Level (NOAEL)" and "Grab Sample Average" which are redefined below.
- (B) In addition to the above, the following definitions shall apply to this permit:
- "-----" in the limits column on the monitoring tables in Attachment 1 means a limit is not specified but a value must be reported on the DMR, MOR, and ATMR.
- "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.
- "Bi-Weekly" in the context of any sampling frequency, shall mean once every two weeks.
- "Bi-Monthly" in the context of any sampling frequency, shall mean once every two months including the months of January, March, May, July, September, and November.
- "Composite" or "(C)" means a sample consisting of a minimum of eight aliquot samples collected at equal intervals of no less than 30 minutes and no more than 60 minutes and combined proportionally to flow over the sampling period

provided that during the sampling period the peak hourly flow is experienced.

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

"Daily Composite" or **"(DC)"** means 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, a composite sample continuously collected over a full operating day proportionally to flow.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or, arithmetic average of all grab sample results defining a grab sample average.

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

"Geometric Mean" is the "n"th root of the product of "n" observations.

"Grab Sample Average" is the arithmetic average of all grab sample analyses.

"Infiltration" means water other than wastewater that enters a sewer system (including sewer system and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.

"Inflow" means water other than wastewater that enters a sewer system (including sewer service connections) from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, drains from springs and swampy areas, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, storm waters, surface runoff, street wash waters, or drainage. Inflow does not include, and is distinguished from, infiltration.

"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.

"In-stream Waste Concentration" or **"(IWC)"** means the concentration of a discharge in the receiving water after mixing has occurred in the allocated zone of influence.

"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.

"MGD" means million gallons per day.

"Monthly Minimum Removal Efficiency" means the minimum reduction in the pollutant parameter specified when the effluent average monthly concentration for that parameter is compared to the influent average monthly concentration.

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

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

"No Observable Acute Effect Level" or **"(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) of the RCSA, demonstrating greater than 50% survival of test organisms in 100% (undiluted) effluent and 90% or greater survival of test organisms at the CTC.

"Quarterly" in the context of any sampling frequency, shall mean sampling is required in the months of January, April, July, and October.

"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 pH meters that provide continuous monitoring and recording, Range During Sampling means the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"Range During Month" or "(RDM)" as a sample type means the lowest and the highest values of all of the monitoring data for the reporting month.

"MGD" means million gallons per day.

"Sanitary Sewage" means wastewaters from residential, commercial and industrial sources introduced by direct connection to the sewerage collection system tributary to the treatment works including non-excessive inflow/infiltration sources.

"Twice per Month" in the context of any sampling frequency, means two samples per calendar month collected no less than 12 days apart.

"ug/l" means micrograms per liter

"Work Day" in the context of a sampling frequency means, Monday through Friday excluding holidays.

SECTION 3: COMMISSIONER'S DECISION

- (A) The Commissioner of Environmental Protection ("Commissioner") has issued a final decision and found modification of the existing system would protect the waters of the state from pollution. The Commissioner's decision is based on application no. 200600210 for permit reissuance received on January 31, 2006 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 his 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, if required after Public Notice, 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 LIMITATIONS AND OTHER CONDITIONS

- (A) The Permittee shall not accept any new sources of non-domestic wastewater conveyed to its Publicly Owned Treatment Works (POTW) through its sanitary sewerage system or by any means other than its sanitary sewerage system unless the generator of such wastewater; (a) is authorized by a permit issued by the Commissioner under Section 22a-430 CGS (individual permit), or, (b) is authorized under Section 22a-430b (general permit), or, (c) has been issued an emergency or temporary authorization by the Commissioner under Section 22a-6k. All such non-domestic wastewaters shall be processed by the POTW via receiving facilities at a location and in a manner prescribed by the permittee which are designed to contain and control any unplanned releases.
- (B) No new discharge of domestic sewage from a single source to the POTW in excess of 50,000 gallons per day shall be allowed by the permittee until the permittee has notified in writing the Municipal Facilities Section of said new discharge.
- (C) The permittee shall maintain a system of user charges based on taxes and other fees sufficient to operate and maintain the POTW (including the collection system) and replace critical components.
- (D) The permittee shall maintain a sewer use ordinance that is consistent with the Model Sewer Ordinance for Connecticut Municipalities prepared by the Department of Energy and Environmental Protection. The Commissioner of Energy and Environmental Protection alone may authorize certain discharges which may not conform to the Model Sewer Ordinance.
- (E) No discharge shall contain or cause in the receiving stream a visible oil sheen, floating solids, visible discoloration, or foaming.
- (F) No discharge shall cause acute or chronic toxicity in the receiving water body beyond any Zone Of Influence (ZOI) specifically allocated to that discharge in this permit.
- (G) The permittee shall maintain an alternate power source adequate to provide full operation of all pump stations in the sewerage collection system and to provide a minimum of primary treatment and disinfection at the water pollution control

facility to insure that no discharge of untreated wastewater will occur during a failure of a primary power source.

- (H) The average monthly effluent concentration shall not exceed 15% of the average monthly influent concentration for CBODs and Total Suspended Solids for all daily composite samples taken in any calendar month.
- (I) Any new or increased amount of sanitary sewage discharge to the sewer system is prohibited where it will cause a dry weather overflow or exacerbate an existing dry weather overflow.
- (J) Sludge Conditions
 - (1) The permittee shall comply with all existing federal and state laws and regulations that apply to sewage sludge use and disposal practices, including but not limited to 40 CFR Part 503.
 - (2) If an applicable management practice or numerical limitation for pollutants in sewage sludge more stringent than existing federal and state regulations is promulgated under Section 405(d) of the Clean Water Act (CWA), this permit shall be modified or revoked and reissued to conform to the promulgated regulations.
 - (3) The permittee shall give prior notice to the Commissioner of any change(s) planned in the permittees' sludge use or disposal practice. A change in the permittees' sludge use or disposal practice may be a cause for modification of the permit.
 - (4) Testing for inorganic pollutants shall follow "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", EPA Publication SW-846 as updated and/or revised.
- (K) This permit becomes effective on the 1st day of the month following the date of signature.
- (L) When the arithmetic mean of the average daily flow from the POTW for the previous 180 days exceeds 90% of the design flow rate, the permittee shall develop and submit within one year, for the review and approval of the Commissioner, a plan to accommodate future increases in flow to the plant. This plan shall include a schedule for completing any recommended improvements and a plan for financing the improvements.
- (M) When the arithmetic mean of the average daily CBODs or TSS loading into the POTW for the previous 180 days exceeds 90% of the design load rate, the permittee shall develop and submit for the review of the Commissioner within one year, a plan to accommodate future increases in load to the plant. This plan shall include a schedule for completing any recommended improvements and a plan for financing the improvements.
- (N) On or before July 31st of each calendar year the main flow meter shall be calibrated by an independent contractor in accordance with the manufacturer's specifications. The actual record of the calibration shall be retained onsite and, upon request, the permittee shall submit to the Commissioner a copy of that record.
- (O) The permittee shall operate and maintain all processes as installed in accordance with the approved plans and specifications and as outlined in the associated operation and maintenance manual. This includes but is not limited to all preliminary treatment processes, primary treatment processes, recycle pumping processes, anaerobic treatment processes, anoxic treatment processes, aerobic treatment processes, flocculation processes, effluent filtration processes or any other processes necessary for the optimal removal of pollutants. The permittee shall not bypass or fail to operate any of the aforementioned processes without the written approval of the Commissioner.
- (P) The permittee is hereby authorized to accept septage at the treatment facility or other locations as approved by the Commissioner.
- (Q) The permittee is hereby authorized to accept groundwater remediation wastewaters pumped from extraction wells located at the Chemtura Corporation facility (formerly Uniroyal and Crompton) directly upstream of the primary sedimentation basins at the treatment facility.
- (R) 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.
- (S) The ash lagoon monitoring program described in section 10(A) of this permit shall be initiated on the first day of the month following the approval by the Commissioner of said plan.

SECTION 5: SPECIFIC EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The discharge(s) shall not exceed and shall otherwise conform to the specific terms and conditions listed in this permit. The discharge is restricted by, and shall be monitored in accordance with Tables A through H incorporated in this permit as Attachment 1.
- (B) The Permittee shall monitor the performance of the treatment process in accordance with the Monthly Operating Report (MOR) incorporated in this permit as Attachment 2.

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 or the RCSA 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 Metals, as defined in 40 CFR 136 unless otherwise specified.
- (3) Grab samples shall be taken during the period of the day when the peak hourly flow is normally experienced.
- (4) Samples collected for bacteriological examination shall be collected between the hours of 11 a.m. and 3 p.m. or at that time of day when the peak hourly flow is normally experienced. A chlorine residual sample must be taken at the same time and the results recorded.
- (5) 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 Attachment 1, Tables A through H. 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	0.05 mg/l
Antimony, Total	0.010 mg/l
Arsenic, Total	0.005 mg/l
Beryllium, Total	0.001 mg/l
Cadmium, Total	0.0005 mg/l
Chlorine, Total Residual	0.050 mg/l
Chromium, Total	0.005 mg/l
Chromium, Total Hexavalent	0.010 mg/l
Copper, Total	0.005 mg/l
Cyanide, Total	0.010 mg/l
Iron, Total	0.04 mg/l
Lead, Total	0.005 mg/l
Mercury, Total	0.0002 mg/l
Nickel, Total	0.005 mg/l
Phosphorus, Total	0.10 mg/l
Selenium, Total	0.005 mg/l
Silver, Total	0.002 mg/l
Thallium, Total	0.005 mg/l
Zinc, Total	0.020 mg/l

- (6) 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.
- (7) 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.

- (8) 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 Acute 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) Composite samples shall be chilled as they are collected. Grab samples shall be chilled immediately following collection. Samples shall be held at 0 - 6°C until Acute 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. Facilities with effluent dechlorination and/or filtration designed as part of the treatment process are not required to obtain approval from the Commissioner.
- (c) Samples shall be taken at the final effluent after dechlorination for Acute Aquatic Toxicity unless otherwise approved in writing by the Commissioner for monitoring at this facility.
- (d) Chemical analyses of the parameters identified in Attachment I, Table C shall be conducted on an aliquot of the same sample tested for Acute 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 Acute Aquatic Toxicity tests, in the highest concentration of the test 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.
- (d) Tests for Acute Aquatic Toxicity shall be initiated within 36 hours of sample collection.
- (2) Monitoring for Acute Aquatic Toxicity to determine compliance with the permit limit on Acute Aquatic Toxicity (invertebrate) shall be conducted for 48 hours utilizing neonatal (less than 24 hours old) *Daphnia pulex*.
- (3) Monitoring for Acute Aquatic Toxicity to determine compliance with the permit limit on Acute Aquatic Toxicity (vertebrate) shall be conducted for 48 hours utilizing larval (1 to 14-day old with no more than 24 hours range in age) *Pimephales promelas*.
- (4) Tests for Acute Aquatic Toxicity shall be conducted as prescribed for static non-renewal acute tests in "Methods for measuring the Acute Aquatic Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012), except as specified below.
- (a) For Acute Aquatic Toxicity limits, and for monitoring only conditions, expressed as a NOAEL value, Pass/Fail (single concentration) tests shall be conducted at a specified Critical Test Concentration (CTC) equal to the Aquatic Toxicity limit, (100% in the case of monitoring only conditions), as prescribed in Section 22a-430-3(j)(7)(A)(i) of the RCSA.
- (b) Organisms shall not be fed during the tests.
- (c) Synthetic freshwater prepared with deionized water adjusted to a hardness of 50±5 mg/L as CaCO₃ shall be used as dilution water in the tests.
- (d) Copper nitrate shall be used as the reference toxicant.
- (5) For limits expressed as NOAEL = 100%, compliance shall be demonstrated when the results of a valid pass/fail Acute Aquatic Toxicity Test indicate 90% or greater survival in the effluent sample at the CTC (100%).

(C) Chronic Aquatic Toxicity Test

- (1) Chronic Aquatic Toxicity testing of the discharge shall be conducted annually during July, August, or September of each year.
- (2) Chronic Aquatic 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-02-013) as referenced in 40 CFR 136 for *Ceriodaphnia* survival and reproduction and Fathead minnow larval survival and growth.
 - (a) Chronic Aquatic Toxicity tests shall utilize a minimum of five effluent dilutions prepared using a dilution factor of 0.5 (100% effluent, 50% effluent, 25% effluent, 12.5% effluent, 6.25% effluent).
 - (b) Naugatuck River water collected immediately upstream of the area influenced by the discharge shall be used as control (0% effluent) and dilution water in the toxicity tests.
 - (c) A laboratory water control consisting of synthetic freshwater prepared in accordance with EPA-821-R-02-013 at a hardness of 50±5 mg/l shall be used as an additional control (0% effluent) in the toxicity tests.
 - (d) Daily composite samples of the discharge (final effluent following disinfection) and grab samples of the Naugatuck 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 for the remainder of the test. Samples shall not be pH or hardness adjusted, or chemically altered in any way.
- (3) All samples of the discharge and Naugatuck River water used in the Chronic Aquatic 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 parameters listed in Attachment 1, Table C included herein, excluding Acute Aquatic Toxicity organism testing.

SECTION 7: RECORDING AND REPORTING REQUIREMENTS

- (A) The Permittee and/or the Signatory Authority shall continue to report the results of chemical analyses and any aquatic toxicity test required above in Section 5 and the referenced Attachment 1 by electronic submission of DMRs under this permit to the Department using NetDMR. The report shall include a detailed explanation of any violations of the limitations specified. DMRs shall be submitted electronically to the Department no later than the 15th day of the month following the month in which samples are collected.
 - (1) For composite samples, from other than automatic samplers, the instantaneous flow and the time of each aliquot sample collection shall be recorded and maintained at the POTW.
- (B) Complete and accurate 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, shall be entered on the Aquatic Toxicity Monitoring Report form (ATMR) and sent to the Bureau of Water Protection and Land Reuse at the address specified above in Section 7 (A) of this permit by the 15th day of the month following the month in which samples are collected.
- (C) The results of the process monitoring required above in Section 5 shall be entered on the Monthly Operating Report (MOR) form, included herein as Attachment 2, and reported to the Bureau of Water Protection and Land Reuse. The MOR report shall also be accompanied by a detailed explanation of any violations of the limitations specified. The MOR, must be received at the address specified above in Section 7 (A) of this permit by the 15th day of the month following the month in which the data and samples are collected.
- (D) A complete and thorough report of the results of the chronic toxicity monitoring outlined in Section 6(C) shall be prepared as outlined in Section 10 of EPA-821-R-02-013 and submitted to the Department for review on or before December 31 of each calendar year to the address specified above in Section 7 (A) of this permit.

SECTION 8: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS, BYPASSES, MECHANICAL FAILURES, AND MONITORING EQUIPMENT FAILURES

- (A) If any Acute Aquatic Toxicity sample analysis indicates that an Aquatic toxicity effluent limitation has been exceeded, or that the test was invalid, a second sample of the effluent shall be collected and tested for Acute Aquatic Toxicity and associated chemical parameters, as described above in Section 5 and Section 6, and the results reported to the Bureau of Water Protection and Land Reuse (Attn: Aquatic Toxicity) via the ATMR form (see Section 7 (B)) within 30 days of the previous test. These test results shall also be reported on the next month's DMR report pursuant to Section 7 (A). The results of all toxicity tests and associated chemical parameters, valid and invalid, shall be reported.
- (B) If any two consecutive Acute Aquatic Toxicity test results or any three Acute Aquatic Toxicity test results in a twelve month period indicates that the Acute 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 the Bureau of Water Protection and Land Reuse (Attn: Aquatic Toxicity), for the review and written 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) Section 22a-430-3(k) of the RCSA shall apply in all instances of bypass including a bypass of the treatment plant or a component of the sewage collection system planned during required maintenance. The Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Planning and Standards Division, Municipal Facilities Section (860) 424-3704, the Department of Public Health, Water Supply Section (860) 509-7333 and Recreation Section (860) 509-7297, and the local Director of Health shall be notified within 2 hours of the permittee learning of the event by telephone during normal business hours. If the discharge or bypass occurs outside normal working hours (8:30 a.m. to 4:30 p.m. Monday through Friday), notification shall be made within 2 hours of the permittee learning of the event to the Emergency Response Unit at (860) 424-3338 and the Department of Public Health at (860) 509-8000. A written report shall be submitted to the Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Planning and Standards Division, Municipal Facilities Section within five days of the permittee learning of each occurrence, or potential occurrence, of a discharge or bypass of untreated or partially treated sewage.

The written report shall contain:

- (a) The nature and cause of the bypass, permit violation, treatment component failure, and/or equipment failure,
- (b) The time the incident occurred and the anticipated time which it is expected to continue or, if the condition has been corrected, the duration,
- (c) The estimated volume of the bypass or discharge of partially treated or raw sewage,
- (d) The steps being taken to reduce or minimize the effect on the receiving waters, and
- (e) The steps that will be taken to prevent reoccurrence of the condition in the future.
- (D) Section 22a-430-3(j) 11 (D) of the RCSA shall apply in the event of any noncompliance with a maximum daily limit and/or any noncompliance that is greater than two times any permit limit. The permittee shall notify in the same manner as in paragraph C of this Section, the Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Planning and Standards Division, Municipal Facilities Section except, if the noncompliance occurs outside normal working hours (8:30 a.m. to 4:30 p.m. Monday through Friday) the permittee may wait to make the verbal report until 10:30 am of the next business day after learning of the noncompliance.
- (E) Section 22a-430-3(j) 8 of the RCSA shall apply in all instances of monitoring equipment failures that prevent meeting the requirements in this permit. In the event of any such failure of the monitoring equipment including, but not limited to, loss of refrigeration for an auto-sampler or lab refrigerator or loss of flow proportion sampling ability, the permittee shall notify in the same manner as in paragraph C of this Section, the Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Planning and Standards Division, Municipal Facilities Section except, if the failure occurs outside normal working hours (8:30 a.m. to 4:30 p.m. Monday through Friday) the permittee may wait to make the verbal report until 10:30 am of the next business day after learning of the failure.
- (F) In addition to the reporting requirements contained in Section 22a-430-3(i), (j), and (k) of the Regulations of Connecticut State Agencies, the permittee shall notify in the same manner as in paragraph C of this Section, the Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Planning and Standards Division, Municipal

Facilities Section concerning the failure of any major component of the treatment facilities which the permittee may have reason to believe would result in an effluent violation.

SECTION 9: REGIONAL MUNICIPAL SLUDGE INCINERATOR FACILITIES

- (A) On or before 90 days after the issuance date of this permit, the permittee shall submit to the Commissioner for review and approval either: (i) verification that the previously submitted and approved wastewater sludge screening, monitoring and reporting protocol for acceptance of wastewater sludges generated from outside sources that will be transported to the permittee's POTW for further processing and disposal by means of incineration has not changed or (ii) the new protocol. "Transported" means trucked or hauled wastewater sludge taken to dedicated receiving facilities at the POTW. "Sludge" means solid, semi-solid or liquid residue generated from municipal, residential, commercial or industrial biological wastewater treatment processes exclusive of the treated effluent, including water treatment wastewater sludges. Such protocol shall address and include, at a minimum, the following elements:
- (1) All Out of State Municipal POTW Sewage Sludge Generators and All Out of State Privately Owned Domestic Sewage Sludge Generators
 - (a) The permittee shall monitor or cause each generator to monitor the pollutants specified in Table H of this permit at a frequency no less than quarterly. These results shall be included in the annual report described in subparagraph (3)(d) below. In the event of an infrequent delivery to the POTW, the generator shall submit monitoring results for all the pollutants listed in Table H from a representative sludge sample generated and collected within the previous three months.
 - (b) Each out of state generator must be analyzed by the permittee for all the pollutants listed in Table H prior to acceptance at the POTW. The permittee shall determine that each such source is compatible with all other wastewater sludges accepted for incineration.
 - (c) Each out of state generator shall provide a description of the domestic, commercial and industrial components generating the biological sludge.
 - (2) All (In state or Out of State) Commercial and Industrial (Non-Domestic) Sludges
 - (a) Prior to acceptance of any non-domestic wastewater sludge for incineration, the permittee shall, as applicable, require the generator of such sludge to: (i) submit to the POTW a copy of its current active individual wastewater discharge permit issued by DEEP under Section 22a-430 of the Connecticut General Statutes (CGS); (ii) if eligible under DEEP's general permit program (Section 22a-430b CGS), submit to the POTW a copy of that permit and, if required, the associated registration; or (iii) submit to the POTW a copy of any pertinent emergency or temporary authorization issued by the Commissioner pursuant to Section 22a-6k CGS.
 - (3) Permittee Actions
 - (a) The permittee shall conduct at its facility bimonthly monitoring of all the pollutants listed in Table H on a representative sample of filter cake taken prior to incineration.
 - (b) The Permittee shall conduct annual monitoring of all the pollutants listed in Table H for each municipal POTW and private sewage sludge generator accepted for incineration.
 - (c) The permittee shall include in its Monthly Operating Report (MOR) a list of all municipal, private and commercial/industrial sludge sources and the quantity of sludge accepted from each source.
 - (d) Beginning April 15th of the second year after approval of this protocol and each year after, the permittee shall submit to the Commissioner an annual report for the previous calendar year which will include the following:
 - (i) A statement certifying that all new out of state generators have been screened for acceptance in accordance with the approved protocol.
 - (ii) A statement certifying that the permittee has monitored or caused the generator of all out of state municipal POTW sewage sludge and privately owned domestic sewage sludge to monitor its wastewater sludge in accordance with paragraph (1)(a).

- (iii) A statement certifying that all generators of commercial and industrial (non-domestic) wastewater sludge accepted for incineration have complied with the requirements of paragraph (2)(a).
- (iv) A copy of the permittee's most current annual 40 CFR 503 report.
- (v) The individuals responsible for submitting the report shall certify in writing the following: "I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete."

SECTION 10: COMPLIANCE SCHEDULES

- (A) On or before 30 days after the date of issuance of this permit, the permittee shall retain one or more qualified consultants acceptable to the Commissioner to prepare the documents and implement or oversee the actions required by this permit and shall, by that date, notify the Commissioner in writing of the identity of such consultants. The permittee has retained Kleinfelder Northeast, Inc. to prepare the documents and implement or oversee the actions required by this permit. The permittee shall retain one or more qualified consultants acceptable to the Commissioner until the actions required by this permit have been completed, and within ten days after retaining any consultant other than the one originally identified under this paragraph, the permittee shall notify the Commissioner in writing of the identity of such other consultant. The consultant(s) retained to perform the studies and oversee any remedial measures required pursuant to paragraphs B, C, D, and E below shall be a qualified professional engineer licensed to practice in Connecticut. The permittee shall submit to the Commissioner a description of a consultant's education, experience and training which is relevant to the work required by this permit within ten days after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
- (B) On or before 90 days after the date of issuance of this permit, the permittee shall submit for the Commissioner's review and written approval a comprehensive plan for the management of the on-site ash lagoons. The referenced plan shall include but not be limited to the following information:
 - (1) Description of best management practices including the dredging of the ash lagoons on a frequency necessary for maintaining them in a good operational condition.
 - (2) Description of the dewatering and disposal measures of the dredge spoils in accordance with applicable regulations and best management practices.
 - (3) Implementation and maintenance of proper erosion control measures.
 - (4) Verification that the existing sampling location(s) at the effluent of each ash lagoon is representative of the discharge.
 - (5) Establishment of a monitoring program in accordance with the requirements of table G monitoring location W included in attachment 1 of this permit.
- (C) The permittee shall conduct a system-wide mass balance analysis for Arsenic in accordance with the following information:
 - (1) On or before 400 days after the date of issuance of this permit, submit for the Commissioner's review and written approval, a report detailing a system-wide mass balance analysis which evaluates the relative loading of Arsenic from industrial, commercial and residential sources including consideration of the public water supply and distribution system.
 - (2) If determined necessary on the basis of at least 2 years of Arsenic discharge monitoring data required pursuant to Section 5 and table A included herein, the Commissioner will evaluate the need for inclusion of water quality based limitations in this permit in accordance with the Connecticut Water Quality Standards and criteria, pursuant to 40 CFR 122.4(d).
 - (3) If determined necessary on the basis of the evaluations performed in steps 10(C)(1) and 10(C)(2) above, on or before 300 days after the determination is made, the permittee may be required to submit for the Commissioner's review and written approval a comprehensive and thorough engineering report which describes and evaluates alternative actions to achieve compliance with the Arsenic limitations in Section 5 of this permit. Such report shall:

- (a) Evaluate alternative actions to achieve compliance including but not limited to imposing additional pretreatment requirements on industrial users, modification of potable water treatment practices and operational changes to improve removal efficiencies at the permittee's facility,
 - (b) State in detail the most expeditious schedule for performing each alternative,
 - (c) List all permits and approvals required for each alternative, including but not limited to any permits required under Sections 22a-32, 22a-42a, 22a-342, 22a-361, 22a-368 or 22a-430 of the CGS,
 - (d) Propose a preferred alternative or combination of alternatives with supporting justification therefore, and
 - (f) Propose a detailed program and schedule to perform all actions required to implement the preferred alternative, including but not limited to a schedule for submission of engineering plans and specifications for any new equipment, the start and completion of any construction activities and applying for and obtaining all permits and approvals required for such actions.
- (D) The permittee shall achieve the final water quality-based effluent limits for **phosphorus** for DSN 001-1 established in Section 5 of this permit, in accordance with the following:
- (1) On or before **400 days** after the date of issuance of this permit, the permittee shall submit for the Commissioner's review and written approval a comprehensive and thorough engineering report which describes and evaluates alternative actions which may be taken by permittee to achieve compliance with the Phosphorus limitations in Section 5 of this permit. The consultant(s) retained shall be a qualified professional engineer licensed to practice in Connecticut. The permittee shall submit to the Commissioner a description of a consultant's education, experience and training which is relevant to the work required under this section of the permit within ten days after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable. The above-referenced report shall:
 - (a) List all permits and approvals required for each alternative, including but not limited to any permits required under Sections 22a-32, 22a-42a, 22a-342, 22a-361, 22a-368 or 22a-430 of the CGS,
 - (b) Propose a preferred alternative or combination of alternatives with supporting justification therefore,
 - (c) State in detail the most expeditious schedule for performing each alternative, and
 - (d) Propose a detailed program and schedule to perform all actions required to implement the preferred alternative, including but not limited to a schedule for submission of engineering plans and specifications for any new equipment, the start and completion of any construction activities and applying for and obtaining all permits and approvals required for such actions.
 - (2) Unless another deadline is specified in writing by the Commissioner, on or before **180 days** after approval of the engineering report, the permittee shall (1) submit for the Commissioner's review and written approval, contract plans and specifications for the approved remedial actions, a revised list of all permits and approvals required for such actions and a revised schedule for applying for and obtaining such permits and approvals; and (2) submit applications for all permits and approvals required under Sections 22a-430 and 22a-416 of the CGS. The permittee shall obtain all required permits and approvals
- (E) The permittee shall achieve the final water quality-based effluent limits **Escherichia coli** for DSN 001-1 established in Section 5 of this permit, in accordance with the following:
- (1) On or before **400 days** after the date of issuance of this permit, the permittee shall submit for the Commissioner's review and written approval a comprehensive and thorough report which describes the actions to be taken by the permittee necessary to achieve compliance with the requirements in Table A of this permit for **Escherichia coli**. Such report shall include a schedule for implementation of such actions not to exceed **900 days** after the date of issuance of this permit.
 - (2) In the event that the permittee becomes aware that it will be able to comply with the bacterial limits described in this Section of the permit before any of the deadlines specified herein, the permittee shall immediately notify in writing the person identified in Section 10(L) below, and the referenced bacterial limits shall become effective on the 1st day of the month following the date of submission of said written notification.

- (3) In accordance with the schedule approved in writing by the Commissioner, but in no event later than **900 days** after the date of issuance of this permit, the permittee shall perform the actions approved in writing by the Commissioner necessary to comply with the requirements in Table A of this permit for *Escherichia coli*. Within fifteen days after completing such actions, the permittee shall certify to the Commissioner in writing that the actions have been completed as approved by the Commissioner
- (F) The permittee shall submit to the Commissioner **semiannual** status reports beginning sixty days after the date of approval of the report(s) referenced in this Section. Status reports shall include, but not be limited to a detailed description of progress made by the permittee in performing actions required by this Section of the permit in accordance with the approved schedule including, but not limited to, development of engineering plans and specifications, construction activity, contract bidding, operational changes, preparation and submittal of permit applications, and any other required actions required in this Section.
- (G) The permittee shall perform the approved actions in accordance with the approved schedule(s), but in no event shall the approved actions be completed later than: 900 days after the date of issuance of this permit for compliance with the *Escherichia coli* limits and 1,800 days after the date of issuance of this permit for compliance with the *Phosphorus* limits. Within fifteen days after completing such actions, the permittee shall certify to the Commissioner in writing that the actions have been completed as approved.
- (H) The permittee shall use best efforts to submit to the Commissioner all documents required by this Section of the permit in a complete and approvable form. If the Commissioner notified the permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty days of the Commissioner's notice of deficiencies. In approving any document or other action under this Compliance Schedule, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this Section of the permit. Nothing in this paragraph shall excuse noncompliance or delay.
- (I) Dates. The date of submission to the Commissioner of any document required by this section of the permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this section of the permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" as used in this Section of the permit means calendar day. Any document or action which is required by this Section only of the permit, to be submitted, or performed, by a date which falls on, Saturday, Sunday, or a Connecticut or federal holiday, shall be submitted or performed on or before the next day which is not a Saturday, Sunday, or Connecticut or federal holiday.
- (J) Notification of noncompliance. In the event that the permittee becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this Section of the permit or of any document required hereunder, the permittee shall immediately notify the Commissioner and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. In so notifying the Commissioner, the permittee shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and the permittee shall comply with any dates which may be approved in writing by the Commissioner. Notification by the permittee shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
- (K) Notice to Commissioner of changes. Within fifteen days of the date the permittee becomes aware of a change in any information submitted to the Commissioner under this Section of the permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the correct or omitted information to the Commissioner.
- (L) Submission of documents. Any document, other than a DMR, ATMR or MOR required to be submitted to the Commissioner under this Section of the permit shall, unless otherwise specified in writing by the Commissioner, be directed to:

Carlos Eguerra, Sanitary Engineer
Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse, Planning and Standards Division
79 Elm Street
Hartford, Connecticut 06106-5127

This permit is hereby issued on: 8/21/2014

/s/ _____
Betsey Wingfield
Bureau Chief
Bureau of Water Protection and Land Reuse

ATTACHMENT 1

Tables A through H

TABLE A

Discharge Serial Number (DSN): 001-1		Monitoring Location: 1											
Wastewater Description: Sanitary Sewage		Monitoring Location Description: Final Effluent (after dechlorination)											
Allocated Zone of Influence (ZOI): 19.75 cfs (allocated)		FLOW/TIME BASED MONITORING					INSTANTANEOUS MONITORING						
PARAMETER	Units	FLOW/TIME BASED MONITORING					INSTANTANEOUS MONITORING					REPORT FORM	Minimum Level Analysis See Section 6
		Average Monthly Limit	Maximum Daily Limit	Sample Freq.	Sample type	Instantaneous Limit or Required Range ³	Sample Freq.	Sample Type					
Alkalinity	mg/l	NA	NA	NR	NA	---	Monthly	Grab	MOR				
Arsenic, Total	mg/l	---	---	Weekly	Daily Composite	NA	NA	NA	DMR/MOR	*			
Carbonaceous Biochemical Oxygen Demand (5 day) ¹ (November 1 st through May 31 st), see remark E below	mg/l	25	40	3/Week	Daily Composite	NA	NR	NA	DMR/MOR				
Carbonaceous Biochemical Oxygen Demand (5 day) ¹ (June 1 st through October 31 st), see remark E below	mg/l	15	25	3/Week	Daily Composite	NA	NR	NA	DMR/MOR				
Chlorine, Total Residual (May 1 st through September 30 th), see remark A below	mg/l	---	0.06	4/ Work Day	Grab ⁴	0.12	4/ Work Day	Grab	DMR/MOR	*			
Copper, Total	mg/l	---	---	Monthly	Daily Composite	NA	NA	NA	DMR/MOR	*			
Fecal Coliform (May 1 st through September 30 th) ⁵ , until implementation of E. coli limits	Colonies per 100 ml	NA	NA	NR	NA	see remarks B and C below	3/Week	Grab	DMR/MOR				
Escherichia coli (May 1 st through September 30 th) ⁶ , See remark D below	Colonies per 100 ml	NA	NA	NR	NA	410	3/Week	Grab	DMR/MOR				
Flow, (Average daily)	MGD	---	---	Continuous ²	Daily flow	NA	NR	NA	DMR/MOR				
Nickel, Total	kg/d	2.14	3.94	Weekly	Daily Composite	NA	NA	NA	DMR/MOR	*			
Nitrogen, Ammonia (total as N) May June July 1 st - September 30 th October November 1 st - April 30 th	mg/l	16.0 10.0 4.0 8.0 25.0	NA	3/Week	Daily Composite	NA	NR	NA	DMR/MOR				
Nitrogen, Nitrate (total as N)	mg/l	---	NA	Monthly	Daily Composite	NA	NR	NA	MOR				

Nitrogen, Nitrite (total as N)	mg/l	-----	NA	Monthly	Daily Composite	NA	NR	NA	MOR
Nitrogen, Total Kjeldahl	mg/l	-----	NA	Monthly	Daily Composite	NA	NR	NA	MOR
Nitrogen, Total	mg/l	-----	NA	Monthly	Daily Composite	NA	NR	NA	MOR
Nitrogen, Total	lbs/day	NA	---	Monthly	Daily Composite	NA	NR	NA	MOR
Oxygen, Dissolved	mg/l	NA	NA	NR	NA	> 5.0	Work Day	Grab	DMR/MOR
pH	S.U.	NA	NA	NR	NA	6 - 9	Work Day	Grab	DMR/MOR
Phosphate, Ortho	mg/l	NA	---	2/Week	Daily Composite	NA	NR	NA	MOR
November 1 st through March 30 th	mg/l	NA	---	Monthly	Daily Composite	NA	NR	NA	MOR
Phosphorus, Total	mg/l	0.55	1.24	2/Week	Daily Composite	NA	NR	NA	DMR/MOR
April 1 st through October 31 st	mg/l	NA	---	Monthly	Daily Composite	NA	NR	NA	MOR
November 1 st through March 30 th	mg/l	NA	---	Monthly	Daily Composite	NA	NR	NA	DMR/MOR
Phosphorus, Total	lbs/day	---	NA	2/Week	Daily Composite	NA	NR	NA	MOR
April 1 st through October 31 st	lbs/day	---	NA	2/Week	Calculated	NA	NR	NA	DMR/MOR
Phosphorus, Total ⁸ (Average Seasonal Load Cap)	lbs/day	---	NA	2/Week	Calculated	NA	NR	NA	DMR/MOR
October	lbs/day	---	NA	2/Week	Calculated	NA	NR	NA	DMR/MOR
Selenium, Total	kg/d	0.35	0.75	Weekly	Daily Composite	NA	NR	NA	DMR/MOR
Solids, Settleable	ml/l	NA	NA	NA	NA	---	Work Day	Grab	MOR
Solids, Total Suspended ¹ , see remark E	mg/l	30	45	3/Week	Daily Composite	NA	NR	NA	DMR/MOR
Temperature	°F	NA	NA	NR	NA	---	Work Day	Grab	MOR
Turbidity	NTU	NA	NA	NA	NA	---	Work Day	Grab	MOR
Zinc, Total	kg/d	3.79	5.68	Weekly	Daily Composite	NA	NR	NA	DMR/MOR

TABLE A - CONDITIONS

Footnotes:

- ¹ The discharge shall not exceed an average monthly of 25 mg/l or a maximum daily of 40 mg/l from November 1 through May 31; and an average monthly of 15 mg/l or a maximum daily of 25 mg/l from June 1 through October 31 for effluent CBOD₅. The discharge shall not exceed an average monthly of 30 mg/l or a maximum daily of 45 mg/l for Suspended Solids.
- ² The permittee shall record and report on the monthly operating report the minimum, maximum and total flow for each day of discharge and the average daily flow for each sampling month. The permittee shall report, on the discharge monitoring report, the average daily flow and maximum daily flow for each sampling month.
- ³ The instantaneous limits in this column are maximum limits except for Dissolved Oxygen which is a minimum limit.
- ⁴ The Maximum Daily Concentration to be reported shall be determined by mathematically averaging the results of the four grab samples required above. The Average Monthly Concentration shall be determined by mathematically averaging the results of the Maximum Daily Concentrations required above.
- ⁵ During the period beginning at the date of issuance of this permit and lasting until the implementation of Escherichia coli monitoring at the Water Pollution Control Facility, the discharge shall not exceed and shall otherwise conform to specific terms and conditions listed.
- ⁶ During the period beginning after the implementation of Escherichia coli monitoring, but no later than 900 days after permit issuance, lasting until expiration, the discharge shall also not exceed and shall otherwise conform to the specific terms and conditions listed.

Footnotes (Continued)

⁷ During the period beginning after the implementation of phosphorus removal but no later than 1,800 days after permit issuance, the discharge shall also not exceed and shall otherwise conform to the specific terms and conditions listed.

⁸ During the period beginning after the implementation of phosphorus removal but no later than 1,800 days after permit issuance, the discharge shall not exceed the total phosphorus Average Seasonal Load listed. Compliance with the Average Seasonal Load Cap is determined as follows: The permittee's discharge shall not exceed the **total phosphorus Average Seasonal Load Cap of 16.43 lb/day** of total phosphorus per day for any two consecutive calendar years or any two of three consecutive calendar years.

Remarks:

(A) The use of chlorine (hypochlorite) for disinfection and sodium bisulfite for dechlorination shall be discontinued from October 1st through April 30th except that chlorination and dechlorination equipment may be started and tested no earlier than April 15th, and any residual chlorine gas or liquid and sodium bisulfite may be used up until, but no later than, October 15th. During these times in April and October the total residual chlorine of the effluent shall not be greater than 0.12 mg/l, as an instantaneous limit, and 0.06 mg/l, as a maximum daily limit. The analytical results shall be reported on the MOR for the months of April and October.

(B) The geometric mean of the fecal coliform bacteria values for the effluent samples collected in a period of a calendar month during the period from May 1st through September 30th shall not exceed 200 per 100 milliliters.

(C) The geometric mean of the fecal coliform bacteria values for the effluent samples collected in a period of a calendar week during the period from May 1st through September 30th shall not exceed 400 per 100 milliliters.

(D) The geometric mean of the Escherichia coli bacteria values for the effluent samples collected in a period of a calendar month during the period from May 1st through September 30th shall not exceed 126 per 100 milliliters.

(E) The Average Weekly discharge Limitation for CBOD₅ and Total Suspended Solids shall be 1.5 times the Average Monthly Limit listed above.

TABLE B

Discharge Serial Number (DSN): 001-1			Monitoring Location: K		
Wastewater Description: Sanitary Sewage					
Monitoring Location Description: Final Effluent					
Allocated Zone of Influence (ZOI): 19.75 cfs			In-stream Waste Concentration (IWC): 44.7 %		
PARAMETER	Units	FLOW/TIME BASED MONITORING			REPORT FORM
		Average Monthly Minimum	Sample Freq.	Sample type	
Carbonaceous Biochemical Oxygen Demand (5 day) Percent Removal ¹	% of Influent	85	3 per Week	Calculated ²	DMR/MOR
Solids, Total Suspended Percent Removal ¹	% of Influent	85	3 per Week	Calculated ²	DMR/MOR
TABLE B – CONDITIONS					
Footnotes: ¹ The discharge shall be less than or equal to 15% of the average monthly influent CBOD ₅ and total suspended solids (Table E, Monitoring Location G). ² Calculated based on the average monthly results described in Table A. Removal efficiency = $\frac{\text{Inf.BOD or TSS} - \text{Effluent BOD or TSS}}{\text{Inf.BOD or TSS}} \times 100$					

TABLE C

Discharge Serial Number (DSN): 001-1			Monitoring Location: T			
Wastewater Description: Sanitary Sewage						
Monitoring Location Description: Final Effluent (after dechlorination)						
Allocated Zone of Influence (ZOI): 19.75 cfs (allocated)			In-stream Waste Concentration (IWC): 44.7 %			
PARAMETER	Units	Maximum Daily Limit	Sampling Frequency	Sample Type	Reporting Form	Minimum Level Analysis See Section 6
Aluminum, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Antimony, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
NOAEL Static 48Hr Acute D. Pulex ¹	%	≥ 90	Quarterly	Daily Composite	ATMR/DMR	
NOAEL Static 48Hr Acute Pimephales ¹	%	≥ 90	Quarterly	Daily Composite	ATMR/DMR	
Arsenic, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Beryllium, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
BOD5	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
CBOD5	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Cadmium, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Chromium, Hexavalent	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Chromium, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Chlorine, Total Residual	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Copper, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Cyanide, Amenable	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Cyanide, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Iron, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Lead, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Mercury, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Nickel, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Nitrogen, Ammonia (total as N)	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Nitrogen, Nitrate, (total as N)	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Nitrogen, Nitrite, (total as N)	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Phenols, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Phosphorus, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Selenium, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Silver, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Suspended Solids, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	
Thallium, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
Zinc, Total	mg/l	-----	Quarterly	Daily Composite	ATMR/DMR	*
TABLE C - CONDITIONS						
Remarks:						
1. The results of the Toxicity Tests are recorded in % survival. The permittee shall report % survival on the DMR based on criteria in Section 6(B) of this permit.						

TABLE D

Discharge Serial Number: 001-1		Monitoring Location: N		
Wastewater Description: Activated Sludge				
Monitoring Location Description: Each Aeration Unit				
PARAMETER	REPORTING FORMAT	INSTANTANEOUS MONITORING		REPORTING FORM
		Sample Frequency	Sample Type	
Oxygen, Dissolved	High & Low for each Work Day	2/Work Day	Grab	MOR
Sludge Volume Index	Work Day	Work Day	Grab	MOR
Mixed Liquor Suspended Solids	Work Day	Work Day	Grab	MOR

TABLE E

Discharge Serial Number: 001-1			Monitoring Location: G				
Wastewater Description: Sanitary Sewage							
Monitoring Location Description: Influent							
PARAMETER	Units	DMR REPORTING FORMAT	FLOW/TIME BASED MONITORING		INSTANTANEOUS MONITORING		REPORTING FORM
			Sample Frequency	Sample Type	Sample Frequency	Sample Type	
Carbonaceous Biochemical Oxygen Demand (5 day)	mg/l	Monthly average	3/Week	Daily Composite	NA	NA	DMR/MOR
Arsenic, Total	mg/l		Weekly	Daily Composite	NA	NA	DMR/MOR
Nickel, Total	Kg/d		Weekly	Daily Composite	NA	NA	DMR/MOR
Nitrogen, Ammonia (total as N)	mg/l		3/week	Daily Composite	NA	NA	MOR
Nitrogen, Nitrate (total as N)	mg/l		Monthly	Daily Composite	NA	NA	MOR
Nitrogen, Nitrite (total as N)	mg/l		Monthly	Daily Composite	NA	NA	MOR
Nitrogen, Total Kjeldahl	mg/l		Monthly	Daily Composite	NA	NA	MOR
Nitrogen, Total	mg/l		Monthly	Daily Composite	NA	NA	MOR
Phosphate, Ortho	mg/l		Monthly	Daily Composite	NA	NA	MOR
Phosphorus, Total	mg/l		Monthly	Daily Composite	NA	NA	MOR
pH	S.U.		NA	NA	Work Day	Grab	MOR
Solids, Total Suspended	mg/l	Monthly average	3/Week	Daily Composite	NA	NA	DMR/MOR
Selenium, Total	Kg/d	Monthly average	Weekly	Daily Composite	NA	NA	DMR/MOR
Temperature	°F		NA	NA	Work Day	Grab	MOR
Zinc, Total	Kg/d		Weekly	Daily Composite	Work Day	NA	DMR/MOR

TABLE F

Discharge Serial Number: 001-1			Monitoring Location: P				
Wastewater Description: Primary Effluent							
Monitoring Location Description: Primary Sedimentation Basin Effluent							
PARAMETER	Units	REPORTING FORMAT	TIME/FLOW BASED MONITORING		INSTANTANEOUS MONITORING		REPORTING FORM
			Sample Frequency	Sample Type	Sample Frequency	Sample Type	
Alkalinity, Total	mg/l		NA	NA	Monthly	Grab	MOR
Carbonaceous Biochemical Oxygen Demand (5 day)	mg/l	Monthly average	Weekly	Composite	NA	NA	MOR
Nitrogen, Ammonia (total as N)	mg/l		Monthly	Composite	NA	NA	MOR
Nitrogen, Nitrate (total as N)	mg/l		Monthly	Composite	NA	NA	MOR
Nitrogen, Nitrite (total as N)	mg/l		Monthly	Composite	NA	NA	MOR
Nitrogen, Total Kjeldahl	mg/l		Monthly	Composite	NA	NA	MOR
Nitrogen, Total	mg/l		Monthly	Composite	NA	NA	MOR
pH	S.U.		NA	NA	Monthly	Grab	MOR
Solids, Total Suspended	mg/l	Monthly average	Weekly	Composite	NA	NA	MOR

TABLE G

Discharge Serial Number: 001-1		Monitoring Location: W	
Wastewater Description: Ash Lagoon Effluent			
Monitoring Location Description: Ash Lagoon Effluent			
PARAMETER	INSTANTANEOUS MONITORING		REPORTING FORM
	Units	Grab Sample Freq.	
Aluminum, Total	mg/l	Bi-monthly	DMR/MOR
Arsenic, Total	mg/l	Bi-Monthly	DMR/MOR
Beryllium, Total	mg/l	Bi-Monthly	DMR/MOR
Cadmium, Total	mg/l	Bi-Monthly	DMR/MOR
Chromium, Total	mg/l	Bi-Monthly	DMR/MOR
Copper, Total	mg/l	Bi-Monthly	DMR/MOR
Iron, Total	mg/l	Bi-Monthly	DMR/MOR
Lead, Total	mg/l	Bi-Monthly	DMR/MOR
Mercury, Total	mg/l	Bi-Monthly	DMR/MOR
Nickel, Total	mg/l	Bi-Monthly	DMR/MOR
pH	S.U.	Bi-Monthly	DMR/MOR
Selenium, Total	mg/l	Bi-Monthly	DMR/MOR
Temperature	°F	Bi-Monthly	DMR/MOR
Zinc, Total	mg/l	Bi-Monthly	DMR/MOR

TABLE H

Discharge Serial Number: 001-1		Monitoring Location: S	
Wastewater Description: Dewatered or Thickened Sludge			
Monitoring Location Description: Dewatered Sludge After Filter Press			
PARAMETER	INSTANTANEOUS MONITORING		REPORTING FORM
	Units	Grab Sample Freq.	
Arsenic, Total	mg/kg	Bi-Monthly	DMR
Beryllium, Total	mg/kg	Bi-Monthly	DMR
Cadmium, Total	mg/kg	Bi-Monthly	DMR
Chromium, Total	mg/kg	Bi-Monthly	DMR
Copper, Total	mg/kg	Bi-Monthly	DMR
Lead, Total	mg/kg	Bi-Monthly	DMR
Mercury, Total	mg/kg	Bi-Monthly	DMR
Nickel, Total	mg/kg	Bi-Monthly	DMR
Nitrogen, Ammonia *	mg/kg	Bi-Monthly	DMR*
Nitrogen, Nitrate (total as N) *	mg/kg	Bi-Monthly	DMR*
Nitrogen, Organic *	mg/kg	Bi-Monthly	DMR*
Nitrogen, Nitrite (total as N) *	mg/kg	Bi-Monthly	DMR*
Nitrogen, Total *	mg/kg	Bi-Monthly	DMR*
pH	S.U.	Bi-Monthly	DMR
Polychlorinated Biphenyls	mg/kg	Bi-Monthly	DMR
Selenium, Total	mg/kg	Bi-Monthly	DMR
Solids, Fixed	%	Bi-Monthly	DMR
Solids, Total	%	Bi-Monthly	DMR
Solids, Volatile	%	Bi-Monthly	DMR
Zinc, Total	mg/kg	Bi-Monthly	DMR
<p>(*) required for composting or land application only</p> <p>Testing for inorganic pollutants shall follow "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", EPA Publication SW-846 as updated and/or revised.</p>			

ATTACHMENT 2
MONTHLY OPERATING REPORT FORM

This and the following page have been left blank to reserve page numbers for the MOR form to be edited by DEEP.

ATTACHMENT B
Ash Lagoon Management Plan

Ash Lagoon Management Plan - Naugatuck WWTP

Introduction

The lagoons are located on the Southern end of the plant. Each lagoon has a volume of roughly 106,000 cubic feet or 792,000 US gallons. This volume is confirmed based on ash hauling information from the last contract year.

Operation

Ash from the incinerator exhaust is disposed of in one of two ash lagoons. (Figure 2 and 3). Each lagoon is lined with a clay liner. The liner is inspected when each lagoon is dredged. The staff checks the lagoon each shift to ensure that they are not leaking. Typically one lagoon is in service while the other is drained and dredged.

The ash lagoon is accessible by a paved access road located on the southeast side of the wastewater facility (Figure 1). Ash slurry is continuously pumped to the lagoon and overflow is directed back to headworks via gravity flow.

Each lagoon is placed in or removed from service depending upon suspended solids analysis of the effluent. The effluent is sampled every Wednesday. Ash that is dredged is piled within the non-operating lagoon and allowed to drain. Ash may be stock piled in the non-operating lagoon or piled in a concrete block enclosed structure (Figure 4 and 5). Should the ash become dry, staff will spray water on the surface to eliminate any fugitive dust issues.

The ash lagoon perimeter is graded and sloped (Figure 6) to allow any runoff to flow directly into the lagoons. The ash lagoon perimeter is seeded and mowed, with the exception of the loading area. A silt fence along the entire perimeter provides additional protection to contain runoff. The silt fence is maintained as needed.

Permit Requirements

The ash lagoon effluent is sampled per the current CTDEEP NPDES permit. The test parameters are per table G of the permit (Figure 7). The monitoring location, W, is identified at the sample location (Figure 8).



Access
Road

Figure 1: Aerial View



Figure 2: North Lagoon



Figure 3: North and South Lagoon



Figure 4: Concrete Berm



Figure 5: Concrete Berm Sign



Figure 6: Lagoon perimeter

TABLE G

Discharge Serial Number: 091-1		Monitoring Location: W	
Wastewater Description: Ash Lagoon Effluent			
Monitoring Location Description: Ash Lagoon Effluent			
PARAMETER	INSTANTANEOUS MONITORING		REPORTING FORM
	Units	Grab Sample Freq.	
Alumina, Total	mg/l	Bi-Monthly	DMR MOR
Arsenic, Total	mg/l	Bi-Monthly	DMR MOR
Boron, Total	mg/l	Bi-Monthly	DMR MOR
Calcium, Total	mg/l	Bi-Monthly	DMR MOR
Chlorine, Total	mg/l	Bi-Monthly	DMR MOR
Copper, Total	mg/l	Bi-Monthly	DMR MOR
Iron, Total	mg/l	Bi-Monthly	DMR MOR
Lead, Total	mg/l	Bi-Monthly	DMR MOR
Mercury, Total	mg/l	Bi-Monthly	DMR MOR
Nickel, Total	mg/l	Bi-Monthly	DMR MOR
pH	S.U.	Bi-Monthly	DMR MOR
Selenium, Total	mg/l	Bi-Monthly	DMR MOR
Temperature	°F	Bi-Monthly	DMR MOR
Zinc, Total	mg/l	Bi-Monthly	DMR MOR

PERMIT No. CT 0106641

PAGE 22

Figure 7: Table G, Test Parameters



Figure 8: Monitoring Location W

ATTACHMENT C
Laboratory Results



Monday, November 10, 2014

Attn: Mr. Tom Deller
Veolia Water, Naugatuck Plant
500 Cherry Street
Naugatuck, CT 06770

Project ID: NAUGATUCK
Sample ID#s: BH36634

This laboratory is in compliance with the NELAC requirements of procedures used except where indicated.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

A handwritten signature in cursive script that reads "Phyllis Shiller".

Phyllis Shiller
Laboratory Director

NELAC - #NY11301
CT Lab Registration #PH-0618
MA Lab Registration #MA-CT-007
ME Lab Registration #CT-007
NH Lab Registration #213693-A,B

NJ Lab Registration #CT-003
NY Lab Registration #11301
PA Lab Registration #68-03530
RI Lab Registration #63
VT Lab Registration #VT11301



Environmental Laboratories, Inc.
 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
 Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report
 November 10, 2014

FOR: Attn: Mr. Tom Deller
 Veolia Water, Naugatuck Plant
 500 Cherry Street
 Naugatuck, CT 06770

Sample Information

Matrix: WASTE WATER
 Location Code: VEOLIANA
 Rush Request: Standard
 P.O.#: 7766000379

Custody Information

Collected by: TD
 Received by: LB
 Analyzed by: see "By" below

Date Time

11/04/14 0:00
 11/05/14 15:20

Laboratory Data

SDG ID: GBH36634
 Phoenix ID: BH36634

Project ID: NAUGATUCK
 Client ID: ASH LAGOON EFFLUENT

Parameter	Result	RL/ PQL	Units	Date/Time	By	Reference
Aluminum	12.6	0.010	mg/L	11/06/14	LK	E200.7
Arsenic	0.073	0.004	mg/L	11/06/14	LK	E200.7
Beryllium	< 0.001	0.001	mg/L	11/06/14	LK	E200.7
Cadmium	0.0096	0.0002	mg/L	11/06/14	RS	SM3113B
Chromium	0.031	0.001	mg/L	11/06/14	LK	E200.7
Copper	1.92	0.005	mg/L	11/06/14	LK	E200.7 2
Iron	14.9	0.010	mg/L	11/06/14	LK	E200.7
Mercury	0.0007	0.0002	mg/L	11/06/14	RS	245.1
Nickel	0.074	0.001	mg/L	11/06/14	LK	E200.7
Lead	0.140	0.002	mg/L	11/06/14	LK	E200.7
Selenium	0.004	0.002	mg/L	11/07/14	RS	SM 3113B
Zinc	2.03	0.020	mg/L	11/08/14	LK	E200.7 2
Mercury Digestion	Completed			11/06/14	I/I	245.1
Total Metals Digestion	Completed			11/05/14	AG	

2 = This parameter may be outside client specified limits.

RL/PQL=Reporting/Practical Quantitation Level ND=Not Detected BRL=Below Reporting Level

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.
 This report must not be reproduced except in full as defined by the attached chain of custody.

Phyllis Shiller, Laboratory Director
 November 10, 2014

Reviewed and Released by: Deb Lawrie, Project Manager



Environmental Laboratories, Inc.
 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
 Tel. (860) 645-1102 Fax (860) 645-0823

QA/QC Report

November 10, 2014

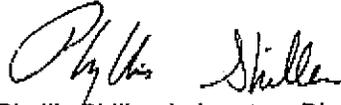
QA/QC Data

SDG I.D.: GBH36634

Parameter	Blank	Sample Result	Dup Result	Dup RPD	LCS %	LCSD %	LCS RPD	MS %	MSD %	MS RPD	% Rec Limits	% RPD Limits
QA/QC Batch 291403, QC Sample No: BH36124 (BH36634)												
Mercury - Water	BRL	<0.0002	<0.0002	NC	104	98.9	5.0	101	101	0.0	70 - 130	20
Comment: Additional Mercury criteria: LCS acceptance range for waters is 80-120% and for soils is 70-130%.												
QA/QC Batch 291244, QC Sample No: BH36124 (BH36634)												
Cadmium	BRL	<0.0002	<0.0002	NC	113	113	0.0	123	120	2.5	75 - 125	20
Selenium	BRL	<0.010	<0.010	NC	107	108	0.9	91.4	91.4	0.0	75 - 125	20
QA/QC Batch 291384, QC Sample No: BH36610 (BH36634)												
<u>ICP Metals - Aqueous</u>												
Aluminum	BRL	0.015	0.052	NC	101	102	1.0	96.4	100	3.7	75 - 125	20
Arsenic	BRL	<0.004	<0.004	NC	105	106	0.9	104	106	1.9	75 - 125	20
Beryllium	BRL	<0.001	<0.001	NC	100	102	2.0	100	103	3.0	75 - 125	20
Chromium	BRL	<0.001	<0.001	NC	102	103	1.0	100	103	3.0	75 - 125	20
Copper	BRL	0.005	<0.005	NC	101	102	1.0	100	104	3.9	75 - 125	20
Iron	BRL	0.040	0.038	NC	104	105	1.0	103	106	2.9	75 - 125	20
Lead	BRL	<0.002	<0.002	NC	103	104	1.0	101	103	2.0	75 - 125	20
Nickel	BRL	0.002	0.002	NC	106	107	0.9	104	107	2.8	75 - 125	20
Zinc	BRL	0.055	0.052	5.60	103	105	1.9	102	105	2.9	75 - 125	20

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

- RPD - Relative Percent Difference
- LCS - Laboratory Control Sample
- LCSD - Laboratory Control Sample Duplicate
- MS - Matrix Spike
- MS Dup - Matrix Spike Duplicate
- NC - No Criteria
- Intf - Interference


 Phyllis Shiller, Laboratory Director
 November 10, 2014

Sample Criteria Exceedences Report

Criteria: None

State: CT

GBH36634 - VEOLIANA

SampNo	Acode	Phoenix Analyte	Criteria	Result	RL	Criteria	RL	Criteria	Analysis Units
--------	-------	-----------------	----------	--------	----	----------	----	----------	----------------

*** No Data to Display ***

Phoenix Laboratories does not assume responsibility for the data contained in this report. It is provided as an additional tool to identify requested criteria exceedences. All efforts are made to ensure the accuracy of the data (obtained from appropriate agencies). A lack of exceedence information does not necessarily suggest conformance to the criteria. It is ultimately the site professional's responsibility to determine appropriate compliance.



Sent Certified R.R.R. mail #7009 2820 0004 1018 0941 on February 24, 2015

February 24, 2015

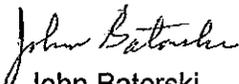
State of Connecticut
Department of Construction Services
Bureau of Elevators
165 Capital Avenue, Room 266
Hartford, Ct 06106-5808

RE: Notice of Violation dated Jan 26, 2015

Dear Ms. DiMitruck,

This letter is in response to the Notice of Violation issued on January 26, 2015. Otis elevator was notified and was onsite to February 17, 2015 inspect the elevator. As a result of their visit we have issued PO 7766002307 to Otis elevator for the required repairs to the hydraulic cylinder head. Currently the parts are on order thus the repairs will not be completed by Feb 22, 2015. We will notify you as soon as the parts arrive and are installed, so that a follow up inspection may be scheduled.

Sincerely,


John Batorski
Plant Manager

Enclosure: Notice of Violation



STATE OF CONNECTICUT
 Department of Construction Services, Bureau of Elevators
 165 Capitol Ave, Room 266
 Hartford, CT 06106-1620
 Phone: (860) 713-5808

Notice of Violation

Date: 01/26/2015
Location: Waste Water Plant
 500 Cherry St
 Naugatuck, CT 06770-4503

Us Filter Operating Services
 500 Cherry St
 Naugatuck, CT 06770-4503

To Whom It May Concern:

An inspection of your premises revealed that the following items require immediate correction. We request your cooperation in undertaking these corrective measures in a mutual effort to maintain safe and satisfactory conditions.

The violations found are listed below. You are hereby ordered to take the proper corrective action to remove or remedy all listed violations on or before the compliance dates.

Please contact our office in writing after violations have been remedied. We may schedule a re-inspection at that time. This will eliminate possible certification revocation.

At the time of this inspection conditions were made known to Matt.

Nancy C. DiMitruck

Nancy C. DiMitruck
 State Elevator Inspections Supervisor

Reg#/Car#	Classification	Violation Date	Comply By Date	Inspector
088-0046/1	Freight	01/23/2015	02/22/2015	Alexander Palmieri

Corrections:

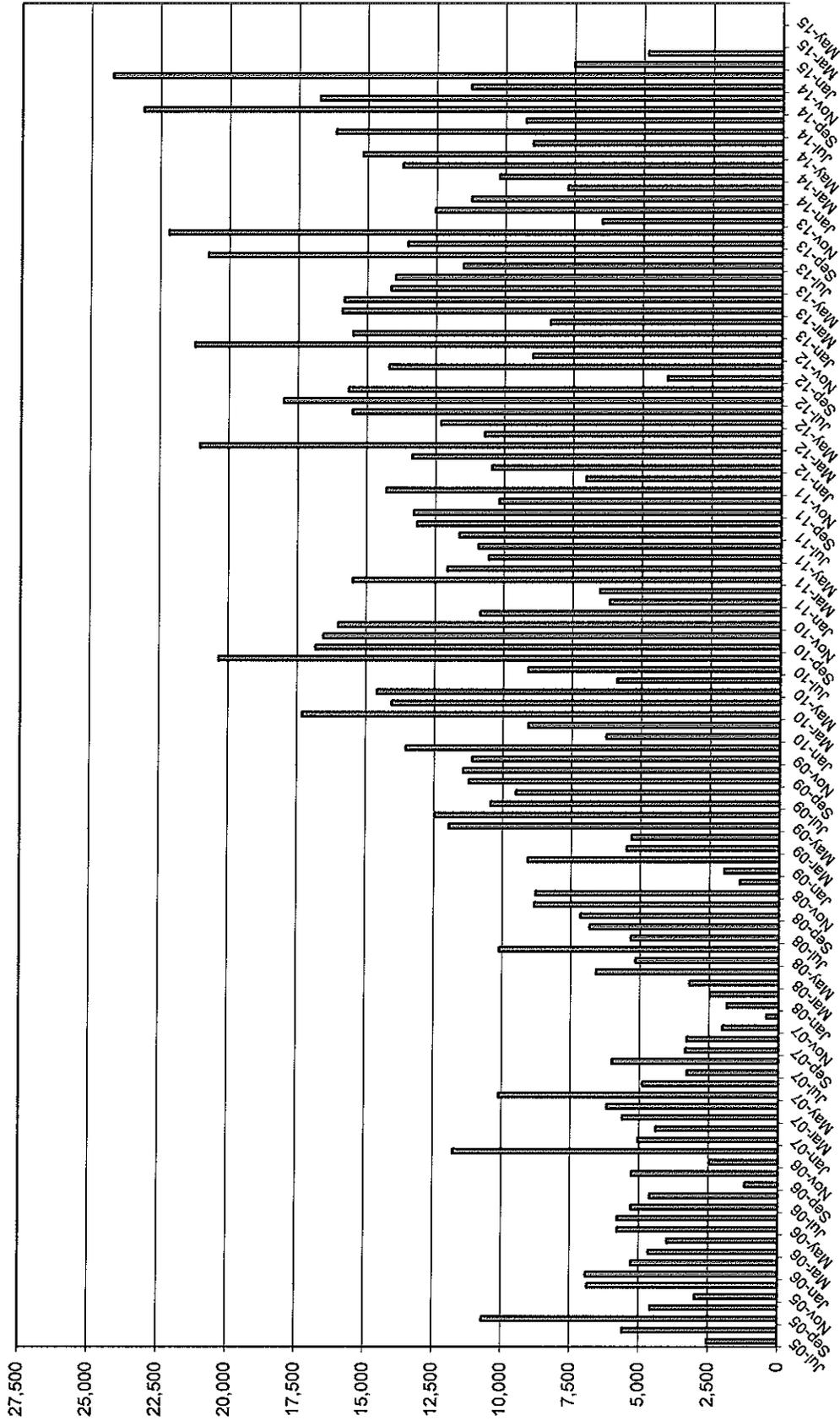
1.12: Post Current Elevator Operating Certificate under glass in elevator cab.

Corrections:

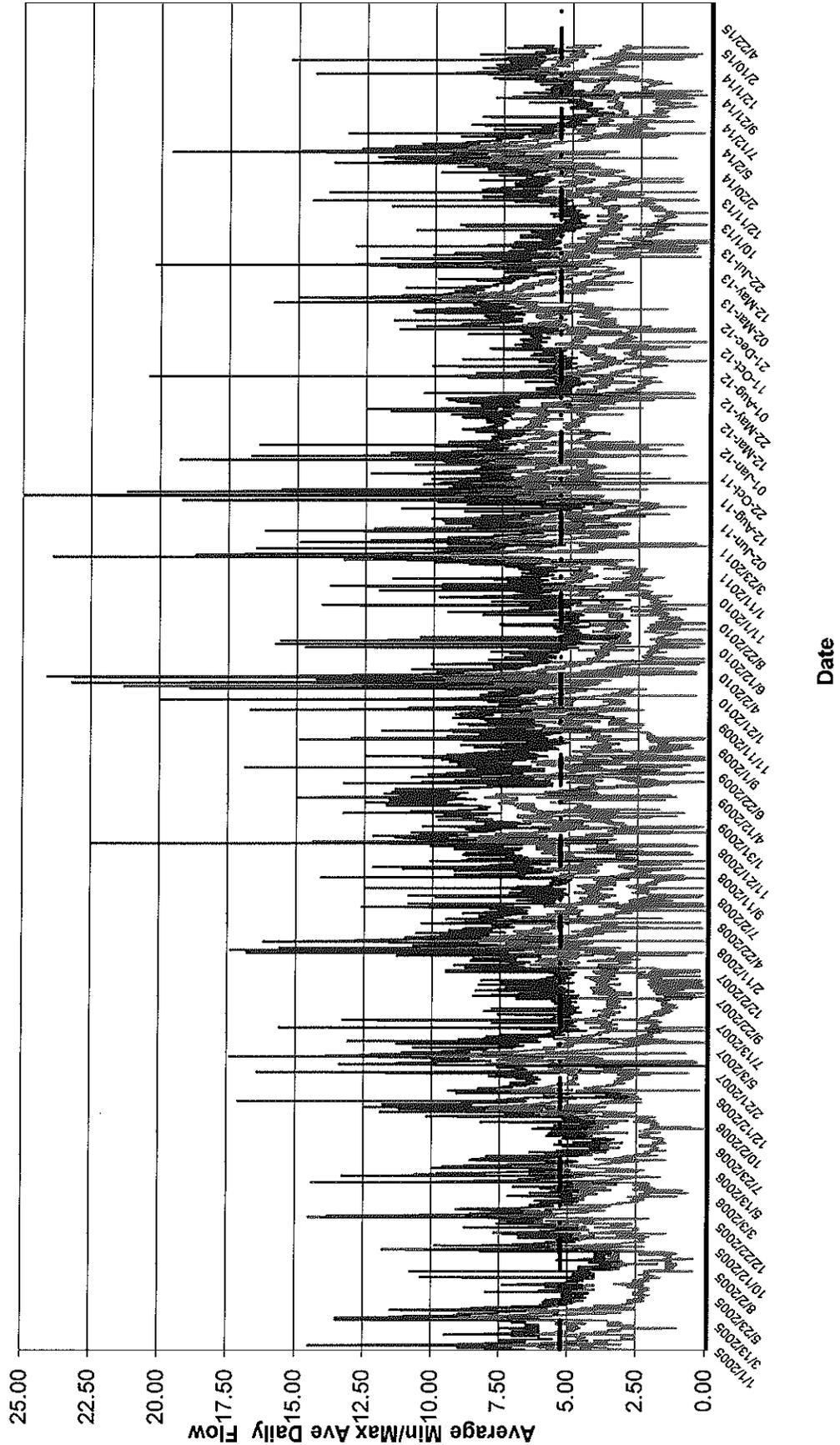
Correct cause of excessive oil loss at hydraulic cylinder head.

**Borough of Naugatuck
Total Feet of Sewers Cleaned
July 2005 to Present**

Total Feet



Naugatuck WPCF Daily Min/Max/Total Flow Data 2005 to Present MGD



Date

Effluent Flow Average
 Effluent Flow Max
 Linear (Effluent Flow Average)

Naugatuck, Middlebury and Oxford 2005 to Present Monthly Average Flows

