

**BOROUGH OF  
NAUGATUCK**

**MONTHLY REPORT  
MARCH 2016**



April 10, 2016

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

**Re: March 2016 Monthly Operating Report**

Dear Mr. Merancy:

Enclosed please find Veolia Water's Monthly Operating Report for the month of March 2016.

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 black ink 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 March 2016**

This report summarizes the activities at the Borough POTW for March 2016:

**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.	-	325
Effluent Avg.	30	5
Removal Efficiency	85%	98%
Plant Process Data*	Limit	Actual
Carbonaceous BOD (mg/l)		
Influent Avg.	-	173
Eff Avg(Nov 1 – May 31)	25	
Eff Avg(June – Oct 31)	15	4
Removal Efficiency	85%	98%

Discharge Permit Exceedance: None

	Naugatuck	Middlebury	Oxford	OTR
<b>Feb Flow Avg. (MGD)</b>	5.3	0.626	0.049	N/A
Sludge Liquid Total (MGal)				3035.2
Sludge Cake Total (Wet Tons)				416.8
Septage Total (MGal)	30,750	29,000	119,250	431,300
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. The incinerator has not started as result of the March 21, 2016 MACT (Maximum Achievable Control Technology) compliance date.
- b. On March 1 and 2, TRC Engineers were onsite for the Borough to collect details on the existing process operating parameter monitoring systems.
- c. On March 29 Borough elected officials and other vendors toured the facility. The tour was part of the Request for Expressions of Interest from the Borough involving the future of the WWTP after the Veolia contract expires.

**2. Odor Complaints**

- a. There were no odor complaints in March.
- b. Plant staff assisted Oxford staff with determining the source of the odors from the Oxford force main. Dye testing confirmed the source of the odors is from the Oxford force main. On April 1, 2016 Oxford placed a hydrogen sulfide data recorder in the same manhole Veolia did a few months ago.

**3. Personnel**

- a. No report.

#### **4. Health & Safety**

- a. Monthly safety was Fork truck training. This was both classroom and actual driver training.
- b. Annual respiratory fit testing/training was scheduled for April 4.

#### **5. Operational Information**

- a. Sludge was being diverted to MDC in Hartford, Mattabasset in Cromwell, Veolia Cranston, Rhode Island and the Ontario County Landfill in NY. In the later part of the month, MDC informed us that they could no longer accept the cake sludge.
- b. Several diffuser rings were replaced during a quick 2 day shutdown of aeration tanks #2 and #3.
- c. Planning is underway for the annual cleaning of the chlorine contact tanks and installation of disinfection/dechlorination equipment.
- d. We are reviewing potential changes regarding employee scheduling, dewatering, and sludge diversions to accommodate the incinerator outage.

#### **6. Collections**

- a. No report.

#### **7. Maintenance**

- a. The tuyere manifold was replaced.
- b. The south belt press received a new rotary screen thickener drive.
- c. Two replacement liquid dewatering belt press feed pumps are installed. These pumps replace 40 year old pumps no longer economical to maintain.
- d. The original secondary waste sludge pump for the #4 secondary tank is being replaced. The old Reeves drive is no longer serviceable.
- e. We have requested a quotation from Spirac for a conveyor that would attach to the silo discharge conveyor. The proposed conveyor would allow cake trucks to be loaded in less than one hour. We are limited to 4 cake trailers per day with the sludge cake feed pumps. The proposed conveyor would allow loading of multiple trucks in an 8 hour day, be more cost effective, and eliminate weekend cake loading operations during the period the incinerator is not in operation.

#### **5. Capital Projects**

- a. No report.

#### **9. Correspondence:** Letters related to incinerator MACT March 21, 2016 emission regulation.

- a. Letter dated March 7, 2016 from Mayor Hess.
- b. Letter dated March 10, 2016 from Daniel Gorka.
- c. Letter dated March 10, 2016 from EPA
- d. Letter dated March 24, 2016 from Daniel Gorka.
- e. Letter dated March 30, 2016 from Mayor Hess.
- f. Letter dated April 4, 2016 from Kleinfelder.

Borough of Naugatuck  
Collections Systems Report  
March 2016



Calls for Service	
1	03/03 - Lincoln St - Broken m/h lid
2	03/09 - Rayron Cir - Odors in house - Dry trap
3	03/12 - Hopbrook pumpstation - High level
4	03/15 - Rt 63 - 10-136 to 10-135
5	03/16 - Woodcrest Dr - Broken m/h ring
6	03/21 - 69 Woodland St - Lateral problem
7	

This Month  
7

Year to Date  
37

Calls Caused By Collection System	
1	Hopbrook pumpstation
2	Rt 63
3	
4	

Reason	
	Broken float
	Step in pipe caused rags to build and cause blockage

High Velocity Cleaning			
	Street Name	Date	Footage
1	Church St 9-2 to 9-211D	3/1/2016	350
2	N Main St 7-70A to 7-286	3/1/2016	725
3	N Main St 7-286 to 7-289	3/1/2016	580
4	N Main St 7-82 to 7-81	3/1/2016	200
5	High St 10-150 to no #	3/1/2016	620
6	High St 10-137A to 10-139	3/1/2016	275
7	Mulberry St 11-2 to 11-3	3/1/2016	300
8	Millville Ave 6-115 to 6-167	3/1/2016	225
9	Coventry Ln 5-45 to 5-34	3/2/2016	895
10	Rubber Ave Ext 5-36 to 5-33	3/2/2016	485
11	Tracey Ann Ct 10-70 to 10-63	3/8/2016	530
12	Rayron Cir / Tracey easement 10-66 to 10-64	3/8/2016	440
13	Morning Dove Rd no # to 11-131	3/9/2016	450
14	Morning Dove Rd 11-131 to 11-132	3/9/2016	440
15	Morning Dove Rd 14-74 to 14-73	3/10/2016	270
16	Morning Dove Rd 14-73 to 14-72	3/10/2016	255
17	Thistle Down Ln 14-75 to 14-72	3/10/2016	175
18	Thistle Down Ln 14-64 to 14-72	3/10/2016	240
19	Rt 63 10-135 to 10-136	3/16/2016	408
20	Woodcrest Dr 10-132 to 10-130	3/21/2016	458
21	Woodland St 10-133 to 10-130	3/21/2016	245
22	Hickory Rd 10-129 to 10-127	3/21/2016	550
23	Buritt Pl 10-130 to 10-127	3/21/2016	380
24	Ruela Dr 10-110 to 7-298A	3/22/2016	305
25	Ruela Dr 7-298A to 7-295	3/22/2016	480
26	Sunrise Cir 7-302 to 7-295	3/22/2016	530
27	Ruela Dr 7-295 to 7-290	3/24/2016	995
28	Lincoln St no # to 7-290	3/28/2016	190
29	Lincoln St 10-100 to 10-97	3/28/2016	645
30	Lincoln St 10-97 to 10-96	3/29/2016	170
31	Lincoln St 7-290 to 10-96	3/29/2016	175
32	Lincoln St easement 10-96 to 10-89	3/29/2016	420
33	Forest St 10-93 towards end of line	3/30/2016	25
34	Forest St 10-93 to 10-88	3/30/2016	1030
35	Forest St stub out	3/30/2016	25
36	June St no m/h #s	3/31/2016	415
37	June St easement 10-87 to 10-86	3/31/2016	200
38	June St 10-86 to 10-85	3/31/2016	65
39	Forest St 10-114 to 10-112	3/31/2016	355
40	Vine St 10-112 to 10-84	3/31/2016	445

6 month list  
Call for service

This Month  
15850 Feet

Year to Date  
138332 Feet

Root Treatment		
	Street Name	Footage
1		
2		
3		
		This Month
		0
		Feet
		Year to Date
		6742
		Feet

Video Inspections		
	Street Name	Footage
1	Rt 63 10-135 to 10-135A	30
2	Rt 63 10-137 to 10-136	200
3	530 Rt 68 lateral	55
4	Forest St easement 10-88 to 10-87	200
5		
6		
7		
		This Month
		485
		Feet
		Year to Date
		8955
		Feet

Pump Station Services			
	Work performed	Location	Date
1	Weekly pumpstation checks	All 5	3/4/2016
2	Weekly pumpstation checks	All 5	3/11/2016
3	Weekly pumpstation checks	All 5	3/18/2016
4	Weekly pumpstation checks	All 5	3/25/2016
5			
6			
7			

Cleaned floats, exercised gen, high wetwell test  
 Cleaned floats  
 Cleaned floats  
 Cleaned floats, exercised gen

PUMP RUN TIMES		HOURS		
STATION		Pump 1	Pump 2	Pump 3
Inwood	End Reading	792.9	1013.7	443.1
	Start Reading	756.6	971.7	402
	Hrs Run	36.3	42	41.1

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
MAPLE & MAY	End Reading	3882	3089
	Start Reading	3841.6	3056.2
	Hrs Run	40.4	32.8

PUMP RUN TIMES		HOURS		
STATION		Pump 1	Pump 2	Flow Meter
Platts Mill	End Reading	4857.8	7765.7	4161793
	Start Reading	4853.7	7638.7	3969565
	Hrs Run	4.1	127	192246 Fuel

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
Hopbrook	End Reading	1459.2	994.1
	Start Reading	1434.6	983.7
	Hrs Run	24.6	10.4

PUMP RUN TIMES		HOURS	
STATION		Pump 1	Pump 2
HORTON HILL	End Reading	8876.9	10540.4
	Start Reading	8799.2	10472.2
	Hrs Run	77.7	68.2

**Vac Truck Information**

Days out of the plant working		
This Month	YTD	Remaining
15	130	20

Fuel Information		Fuel Cost	Fuel Used		
		\$166.84	67.3	Gallons	YTD Gallons
		\$138.29	58.1	Gallons	1467.5
				Gallons	
				Gallons	YTD Fuel Cost
This Months Total		\$305.13	125.4	Gallons	\$3,983.43

Mileage	
Month Start	196506
Month End	197234.1
Total	728.1

Engine Hours	
Month Start	6246.8
Month End	6297.9
Total	51.1

Utility Truck Information		Fuel Cost	Fuel Used		
		\$73.70	29.73	Gallons	YTD Gallons
		\$85.79	34.6	Gallons	494.89
				Gallons	
				Gallons	YTD Fuel Cost
				Gallons	\$1,126.21
<b>Monthly Totals:</b>		<b>\$159.49</b>	<b>64.33</b>		

**Other tasks and notes**

1	3/1/2016 - Spread tar around roof skylights of the Plant.
2	3/2/2016 - Emptied sander and washed out the hopper.
3	3/3/2016 - Maple/May pumpstation was checked on for a loss of power alarm.
4	3/3/2016 - Broken lid on Lincoln St, pieces were retrieved out of invert and the lid was replaced.
5	3/7/2016 - Vacuumed out and cleaned Platts Mill wetwell. Tested both pumps. Watered down the Lagoons for dust control.
6	3/8/2016 - Pulled both pumps at Platts Mill to de-rag and clean them. Tested both pumps.
7	3/9/2016 - Prepared aeration tank area for Godwin pump arrival. Set up Godwin hoses. Fixed noisy lid on Tracy Ann Ct.
8	3/10/2016 - Continued to tar the roof area above the control room.
9	3/11/2016 - Helped out in the aeration tanks. Changed out diffusers and fixed PVC piping.
10	3/12/2016 - High level alarm at Hopbrook pump station. Bad float was found and repaired.
11	3/14/2016 - Vacuumed out and cleaned Hopbrook wetwell. Pulled #2 pump to de-rag and clean. Test station. Primary skimmings 1 load.
12	3/15/2016 - Helped to hose out and set up pump in the secondary tank. Vacuumed out and cleaned the liquid drop curtain drain.
13	3/15/2016 - RT 63 back up. Called G&L for signage and to expose a paveover.
14	3/16/2016 - Vacuumed out and cleaned Maple/May wetwell. Vacuumed out and cleaned Inwood wetwell.
15	3/16/2016 - Broken m/h 10-82 ring on 31 Woodcrest Dr. Ring was retrieved out of invert and scheduled to be fixed.
16	3/16/2016 - Lid on 23 Spruce Dr easement was looked at due to home owners request. A none vented lid will be looked into.
17	3/17/2016 - Tried to swap lid on 23 Spruce Dr. Grinded down ring, still the new lid would not fit. To be continued.
18	3/18/2016 - Continued to tar roof of the plant. Prepared trucks for possible snow.
19	3/21/2016 - Unclogged drop down at 10-127 on Hickory Rd.
20	3/23/2016 - Continued with plants roof repair. Replaced lid on Spruce Dr easement with none vented lid and caulked for a seal.
21	3/23/2016 - Inspected lid on Andrew Ave for possible repair. Vacuumed out and cleaned drain in front of foreign sludge drop.
22	3/24/2016 - Cut up pallets and cleaned up around the incinerator grounds.
23	3/28/2016 - Reset/adjusted #2 pump at Hopbrook pumpstation.
24	3/29/2016 - Checked on pumpstations after wind storm.
25	3/30/2016 - Went to Lincoln St easement to locate m/h 10-95.
26	
27	
<b>Non- Contractual Work</b>	
1	3/28/2016 - Camera work on lateral for the town at 530 Rt 68 house. 55 feet.
2	
3	



Sent Certified mail #7014 1200 0002 2236 9982 on April 14, 2016

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

April 14, 2016

**Re: March 2016 Reports for Naugatuck, CT WPCF, NPDES # CT0100641**

Dear Sir/Madam:

Enclosed please find the *Monthly Operating Report* for March 2016. The *Nutrients Analysis Report for Compliance with General Permit for Nitrogen Discharges* and the *Discharge Monitoring Report* was submitted electronically. The incinerator did not operate during the month of March 2016.

The March 30<sup>th</sup> Influent and Final Effluent Selenium analytical was not available at the time of this report. A revised report will be submitted once the analytical data is received.

Also enclosed is a summary of sludge sources received at this facility during the month of March 2016.

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

Sincerely,  
Veolia Water North America – Northeast, LLC

A handwritten signature in black ink, appearing to read "Chris Makuch", written over a horizontal line.

Christopher Makuch  
Assistant Plant Manager

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

Units	Daily Flow		Primary Sludge		Aeration Tank #1		Return Sludge		Aeration Tank #2		Return Sludge		Waste Sludge		Dry Solids to Incineration		Waste Accepted		CBOD (5-Day)					
	Max.	Min.	Vol.	% solid	MLSS	SVI	High D.O.	Low D.O.	MLSS	SVI	High D.O.	Low D.O.	% Flow	% Solids	lbs	Wk Day	lbs	Wk Day	Septic	Indust	Inf.	Prim eff.	Final eff.	
mgd	mgd	mgd	s	wt.	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	gal	gal	gal	gal	gal	gal	mg/l	mg/l	mg/l	mg/l	
Freq	Daily	Daily	Work Day	Work Day	Work Day	4/ work day	4/ work day	Work Day	Work Day	Work Day	4/Work Day	4/Work Day	Work Day	Work Day	Wk Day	Wk Day	Wk Day	Work Day	Work Day	3/week	3/week	3/week	3/week	
1	7.4	4.7	6.3	0.420			3.0	1.0	159	0.99	8,408	65	2.6	0.2	159	1.29	5,819	0	19,500	100	86	<4		
2	8.1	5.3	6.6	0.413			3.0	1.0	182	1.05	5,740	105	3.8	0.2	182	1.23	7,758	0	8,000					
3	7.3	4.6	6.2	0.394			3.0	0.9	124	0.88	6,648	87	2.2	0.9	124	0.43	4,458	0	28,500					
4	7.1	4.5	6.1	0.386			3.0	0.9	158	1.02	6,808	65	2.1	0.9	158	0.93	6,635	0	9,000					
5	7.2	4.5	5.9	0.410			3.0	0.7	167				2.2	0.5	167		4,562	0	4,000					
6	6.9	4.0	5.6	0.453			5.0	0.8	193				5.0	0.9	193		6,635	0	1,000			<4		
7	6.8	3.8	5.6	0.437			3.3	1.0	159	0.94	7,604	83	2.2	0.8	159	0.83	6,023	0	27,250			<4		
8	6.8	3.9	5.9	0.441			3.0	0.8	173	0.83	7,512	87	2.1	0.8	173	0.88	5,819	0	26,250			<4		
9	11.9	3.6	6.5	0.445					149	0.76	8,096	79	2.7	0.5	149	1.02	12,114	0	17,250					
10	7.8	5.0	6.3	0.403					143	0.88	7,468	78	2.1	1.0	143	1.37	19,140	0	22,500					
11	6.3	1.1	3.7	0.374					269	1.25	6,944	104	2.0	0.9	269	0.91	5,512	0	29,500					
12	8.4	1.5	4.8	0.438					161				2.0	1.0	161		11,025	0	3,000					
13	6.2	3.4	5.1	0.439			2.5	1.2	132				2.1	1.0	132		11,025	0	0					
14	3.6	6.4	5.2	0.434			2.5	1.2	144	0.72	7,464	60	2.5	1.1	144	1.13	3,934	0	28,750			<4		
15	6.6	4.0	5.4	0.469			5.0	0.8	129	0.76	3,916	115	5.0	0.3	129	1.16	0	0	26,750			<4		
16	6.3	3.7	5.1	0.478			2.5	1.3	141	0.79	6,508	69	3.7	1.1	141	0.94	0	0	39,250			<4		
17	6.6	3.8	5.3	0.477			2.6	1.3	129	0.66	5,652	85	4.2	1.1	129	1.18	0	0	31,750					
18	6.3	3.5	5.1	0.476			5.0	1.0	146	0.67	3,900	154	5.0	1.0	146	1.16	0	0	25,000					
19	6.3	3.3	4.9	0.477			2.6	1.1	145				2.8	0.9	145		0	0	10,500					
20	6.3	3.3	4.9	0.471			2.7	1.0	149				2.4	1.1	149		0	0	0					
21	6.1	1.7	4.4	0.420			2.7	1.0	189	0.72	5,104	114	2.4	1.1	189	1.21	0	0	24,500			<4		
22	5.8	3.1	4.8	0.475			2.6	1.1	217	0.75	5,632	107	2.4	0.5	217	0.50	1,063	0	31,000			<4		
23	5.9	3.5	4.9	0.467			2.6	1.1	199	0.78	5,912	85	2.9	0.5	199	0.80	1,344	0	24,000			<4		
24	6.0	3.5	4.8	0.476			5.0	0.7	205	0.79	4,436	77	5.0	0.6	205	0.63	604	0	26,750					
25	6.5	3.5	4.9	0.466			2.8	0.4	196	0.82	5,352	88	4.4	0.2	196	0.64	621	0	16,250					
26	6.4	3.3	4.7	0.478			3.3	0.7	203				2.8	0.7	203		621	0	13,000					
27	6.0	2.8	4.5	0.473			3.3	0.7	216				2.8	0.7	216		621	0	0					
28	6.5	3.1	5.2	0.487			3.6	1.2	186	0.83	6,256	96	2.6	1.1	186	0.90	1,104	0	24,050			<4		
29	6.2	3.4	5.0	0.461			3.0	0.8	193	0.88	6,496	100	2.7	1.2	193	1.22	1,786	0	34,500			<4		
30	6.1	3.9	4.9	0.466			3.0	0.7	196	0.89	6,352	87	2.8	1.0	196	0.93	2,322	0	32,000			<4		
31	6.3	3.3	4.9	0.437			2.9	0.8	199	0.87	4,664	142	2.2	0.5	199	0.84	2,909	0	26,500					
Total	208.0	113.0	163.46														123,455	0	610,300					
Ave.	6.7	3.6	5.27	0.446			3.2	0.9	173	0.91	6,212	93	3.0	0.8	173	0.96	3,982	0	19,687			173	125	4

Page 2 of 4 of MOR for Naugatuck WPCF

Units	Suspended Solids		Settleable Solids Eff.	Turbidity		Chlorine Dose		Chlorine Residual		Chlorine Residual Average	Fecal Coliform	E. Coli	Ammonia		Nitrite		Nitrate		TKN				
	Inf.	Prim Eff.		Final Eff.	mg/l	NTU	lbs	4/Work Day	high				low	mg/l	3/week	Mthly	3/wk	Inf.	Prim Eff.	Final Eff.	Inf.	Prim Eff.	Final Eff.
Freq.	3/week	mg/l	Wk Day	Wk Day	Wk Day	4/Work Day	mg/l	4/work day	mg/l	4/wk day	#/100ml	#/100ml	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	Monthly	
1	220	64	<5	0.0	1.9	0.00	0.00	0.00					15.30	20.8	2.20	0.060	0.070	0.52	0.16	2.040	27.00	28.50	3.210
2				0.0	3.0	0.00	0.00																
3				0.0	12.6	0.00	0.00																
4				0.0	4.1	0.00	0.00																
5						0.00	0.00																
6	130		<5			0.00	0.00						15.20		4.44	0.200	0.090	1.33		2.630	24.30		5.740
7	210		<5	0.0	1.9	0.00	0.00						17.00		2.12	0.190	0.100	1.30		2.780	28.60		3.630
8	190	140	<5	0.0	2.1	0.00	0.00						14.60		0.81	0.220	0.080	0.90		2.510	26.60		2.020
9				0.0	2.3	0.00	0.00																
10				0.0	2.8	0.00	0.00																
11				0.0	3.4	0.00	0.00																
12						0.00	0.00																
13						0.00	0.00																
14	180		<5	0.0	1.9	0.00	0.00						18.60		0.62	0.210	0.130	0.11		2.700	32.10		2.270
15	1,100		<5	0.0	1.8	0.00	0.00						19.10		0.42	0.170	0.080	0.17		2.610	37.20		1.610
16	300	240	<5	0.0	2.8	0.00	0.00						19.30		0.94	0.020	0.150	<0.02		2.250	34.10		2.330
17				0.0	2.4	0.00	0.00																
18				0.0	2.9	0.00	0.00																
19						0.00	0.00																
20						0.00	0.00																
21	450		<5	0.0	1.7	0.00	0.00						19.40		0.26	0.140	0.060	0.65		2.430	35.70		1.770
22	310		<5	0.0	1.8	0.00	0.00						16.00		0.50	0.010	0.100	<0.02		2.820	27.20		1.780
23	220	140	<5	0.0	2.2	0.00	0.00						19.60		0.16	0.010	0.040	<0.02		2.380	36.70		1.130
24				0.0	1.9	0.00	0.00																
25				0.0	2.7	0.00	0.00																
26						0.00	0.00																
27						0.00	0.00																
28	420		<5	0.0	2.3	0.00	0.00						20.40		0.11	0.030	0.010	<0.02		2.080	43.00		1.330
29	260		<5	0.0	3.9	0.00	0.00						19.50		<0.05	0.030	0.010	<0.02		2.410	32.70		1.050
30	230	120	<5	0.0	3.3	0.00	0.00						21.00		0.16	0.020	0.020	<0.02		2.440	33.40		1.060
31				0.0	2.7	0.00	0.00																
Total																							
Ave.	325	141	5	0.0	3.0	0.00	0.00						18.08	20.8	0.98	0.101	0.070	0.39	0.16	2.468	32.20	28.50	2.225

Page 3 of 4 of MOR for Naugatuck WPCF

Units	Total N		Total N D.O.	pH		Total P		Total P	Ortho P		Temp.	Arsenic		Copper	Nickel		Selenium				
	Inf.	Final Eff.		Eff.	Inf.	Eff.	Inf.		Final Eff.	Inf.		Final Eff.	Inf.		Eff.	Inf.	Eff.	Inf.	Eff.		
Flow	mg/l	Monthly	lb/d	mg/l	S.U.	Work Day	Nov-March (Monthly) (April-October) 2/week	mg/l	Apr - Oct	Nov-March (Monthly) (April - October) 2/week	Work day	mg/l	Weekly	mg/l	Mthly	kg/day	Weekly	kg/day	Weekly		
1	27.6	28.7	5.3	278	8.9	7.3	6.7	2.79	1.26	66	1.24	1.13	54	55	<0.0040	0.009	0.30	0.12	0.12	0.02	
2					8.2	7.2	6.8						56	57							
3					9.2	7.3	6.8						54	51							
4					9.2	7.3	6.8						53	54							
5																					
6	25.8		8.5	397				2.28	107		1.87										
7	30.1		6.5	304	8.9	7.3	6.8						55								
8	27.7		4.6	223	9.0	7.3	6.7	1.62	79		1.47	55	56	<0.0040	<0.004	0.06	0.11	1.10	0.22		
9					8.6	7.4	6.7						56	57							
10					7.7	7.3	6.7						57	59							
11					8.4	7.4	6.8						56	59							
12																					
13																					
14	32.4		5.1	221	8.9	7.7	7.0	2.59	112		2.31	57	58								
15	37.5		4.3	194	9.1	7.6	7.0					57	57								
16	34.1		4.7	200	8.6	7.6	6.9	3.15	134		2.98	59	57	<0.0040	<0.004	0.17	0.13	0.10	0.02		
17					9.0	7.4	6.8						56	58							
18					9.1	7.3	6.7						56	58							
19																					
20																					
21	36.5		4.3	158	9.2	7.7	6.8	2.65	97		2.48	56	56								
22	27.2		4.7	188	9.0	7.5	6.9					56	57								
23	36.7		3.6	147	9.1	7.5	6.9	2.80	114		2.48	56	58	<0.0040	<0.004	0.34	0.71	0.09	0.02		
24					9.2	6.7	6.9						58	56							
25					9.1	7.5	6.9						55	57							
26																					
27																					
28	43.1		3.4	147	9.1	7.6	6.9	1.86	80		1.71	56	58								
29	32.8		3.5	146	9.1	7.4	6.7					57	58								
30	33.4		3.5	143	8.8	7.4	6.9	2.50	103		2.26	58	59	<0.0040	<0.004	0.22	0.38				
31					9.1	7.3	6.8						58	59							
Total																					
Ave.	32.7	28.7	4.8	211	8.9	7.4	6.8	2.79	2.30	99	1.24	2.08	56.2	56.9	0.0040	0.009	0.22	0.29	0.35	0.07	

Page 4 of 4 of MOR for Naugatuck WPCF

		Zinc		Alkalinity	
		Inf.	Eff.	Pri. Eff.	Eff.
Units	kg/day			mg/l	
Freq.	Weekly			Monthly	
1	2.27	2.108	100	70	
2			110	60	
3			110	70	
4			120	60	
5					
6					
7			120	60	
8	2.84	1.797	120	50	
9			140	60	
10			140	70	
11			150	60	
12					
13					
14			130	60	
15			160	60	
16	6.76	1.227	120	70	
17			170	60	
18			140	60	
19					
20					
21			150	70	
22			150	60	
23	6.13	1.520	170	80	
24			150	70	
25			160	80	
26					
27					
28			150	60	
29			150	60	
30	4.02	1.426	140	60	
31			180	70	
Total					
Ave.	4.40	1.615	140	64	

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.

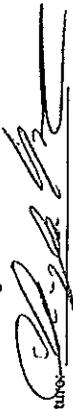
Authorized Official:

Christopher Makuch

Title:

Assistant Plant Manager

Signature:



Date:

4/14/2014

**March 2016 Sludge Data**

<b>Source</b>	<b>Gallons</b>	<b>Wet Tons</b>
Beacon Falls	123,500	
Bedford Hills	13,000	
Bristol		391.04
Heritage Village Water	45,500	
Litchfield	39,000	
Lynwood Place	26,000	
Mahopac Sludge & Septic	263,800	
New Hartford	26,000	
North Canaan	65,000	
North Haven	71,500	
Ossining	136,500	
Pawling	52,000	
Peekskill	110,500	
Plymouth	97,500	
Port Chester	279,000	
Poughkeepsie	292,500	
Redding	13,000	
Rhinebeck WPCF		18
Ridgefield	97,500	
Salisbury	91,000	
Seymour Cake		7.8
Southbury	149,500	
Southington	45,500	
Stratford	403,000	
Thomaston Treatment	39,000	
Torrington	286,000	
Westport	152,397	
Windham	117,000	
<b>Totals</b>	<b>3,035,197</b>	<b>416.84</b>



**DMR Copy of Record**

**Permit #:** CT0100641  
**Major:** Yes  
**Permitted Features:** 001 External Outfall  
**Report Dates & Status:**  
**Monitoring Period:** From 03/01/16 to 03/31/16  
**Considerations for Form Completion**

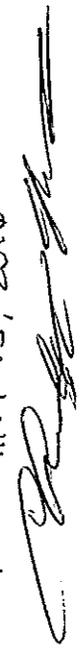
**Permittee:** NAUGATUCK WPCF  
**Permittee Address:** 500 CHERRY STREET, NAUGATUCK, CT 06770  
**Discharge:** 001-1 SANITARY SEWAGE  
**DMR Due Date:** 04/15/16  
**Facility:** NAUGATUCK BOROUGH OF  
**Facility Location:** 500 CHERRY STREET, NAUGATUCK, CT 06770  
**Status:** NetDMR Validated

**Principal Executive Officer**  
**First Name:** John  
**Last Name:** Batorki  
**No Data Indicator (NODI)**  
**Form NODI:**

**Title:** Plant Manager  
**Telephone:** 203-723-1433

**Monitoring Location Season** **Param. NODI**

Code	Parameter Name	Monitoring Location	Season	Param. NODI	Quantity or Loading			Quality of Concentration			Units	Ex.	Frequency of Analysis	Sample Type
					Value 1	Qualifier 1	Value 2	Value 3	Qualifier 2	Value 2				
00011	Temperature, water deg. Fahrenheit	W - Sew Comments	0	-								15 - deg F	01/00 - Once Every 2 Months	GR - GRAB
00059	Flow rate	1 - Effluent Gross	0	-	5.3	=	11.9	03 - ROD						
00000	Oxygen, dissolved [DO]	1 - Effluent Gross	0	-		=	7.7	03 - ROD						
00010	BOD, 5-day, 20 deg. C	T - Sew Comments	1	-		=	5	INST MIN						
00400	pH	1 - Effluent Gross	0	-		=	6.7	03 - ROD						
00400	pH	S - Sew Comments	0	-		=	6.0	03 - ROD						
00400	pH	W - Sew Comments	0	-		=	6.0	03 - ROD						
00500	Solids, total suspended	1 - Effluent Gross	0	-		=	30	MO AVG						
00500	Solids, total suspended	G - Raw Sewage Influent	0	-		=	325	Req Mon MO AVG						
00500	Solids, total suspended	T - Sew Comments	1	-		=	19	mg/L						

Sent electronically on April 15, 2016  


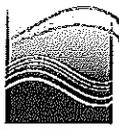












Connecticut Department of  
**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

**To:** Connecticut Municipalities with Sewage Treatment Facilities  
Covered under the General Permit for Nitrogen Discharges

**From:** Betsey Wingfield, Chairman *BW*  
Nitrogen Credit Advisory Board

**Date:** April 6, 2016

**Subject:** Invoice Notification  
Purchase or Sale of Equivalent Nitrogen Credits for 2015

The Connecticut Department of Energy and Environmental Protection, working with the Nitrogen Credit Advisory Board, have established a Nitrogen Credit Exchange Program and General Permit to comply with Sections 22a-521 through 22a-527 of the General Statutes of Connecticut (The Nitrogen Reduction Program in Connecticut for Long Island Sound).

The Nitrogen Credit Advisory Board established the annual value for an equivalent nitrogen credit at \$7.14 for calendar year 2015. This value was derived as specified in Section 22a-527(b) by dividing the total annual project cost for nitrogen removal projects at Connecticut sewage treatment facilities by the reduction in equivalent pounds of nitrogen achieved.

The Department issued a draft ruling on March 18, 2016 proposing formal adoption of the Board's recommended value at \$7.14 for an equivalent nitrogen credit in calendar year 2015. The Department did not receive a petition for review of the proposed value therefore the value of \$7.14 for an equivalent nitrogen credit in calendar year 2015 is now final.

In accordance with Section 22a-524(c)(1) I am hereby notifying each publicly owned treatment works of their equivalent nitrogen credit balance for calendar year 2015. Enclosed is the final invoice for the purchase or sale of equivalent nitrogen credits for calendar year 2015.

If your municipality removed more nitrogen than was required in the General Permit for 2015, the enclosed invoice itemizes the total credits to be sold. The Nitrogen Credit Exchange will issue a check in the amount shown on the invoice to the Water Pollution Control Authority of the municipality on or before August 15, 2016. No further action is required by the municipality to receive this payment. \*

If your municipality discharged more nitrogen than allowed by the 2015 limit for the facility in the General Permit the invoice enclosed itemizes the total credits that must be purchased. *Payment must be made on or before July 31, 2016* by check stating on its face: "Nitrogen Credit Purchase". Payment should be mailed to:

State of Connecticut, Office of the Treasurer  
6<sup>th</sup> Floor, 55 Elm Street  
Hartford, CT 06106  
Attn: Clean Water Fund Financial Administrator

If payment of the invoice is not received by July 31, 2016, the municipality's sewage treatment facility will be considered out of compliance with the annual limits of the General Permit and subject to the enforcement provisions of Chapter 446k of the Connecticut General Statutes.

Should you have any questions or believe there is an error on the invoice, please contact Iliana Raffa of the Department's Water Protection and Land Reuse Bureau at (860) 424-3754 or e-mail at (Iliana.Raffa@ct.gov).

cc: Nitrogen Credit Advisory Board Members  
Enclosures  
2015 Nitrogen Invoice Notification

# Long Island Sound Nutrient Reduction Program Final Credit Exchange Invoice - 2015

NAUGATUCK TREATMENT Co. CT0100641

**End-of-Pipe TN  
Discharged (lbs/day)**

January	236
February	218
March	230
April	271
May	218
June	160
July	150
August	186
September	124
October	117
November	130
December	145
<b>Annual Avg</b>	<b>182 (lbs/day)</b>

**Credit Exchange Calculation**

a. Permit Limit	246.000
b. Annual Avg	182.000
c. E-Factor	0.600
d. Credits (b - a) x c	-38.400
e. Cost / Credit	7.14
2010 Adjustment	
f. Annual Invoice *	<b>-\$100,074</b>

\* Credits(d) x Cost of Credit(e) x 365 days  
(negative value indicates payment to municipality)

**PLEASE SEND PAYMENTS TO:**

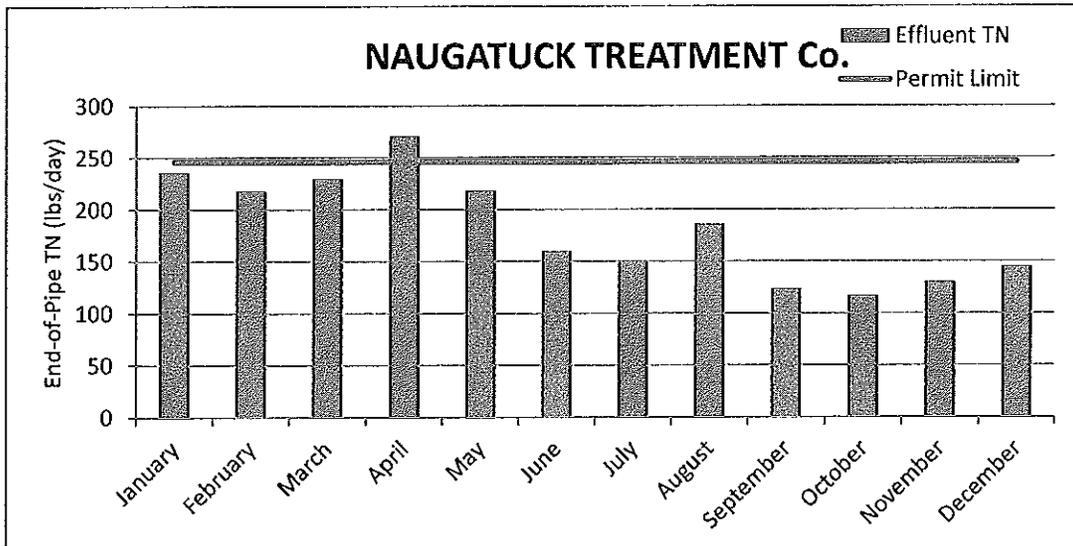
State of Connecticut, Office of the Treasurer  
6th Floor, 55 Elm Street  
Hartford, CT 06106  
Attn: Clean Water Fund Financial Administrator

The Commissioner will purchase credits by  
August 16, 2016, in the amount of:

\$100,074



**Monthly Discharge of TN vs. 2015 Permit Limit**





### Notice of Proposed Value of an Equivalent Nitrogen Credit for 2015

To: Connecticut Municipalities with Sewage Treatment Facilities

From: Michael J. Sullivan, Deputy Commissioner Department of Energy and Environmental Protection  
Betsey Wingfield, Chair, Nitrogen Credit Advisory Board

The Connecticut Department of Energy and Environmental Protection, working with the Nitrogen Credit Advisory Board, has established a Nitrogen Credit Exchange Program and General Permit to comply with Sections 22a-521 through 22a-527 of the General Statutes of Connecticut (The Nitrogen Reduction Program in Connecticut for Long Island Sound).

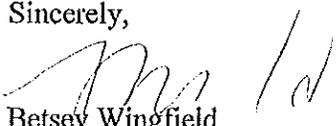
Under the exchange program, the cost of a credit is calculated on an annual basis. Accordingly, pursuant to Section 22a-527(b), the Nitrogen Credit Advisory Board hereby gives notice that it proposes an annual value for an equivalent nitrogen credit of \$7.14 for calendar year 2015. This value was derived, as specified in Section 22a-527(b), by dividing the total annual project cost for nitrogen removal projects at Connecticut sewage treatment facilities by the reduction in equivalent pounds of nitrogen achieved.

The Commissioner of the Department of Environmental Protection hereby issues a draft ruling accepting the Board's proposal of a value of \$7.14 for an equivalent nitrogen credit in calendar year 2015. You have until March 31, 2016 to review the data. Please look over the data for your facility and if you have any questions or objections please contact Iliana Raffa at the number listed below.

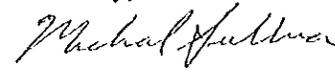
Pursuant to Section 22a-527(c), the Commissioner's draft ruling shall become final if no municipality or group of municipalities petition for a review of the proposed value of an equivalent nitrogen credit within 15 business days after the issuance date of the Commissioner's draft ruling.

Enclosed with this notice is a table that lists the facilities that will be buying and selling nitrogen credits under this program for the year 2015. Should you have any questions please contact Ms. Iliana Raffa of the Department's Water Protection and Land Reuse Bureau at 860-424-3758 or email Ms. Raffa at [iliana.raffa@ct.gov](mailto:iliana.raffa@ct.gov).

Sincerely,

  
Betsey Wingfield  
Chairman, Nitrogen Credit Advisory Board

Sincerely,

  
Michael J. Sullivan,  
Deputy Commissioner  
Date: March 18, 2016

cc:

April Capone, Office of Policy Management  
Astrid T. Hanzalek, Suffield  
William Norton, West Haven  
Joseph Michelangelo, Fairfield  
Thomas Tylor, Metropolitan District Commission  
Guy P. Russo, Middletown



Sent via certified mail #7014 1200 0002 2236 9746 on March 10, 2016

March 10, 2016

Connecticut Department of Energy and Environmental Protection  
Mr. John Degirolamo  
Bureau of Air Management  
79 Elm Street  
Hartford, CT 06106-5127

Subject: Naugatuck Stack Test Correction

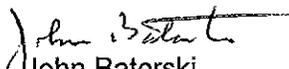
Dear Mr. Degirolamo:

The 2015 incinerator emission test did not indicate the correct dry ton feed rate. This error was totally mine as I did not catch it during the review process. The test was conducted at the correct feed rate however that feed rate was not inserted in the correct location. We contacted CK Environmental and requested they inserted/recalculate the appropriate parameters as needed. There was one calculation that was affected, the VOC was based off the DT, and was changed. In summary, the pages changed were: 9-12, 19 & 20, 35 & 36. I attached the entire revised report (49 pages). In addition, for your convenience are the sheets with the corrections highlighted in yellow and signed/dated as a revision.

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

Sincerely,

Veolia Water North America-Northeast, LLC

  
John Batorski  
Project Manager

Enclosure: Stack Test report dated March 8, 2016 (pages 1 -49)  
Actual pages that were changed with notations/signatures.

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



### 3.3 PROBLEMS AND CHANGES

There were no problems or changes that occurred during this test program.

### 3.4 PRESENTATION OF RESULTS

The results of the Emissions Compliance Testing Program indicate that the emissions from FBI are within the allowable limits set forth for this facility by the CTDEEP. Tables 3-2 through 3-5 provide individual test run results and data.

**Table 3-2**  
Summary of THC Results  
WESP on

Test Run No.		Incinerator Out Metals-1	Incinerator Out Metals-2	Incinerator Out Metals-3	Average	Facility Permit Limit
Date		09/22/15	09/22/15	09/22/15		
Time	Start	8:50	10:12	11:40		
	Stop	9:50	11:12	12:40		
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	14,251	13,891	13,851	13,998	
Temperature	(°F)	201.4	200.0	200.1	200.5	
Moisture	(%)	10.1	11.4	12.1	11.2	
Oxygen	(%)	7.75	7.56	7.41	7.6	
Carbon Dioxide	(%)	11.24	10.77	11.15	11.1	
<b>Gaseous Emissions</b>						
Volatile Organic Compounds	(ppm)	0.85	1.04	0.90	0.93	0.32
	(lb/hr)	0.08	0.10	0.09	0.09	
	(lb/D/T)	0.026	0.031	0.025	0.027	
	(tons/yr)	0.36	0.43	0.37	0.39	

*Revised 3-9-16*  
*J. Butala*



**Table 3-3**  
**Summary of Metals Results**  
**WESP on**

Test Run No.		Incinerator Out Metals-1	Incinerator Out Metals-2	Incinerator Out Metals-3		Facility Permit
Date		09/22/15	09/22/15	09/22/15		
Time	Start	8:50	11:40	14:15	Average	Limit
	Stop	10:53	13:45	16:20		
<b>Sample Conditions</b>						
Volume	(dscf)	87.44	86.01	88.67		
	(dscm)	2.476	2.436	2.511		
Isokinetics	(%)	94.5	95.3	98.6		
Stack Feedrate	(dry Ton/hr)	3.21	3.24	3.48	3.31	
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	14,251	13,891	13,851	13,998	
Temperature	(°F)	201.4	200.0	200.1	200.5	
Moisture	(%)	10.1	11.4	12.1	11.2	
Oxygen	(%)	7.75	7.56	7.41	7.57	
Carbon Dioxide	(%)	11.24	10.77	11.15	11.1	
<b>Trace Metals</b>						
Arsenic (As) Catch	(mg)	0.001	0.002	0.001	0.001	
As Concentration	(ug/dscm)	0.323	0.591	0.319	0.411	95.4
As Emission Rate	(lb/hr)	0.00002	0.00003	0.00002	0.00002	
Beryllium (Be) Catch	(mg)	0.000	0.000	0.000	0.000	
Be Concentration	(ug/dscm)	0.0808	0.0821	0.0796	0.0808	19.1
Be Emission Rate	(lb/hr)	4.31E-06	4.27E-06	4.13E-06	4.24E-06	
Be Emission Rate	(lb/day)	0.00010	0.00010	0.00010	0.00010	0.022
Cadmium (Cd) Catch	(mg)	0.000	0.002	0.000	0.001	
Cd Concentration	(ug/dscm)	0.08	0.74	0.08	0.30	763.5
Cd Emission Rate	(lb/hr)	0.00000	0.00004	0.00000	0.00002	
Chromium (Cr) Catch	(mg)	0.008	0.011	0.006	0.0083	
Cr Concentration	(ug/dscm)	1.86	3.37	1.15	2.13	4771.8
Cr Emission Rate	(lb/hr)	0.00010	0.00018	0.00006	0.00011	
Copper (Cu) Catch	(mg)	0.020	0.018	0.010	0.0161	
Cu Concentration	(ug/dscm)	0.42	3.97	0.10	1.50	38,174.8
Cu Emission Rate	(lb/hr)	0.00035	0.00031	0.00014	0.00027	
Lead (Pb) Catch	(mg)	0.004	0.031	0.004	0.013	
Pb Concentration	(ug/dscm)	1.54	12.29	1.53	5.12	5,726.2
Pb Emission Rate	(lb/hr)	0.00008	0.00064	0.00008	0.0003	
Manganese (Mn) Catch	(mg)	0.010	0.086	0.015	0.037	
Mn Concentration	(ug/dscm)	2.53	33.65	4.72	13.63	38,174.8
Mn Emission Rate	(lb/hr)	0.00013	0.00175	0.00024	0.00071	
Mercury (Hg) Catch	(mg)	0.026	0.193	0.221	0.147	
Hg Concentration	(ug/dscm)	10.59	79.15	87.76	59.16	1,908.7
Hg Emission Rate	(lb/hr)	0.00056	0.0041	0.00455	0.0031	
Hg Emission Rate	(lb/day)	0.0136	0.0988	0.1092	0.0738	7.055
Nickel (Ni) Catch	(mg)	0.014	0.016	0.014	0.015	
Ni Concentration	(ug/dscm)	4.74	5.76	4.51	5.00	9,543.7
Ni Emission Rate	(lb/hr)	0.00025	0.00030	0.00023	0.00026	
Selenium (Se) Catch	(mg)	0.026	0.024	0.022	0.024	
Se Concentration	(ug/dscm)	9.89	9.48	8.44	9.27	7,635.0
Se Emission Rate	(lb/hr)	0.00053	0.00049	0.00044	0.00049	
Zinc (Zn) Catch	(mg)	0.132	0.291	0.086	0.170	
Zn Concentration	(ug/dscm)	51.29	117.41	32.26	66.99	190,873.9
Zn Emission Rate	(lb/hr)	0.0027	0.0061	0.0017	0.0035	

*Revised 3-9-16*  
 Page 10 of 247 *John Burt*



**Table 3-4**  
**Summary of THC Results**  
**WESP off**

Test Run No.		Incinerator Out Metals-4	Incinerator Out Metals-5	Incinerator Out Metals-6		Facility Permit
Date		09/23/15	09/23/15	09/23/15		
Time	Start	8:00	9:18	10:30	Average	Limit
	Stop	9:00	10:18	11:30		
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	13,791	14,274	14,122	14,062	
Temperature	(°F)	221.2	231.1	239.0	230.4	
Moisture	(%)	14.1	14.7	16.0	14.9	
Oxygen	(%)	7.14	7.09	7.26	7.2	
Carbon Dioxide	(%)	11.95	11.83	11.60	11.8	
<b>Gaseous Emissions</b>						
Volatile Organic Compounds	(ppm)	1.94	2.57	1.70	2.07	0.32
	(lb/hr)	0.18	0.25	0.16	0.20	
	(lb/DI)	0.06	0.07	0.05	0.06	
	(tons/yr)	0.80	1.10	0.72	0.88	

*Revised 3-9-16*  
*J. Butcher*



**Table 3-5**  
**Summary of Metal Results**  
**WESP off**

Test Run No.		Incinerator Out Metals-4	Incinerator Out Metals-5	Incinerator Out Metals-6		Facility Permit
Date		09/23/15	09/23/15	09/23/15		
Time	Start	8:00	10:30	13:00	Average	Limit
	Stop	10:02	12:35	15:06		
<b>Sample Conditions</b>						
Volume	(dscf)	89.52	92.89	92.06		
	(dscm)	2.535	2.631	2.607		
Isokinetics	(%)	99.3	99.5	99.7		
Sludge Feedrate	(dry Ton/hr)	2.97	3.49	3.20	3.22	
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	13,791	14,274	14,122	14,062	
Temperature	(°F)	221.2	231.1	239.0	230.4	
Moisture	(%)	14.1	14.7	16.0	14.9	
Oxygen	(%)	7.14	7.09	7.26	7.2	
Carbon Dioxide	(%)	11.95	11.33	11.60	11.8	
<b>Trace Metals</b>						
Arsenic (As) Catch	(mg)	0.001	0.003	0.002	0.002	
As Concentration	(ug/dscm)	0.383	0.981	0.625	0.663	95.4
As Emission Rate	(lb/hr)	0.00002	0.00005	0.00003	0.00004	
Beryllium (Be) Catch	(mg)	0.000	0.000	0.000	0.000	
Be Concentration	(ug/dscm)	0.079	0.076	0.077	0.077	19.1
Be Emission Rate	(lb/hr)	4.07E-06	4.06E-06	4.06E-06	4.06E-06	
Be Emission Rate	(lbs/day)	0.00010	0.00010	0.00010	0.00010	0.022
Cadmium (Cd) Catch	(mg)	0.000	0.000	0.000	0.000	
Cd Concentration	(ug/dscm)	0.0789	0.0836	0.0767	0.0797	763.5
Cd Emission Rate	(lb/hr)	0.00000	0.00000	0.00000	0.00000	
Chromium (Cr) Catch	(mg)	0.007	0.009	0.006	0.0073	
Cr Concentration	(ug/dscm)	1.58	2.15	1.20	1.64	4771.8
Cr Emission Rate	(lb/hr)	0.00008	0.00011	0.00006	0.00009	
Copper (Cu) Catch	(mg)	0.011	0.019	0.023	0.0175	
Cu Concentration	(ug/dscm)	0.41	3.68	0.09	1.39	38,174.8
Cu Emission Rate	(lb/hr)	0.00015	0.00032	0.00039	0.00029	
Lead (Pb) Catch	(mg)	0.004	0.008	0.006	0.006	
Pb Concentration	(ug/dscm)	1.14	2.73	2.17	2.01	5,726.2
Pb Emission Rate	(lb/hr)	0.00006	0.00015	0.00011	0.0001	
Manganese (Mn) Catch	(mg)	0.035	0.041	0.022	0.033	
Mn Concentration	(ug/dscm)	12.45	14.31	7.04	11.27	38,174.8
Mn Emission Rate	(lb/hr)	0.00064	0.00076	0.00037	0.00059	
Mercury (Hg) Catch	(mg)	0.212	0.172	0.221	0.202	
Hg Concentration	(ug/dscm)	83.7381	65.2296	84.7457	77.9044	1,908.7
Hg Emission Rate	(lb/hr)	0.00432	0.0035	0.00448	0.0041	
Hg Emission Rate	(lbs/day)	0.10374	0.08365	0.10751	0.0983	7.055
Nickel (Ni) Catch	(mg)	0.021	0.009	0.007	0.012	
Ni Concentration	(ug/dscm)	7.39	2.71	1.93	4.01	9,543.7
Ni Emission Rate	(lb/hr)	0.00038	0.00014	0.00010	0.00021	
Selenium (Se) Catch	(mg)	0.035	0.036	0.040	0.037	
Se Concentration	(ug/dscm)	13.41	13.26	15.07	13.92	7,635.0
Se Emission Rate	(lb/hr)	0.00069	0.00071	0.00080	0.00073	
Zinc (Zn) Catch	(mg)	0.299	0.365	0.090	0.251	
Zn Concentration	(ug/dscm)	115.98	136.83	32.60	95.14	190,873.9
Zn Emission Rate	(lb/hr)	0.00599	0.00731	0.00172	0.00501	

*Revised 3-9-16 jh [signature]*



**Summary of Multiple-Metals Emissions Testing**  
 Yeolia Water North America LLC  
 FB Sludge Incinerator - WESP on  
 Naugatuck, Connecticut  
 September 22, 2015

Test Run No.		Incinerator Out Metals-1	Incinerator Out Metals-2	Incinerator Out Metals-3		Facility Permit
Date		09/22/15	09/22/15	09/22/15	Average	Limit
Time	Start	8:50	11:40	14:15		
	Stop	10:53	13:45	16:20		
<b>Sample Conditions</b>						
Volume	(dscf)	87.44	86.01	88.67	3.31	
	(dscm)	2.476	2.436	2.511		
Isokinetics	(%)	94.5	95.3	98.6		
Sludge Feedrate	(dry Ton/hr)	3.21	3.24	3.48		
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	14,251	13,891	13,851	13,998	
Temperature	(°F)	201.4	200.0	200.1	200.5	
Moisture	(%)	10.1	11.4	12.1	11.2	
Oxygen	(%)	7.75	7.56	7.41	7.57	
Carbon Dioxide	(%)	11.24	10.77	11.15	11.1	
<b>Trace Metals</b>						
Arsenic (As) Catch	(mg)	0.001	0.002	0.001	0.001	95.4
As Concentration	(ug/dscm)	0.323	0.591	0.319	0.411	
As Emission Rate	(lb/hr)	0.00002	0.00003	0.00002	0.00002	
Beryllium (Be) Catch	(mg)	0.000	0.000	0.000	0.000	19.1
Be Concentration	(ug/dscm)	0.0808	0.0821	0.0796	0.0808	
Be Emission Rate	(lb/hr)	4.31E-06	4.27E-06	4.13E-06	4.24E-06	
Be Emission Rate	(lbs/day)	0.00010	0.00010	0.00010	0.00010	
Cadmium (Cd) Catch	(mg)	0.000	0.002	0.000	0.001	763.5
Cd Concentration	(ug/dscm)	0.08	0.74	0.08	0.30	
Cd Emission Rate	(lb/hr)	0.00000	0.00004	0.00000	0.00002	
Chromium (Cr) Catch	(mg)	0.008	0.011	0.006	0.0083	4771.8
Cr Concentration	(ug/dscm)	1.86	3.37	1.15	2.13	
Cr Emission Rate	(lb/hr)	0.00010	0.00018	0.00006	0.00011	
Copper (Cu) Catch	(mg)	0.020	0.018	0.010	0.0161	38,174.8
Cu Concentration	(ug/dscm)	0.42	3.97	0.10	1.50	
Cu Emission Rate	(lb/hr)	0.00035	0.00031	0.00014	0.00027	
Lead (Pb) Catch	(mg)	0.004	0.031	0.004	0.013	5,726.2
Pb Concentration	(ug/dscm)	1.54	12.29	1.53	5.12	
Pb Emission Rate	(lb/hr)	0.00008	0.00064	0.00008	0.0003	
Manganese (Mn) Catch	(mg)	0.010	0.086	0.015	0.037	38,174.8
Mn Concentration	(ug/dscm)	2.53	33.65	4.72	13.63	
Mn Emission Rate	(lb/hr)	0.00013	0.00175	0.00024	0.00071	
Mercury (Hg) Catch	(mg)	0.026	0.193	0.221	0.147	1,908.7
Hg Concentration	(ug/dscm)	10.59	79.15	87.76	59.16	
Hg Emission Rate	(lb/hr)	0.00056	0.0041	0.00455	0.0031	
Hg Emission Rate	(lbs/day)	0.0136	0.0988	0.1092	0.0738	
Nickel (Ni) Catch	(mg)	0.014	0.016	0.014	0.015	9,543.7
Ni Concentration	(ug/dscm)	4.74	5.76	4.51	5.00	
Ni Emission Rate	(lb/hr)	0.00025	0.00030	0.00023	0.00026	
Selenium (Se) Catch	(mg)	0.026	0.024	0.022	0.024	7,635.0
Se Concentration	(ug/dscm)	9.89	9.48	8.44	9.27	
Se Emission Rate	(lb/hr)	0.00053	0.00049	0.00044	0.00049	
Zinc (Zn) Catch	(mg)	0.132	0.291	0.086	0.170	190,873.9
Zn Concentration	(ug/dscm)	51.29	117.41	32.26	66.99	
Zn Emission Rate	(lb/hr)	0.0027	0.0061	0.0017	0.0035	

*Revised 3-9-16*



**Summary of Gaseous Emissions Testing**  
**Veolia Water North America LLC**  
**FB Sludge Incinerator - WESP on**  
**September 22, 2015**

Test Run No.		Incinerator Out Metals-1	Incinerator Out Metals-2	Incinerator Out Metals-3		Facility Permit
Date		09/22/15	09/22/15	09/22/15		
Time	Start	8:50	10:12	11:40	Average	Limit
	Stop	9:50	11:12	12:40		
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	14,251	13,891	13,851	13,998	
Temperature	(°F)	201.4	200.0	200.1	200.5	
Moisture	(%)	10.3	11.4	12.1	11.2	
Oxygen	(%)	7.75	7.56	7.41	7.6	
Carbon Dioxide	(%)	11.24	10.77	11.15	11.1	
<b>Gaseous Emissions</b>						
Volatile Organic Compounds	(ppm)	0.85	1.04	0.90	0.93	0.32
	(lb/hr)	0.08	0.10	0.09	0.09	
	(lb/Dt)	0.026	0.031	0.025	0.027	
	(tons/yr)	0.36	0.43	0.37	0.39	

*Revised 3-9-16*  
*John B. [Signature]*



**Summary of Multiple-Metals Emissions Testing**  
 Veolia Water North America LLC  
 FB Sludge Incinerator - WESP off  
 Naugatuck, Connecticut  
 September 23, 2015

Test Run No.		Incinerator Out Metals-4	Incinerator Out Metals-5	Incinerator Out Metals-6		Facility Permit
Date		09/23/15	09/23/15	09/23/15	Average	Limit
Time	Start	8:00	10:30	13:00		
	Stop	10:02	12:35	15:06		
<b>Sample Conditions</b>						
Volume	(dscf)	89.52	92.89	92.06		
	(dscm)	2.535	2.631	2.607		
Isokinetics	(%)	99.3	99.5	99.7		
Sludge Feedrate	(dry Ton/hr)	2.97	3.49	3.20	3.22	
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	13,791	14,274	14,122	14,062	
Temperature	(°F)	221.2	231.1	239.0	230.4	
Moisture	(%)	14.1	14.7	16.0	14.9	
Oxygen	(%)	7.14	7.09	7.26	7.2	
Carbon Dioxide	(%)	11.95	11.83	11.60	11.8	
<b>Trace Metals</b>						
Arsenic (As) Catch	(mg)	0.001	0.003	0.002	0.002	
As Concentration	(ug/dscm)	0.383	0.981	0.625	0.663	95.4
As Emission Rate	(lb/hr)	0.00002	0.00005	0.00003	0.00004	
Beryllium (Be) Catch	(mg)	0.000	0.000	0.000	0.000	
Be Concentration	(ug/dscm)	0.079	0.076	0.077	0.077	19.1
Be Emission Rate	(lb/hr)	4.07E-06	4.06E-06	4.06E-06	4.05E-06	
Be Emission Rate	(lbs/day)	0.00010	0.00010	0.00010	0.00010	0.022
Cadmium (Cd) Catch	(mg)	0.000	0.000	0.000	0.000	
Cd Concentration	(ug/dscm)	0.0789	0.0836	0.0767	0.0797	763.5
Cd Emission Rate	(lb/hr)	0.00000	0.00000	0.00000	0.00000	
Chromium (Cr) Catch	(mg)	0.007	0.009	0.006	0.0073	
Cr Concentration	(ug/dscm)	1.58	2.15	1.20	1.64	4771.8
Cr Emission Rate	(lb/hr)	0.00008	0.00011	0.00006	0.00009	
Copper (Cu) Catch	(mg)	0.011	0.019	0.023	0.0175	
Cu Concentration	(ug/dscm)	0.41	3.68	0.09	1.39	38,174.8
Cu Emission Rate	(lb/hr)	0.00015	0.00032	0.00039	0.00029	
Lead (Pb) Catch	(mg)	0.004	0.008	0.006	0.006	
Pb Concentration	(ug/dscm)	1.14	2.73	2.17	2.01	5,726.2
Pb Emission Rate	(lb/hr)	0.00006	0.00015	0.00011	0.0001	
Manganese (Mn) Catch	(mg)	0.035	0.041	0.022	0.033	
Mn Concentration	(ug/dscm)	12.45	14.31	7.04	11.27	38,174.8
Mn Emission Rate	(lb/hr)	0.00064	0.00076	0.00037	0.00059	
Mercury (Hg) Catch	(mg)	0.212	0.172	0.221	0.202	
Hg Concentration	(ug/dscm)	83.7381	65.2296	84.7457	77.9044	1,908.7
Hg Emission Rate	(lb/hr)	0.00432	0.0035	0.00448	0.0041	
Hg Emission Rate	(lbs/day)	0.10374	0.08365	0.10751	0.0983	7.055
Nickel (Ni) Catch	(mg)	0.021	0.009	0.007	0.012	
Ni Concentration	(ug/dscm)	7.39	2.71	1.93	4.01	9,543.7
Ni Emission Rate	(lb/hr)	0.00038	0.00014	0.00010	0.00021	
Selenium (Se) Catch	(mg)	0.035	0.036	0.040	0.037	
Se Concentration	(ug/dscm)	13.41	13.26	15.07	13.92	7,635.0
Se Emission Rate	(lb/hr)	0.00069	0.00071	0.00080	0.00073	
Zinc (Zn) Catch	(mg)	0.299	0.365	0.090	0.251	
Zn Concentration	(ug/dscm)	115.98	136.83	32.60	95.14	190,873.9
Zn Emission Rate	(lb/hr)	0.00599	0.00731	0.00172	0.00501	

*Revised 3-9-16*  
*J. Butcher*



Summary of Gaseous Emissions Testing  
 Veolia Water North America LLC  
 FB Sludge Incinerator - WESP off  
 September 23, 2015

Test Run No.		Incinerator Out Metals-4	Incinerator Out Metals-5	Incinerator Out Metals-6		Facility Permit
Date		09/23/15	09/23/15	09/23/15		
Time	Start	8:00	9:18	10:30	Average	Limit
	Stop	9:00	10:18	11:30		
<b>Stack Conditions</b>						
Flow Rate	(dscfm)	13,791	14,274	14,122	14,062	
Temperature	(°F)	221.2	231.1	239.0	230.4	
Moisture	(%)	14.1	14.7	16.0	14.9	
Oxygen	(%)	7.14	7.09	7.26	7.2	
Carbon Dioxide	(%)	11.95	11.83	11.60	11.8	
<b>Gaseous Emissions</b>						
Volatile Organic Compounds	(ppm)	1.94	2.57	1.70	2.07	0.32
	(lb/hr)	0.18	0.25	0.16	0.20	
	(lb/D/T)	0.06	0.07	0.05	0.06	
	(tons/yr)	0.80	1.10	0.72	0.88	

Revised 3-9-16

*John Butcher*



**BOROUGH OF NAUGATUCK**  
**OFFICE OF MAYOR N. WARREN "PETE" HESS**

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Naugatuck, CT 06770  
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[www.naugatuck-ct.gov](http://www.naugatuck-ct.gov)  
[nwhess@naugatuck-ct.gov](mailto:nwhess@naugatuck-ct.gov)

March 7, 2016

Naugatuck Environmental Technologies LLC  
c/o Veolia North America  
53 State Street 14<sup>th</sup> Floor  
Boston, MA 02109  
**Via Email and Mail**  
Attention: Daniel L Gorka, Vice President

Dear Mr. Gorka:

Reference is made to your letter of March 4, 2016 concerning our impasse at the Treatment Plant.

It should first be noted that the EPA letter dated February 29, 2016 is not the comfort letter that the Borough is attempting to procure from EPA at your request. The letter from Mr. Rapp was not meant to resolve the issues associated with the continued operation of the incinerator after March 21, 2016. The Borough is continuing its efforts to obtain a comfort letter from EPA even though the letter is not necessary as was stated at our meeting in Boston. It is my understanding that EPA Region I is currently discussing this issue with Washington. We will keep you posted.

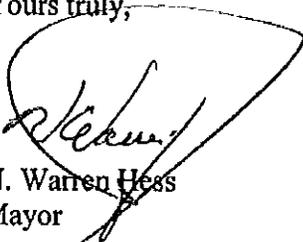
You are hereby advised that the Borough has no interest in being the assignee of your sludge contracts. It is our intention to complete the contract term with Naugatuck Environmental Technologies LLC / Veolia as operator of the incinerator.

It is also the position of the Borough that your decision to terminate all customer sludge contracts is not consistent with your obligations under the contract. A better course of action, consistent with your duty to mitigate damages would be to bring the incinerator into compliance by March 21, 2016 by diverting from the incinerator a sufficient number of customers with the highest sludge mercury content to achieve emissions standards for mercury, while minimizing revenue reduction. As discussed at EPA at the January 20, 2016 meeting, it was estimated that we could achieve compliance by diverting 5 or 6 customers. The Borough recognizes that a stack test will be necessary to confirm compliance and the Borough is willing to authorize and pay for such a test at the earliest possible time that such a test can be performed. While we are pursuing this course of action, the Borough will continue to implement its short term compliance plan and will

also finalize negotiation of an administrative settlement with EPA. It is anticipated that an administrative order can be finalized in approximately 4 months, at which time all customers diverted on an interim basis can resume incineration with Veolia. It is also possible that an interim administrative settlement can be achieved prior to March 21, 2016 in which case your proposed contract terminations would not be in the best interest of the Borough or Veolia. It seems to me that, sludge diversion of selected customers, if necessary, is a better course of action which will enable us not only to resolve our impasse but to work with each other on the long term facility issues relating to the future. A satisfactory response to this proposal will go a long way toward convincing me that we can work out our differences in a business manner. I am available for a meeting any day this week.

Please advise.

Yours truly,

A handwritten signature in black ink, appearing to read "N. Warren Hess", is written over a large, hand-drawn oval scribble.

N. Warren Hess  
Mayor

Cc: Jim Binder  
Jim Stewart  
Ned Fitzpatrick  
Tim Shearin



Veolia North America  
53 State Street, 14<sup>th</sup> Floor  
Boston, MA 02109

Tel. : (508) 436 - 7724  
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www.veolianorthamerica.com

March 10, 2016

The Honorable N. Warren Hess, III  
Borough of Naugatuck  
180 Church Street  
Naugatuck, CT 06770

Re: Termination or Assignment of Sludge Contracts

Dear Mayor Hess:

This responds to your letter dated March 7<sup>th</sup> regarding continued operation of the Incinerator past the March 21, 2016 MACT compliance deadline ("compliance date"):

1. Reduced Incinerator Operations:

Veolia is willing to consider the continued operation of the incinerator at reduced capacity, beyond the compliance date, provided the following issues are satisfactorily addressed in a timely manner:

- a. As you know, Veolia has raised significant technical concerns with Kleinfelder about your proposed approach in both our 1/13/16 conference call, discussing the Kleinfelder DRAFT Technical Memorandum (Task 11), which evaluated this operational methodology, and further during our post-EPA meeting on 1/20/16. To date, we have not received a response to these concerns. Along these lines, we have attached a technical question sheet for you to forward to Kleinfelder. Unfortunately, this is not a straight-forward technical approach and it is our understanding that Kleinfelder is also skeptical of this operational approach. Kleinfelder should finalize the Draft and incorporate responses to our questions for our review, as soon as possible. Assuming this approach is technically acceptable to Veolia, we will still require a stack test to confirm compliance, prior to operating beyond the compliance date.
- b. Based on state permit conditions, it is likely that there will be increased fuel usage as a result of the reduced capacity, and potential increases in chemical usage for sulfur control. The Borough must agree that it will reimburse Veolia for these additional costs, along with all of the costs associated with the required stack testing.
- c. As this effort is designed to mitigate future non-compliance, the Borough must agree that operations at reduced capacity constitute a Direct Quantity Restriction under the Lease for which Veolia will reduce the rent by the amount of diverted lost revenue. Based on Kleinfelder's Draft evaluation, it is estimated that the revenue reduction will be approximately equal to the entire monthly rent and our true revenue reduction will likely be greater than the monthly rent. In the case of the latter scenario, the Borough would be required to provide additional relief for

March 9, 2016

maintaining sludge contracts that have to be diverted to alternate disposal sites, as further discussed in Item 2, below.

- d. The Borough should recognize that, if this reduction is sustainable for four to six months, until such time that the anticipated Consent Agreement is negotiated, it is possible that the EPA could find this manner of mitigation precedent setting and require it as a condition of the consent agreement.

2. Assignment of Veolia - Customer Sludge Contracts to the Borough:

Veolia will notify all its customers of its intent to terminate existing sludge contracts, unless the Borough agrees to pay the differentials associated with decreased revenues and increased hauling and/or disposal costs.

Veolia has always worked in good faith with the Borough. As you are already aware, we have provided multiple notices and feedback regarding Veolia's unwillingness to operate out of compliance and of ways to mitigate the MACT upgrade. We remain hopeful that these issues can be satisfactorily resolved. Please advise if the conditions set forth herein are acceptable.

Thank you.

Very truly yours,

Daniel J. Gorka

Digitally signed by Daniel J. Gorka  
DN: cn=Daniel J. Gorka, o=Veolia Water North  
America - Northeast LLC  
email=daniel.gorka@veoliatechna.com, c=US  
Date: 2015.03.10 13:15:12 -05'00'

Daniel Gorka,  
Vice President, Naugatuck Environmental Technologies, LLC

March 10, 2016

**Questions Re-Presented to the Borough and Kleinfelder based on discussion of Kleinfelder's Draft Technical Memorandum, dated January 8, 2016.**

The following questions are based on discussions, comments, questions and concerns related to discussions on the above related document which were raised on a conference call on January 8, 2016 and a meeting between Veolia, the Borough, Kleinfelder and TRC on January 20<sup>th</sup>, 2016.

1. The mercury / sludge table identified one of the significant contributors of mercury as "Poughkeepsie". It is unclear which sludge originator(s) Kleinfelder was reviewing. We have asked and never received clarification on this question. To be clear, there are two distinctly different sludge originators that include reference to Poughkeepsie. These are the Town of Poughkeepsie and the City of Poughkeepsie. The former disposes of dewatered sludge at Naugatuck, in the approximate amount of 500 dry tons per year. The latter generates approximately 1,300 dry tons per year. The estimated quantities in the report for the source labeled "Poughkeepsie" indicates that the generated volume is 2,578 dry tons per year. Clarify quantities, originators and delineations thereof. Provide all backup calculations in spreadsheet format.
2. Torrington's sludge production was stated as 3213 dt per year (8.8 dtpd). This is overstated and is more on the order of 1,150 dt per year. Please provide all calculations and methodologies in spreadsheet format. Westport is also overstated (~300 dtpy versus 1081 dtpy). Bristol is significantly understated as 1,328 dtpy versus our estimated 1,897 dtpy, which may replace Poughkeepsie or Torrington as a deferred sludge.
3. The limited mercury data and low concentrations measured in the sludge (as compared to the laboratory detection limit) as well as the stack test concentrations should be reviewed in terms of repeatability. The laboratories' repeatability and accuracy should be considered (perhaps by utilizing similar sludge mercury testing from the lab's other customers) in order to determine a factor of safety for sludge reduction that ensures that compliance will be met. Further to this, the Technical Memorandum utilizes data from three stack tests and does not account for statistical deviations of the stack test measurements except to only use the average required reduction in emissions and worst case reduction of 54% and 62%, respectively. As it relates to actual mercury content variability in the sludge (not all sources are received and/or processed at the facility on a daily basis), a factor of safety should be incorporated due to the sludge not being uniformly homogenous from day to day. The annual stack test represents three - two hour runs which is only 0.07% (0.0006) of the calendar year. The incinerator uptime is normally greater than 90%. Repeatability must be considered when contemplating the necessary reduction to ensure a high degree of likelihood that compliance with the MACT standard would be achieved.
4. If the throughput was reduced, it is likely that continuous consumption of auxiliary fuel would be required to meet various limits at an extensive cost. Those limits would be CO, VOC, etc.
5. No evaluation has been done to determine whether the system is sized to operate at 38% - 46% of its permitted capacity, let alone at a significantly lower rate that would be required with a

- proper factor of safety to ensure likely compliance. The incinerator burners were not sized or designed at the contemplated capacities and may not be sufficient to achieve necessary exhaust gas temperatures at such a reduced capacity.
6. Any reduction in air flow in order to reduce the auxiliary fuel required to operate the incinerator is limited to the air flow required for fluidizing the sand. The airflow could be reduced from approximately 50,000 lbs/hr to 44,000 lbs/hr, assuming that the sludge will be adequately mixed. It is not clear how much fuel use would be required and if such fuel use would reduce the O<sub>2</sub> enough to offset the correction factor for our emissions rate, which cannot be accomplished if by air dilution only (e.g. maintain the same air flow and reduce the mercury input), since the correction to 7% oxygen would offset the effects of dilution.
  7. If we operate at higher air flow rates in proportion to sludge feed, the reduction in sludge BTU would have to be offset in order to meet the following permit conditions:
    - a. 1 hour block average for exhaust gas temperature at a range between 1400 F – 1625 F.
    - b. 1 hour block average for fluid bed combustion temperature between 1300F – 1550 F
  8. The same considerations would be required for lead.
  9. SO<sub>x</sub> would have to be evaluated in terms of whether additional chemical would be required as well as other acid gases. A target pH has not been established and / or a control system would have to be established.
  10. Turndown limitations of the incinerator sludge feed pumps require verification that the reduced capacity could be met. PLC re-programming would be required and we have never operated the incinerator at this low of a capacity.
  11. Please provide an update of the draft compliance monitoring and control plans. Veolia will need to confirm that proposed operating conditions are realistic and practical.
  12. Please verify who intends to schedule the stack test and what is the likely proposed date.
  13. Veolia has never received instructions for additional sludge sources, other than the Mayor's February 11<sup>th</sup> letter to EPA indicating that it would not start until April, 2016 and only on a quarterly basis.
  14. Has Kleinfelder considered proposing to EPA any alternative control plan proposal or alternate site specific monitoring plans. If so, please identify those plans. To be clear, the pre-approved plan in EPA's final rule requires either floor or ceiling limits based on the lowest conditions in the stack test. This means, that for example, our state permit combustion temperature operating range would only be acceptable as an approved alternative plan. Veolia is aware that thus far, it does not appear that EPA has accepted such an approach. This causes severe limitations in the ability to avoid chronic deviations depending on how the incinerator is operated during the stack test.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
MAR 16 2016**

The Honorable N. Warren Hess  
229 Church Street  
Borough of Naugatuck, CT 06770

Re: Naugatuck's Sewage Sludge Incinerator

Dear Mayor Hess:

I write concerning the upcoming sewage sludge incinerator regulations under the Clean Air Act that will affect the operation of the Borough of Naugatuck's sewage sludge incinerator located at 500 Cherry Street, Naugatuck. As you know, Naugatuck's sewage sludge incinerator ("SSI") will be subject to the *Federal Plan Requirements for Sewage Sludge Incineration Units Constructed on or Before October 14, 2010*. EPA expects these requirements to be promulgated shortly at 40 CFR Part 62, Subpart LLL.<sup>1</sup>

You have advised EPA Region 1 that the Borough will not be able to demonstrate compliance with Subpart LLL by March 21, 2016. By a letter dated February 11, 2016, you submitted a proposed schedule of measures intended to bring operations at the SSI into compliance with these requirements, and suggested that Naugatuck is interested in entering into an administrative settlement agreement with EPA.

As an initial matter, be advised that Section 62.15895 of Subpart LLL provides that if you fail to submit a final control plan and achieve compliance by the compliance date, you must submit a notification to EPA within 10 business days after the compliance date advising EPA that you did

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<sup>1</sup> Please note that 40 CFR Part 60, Subpart Mmmm establishes *Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units*. Subpart Mmmm, finalized on March 21, 2011, requires states with SSIs that commenced construction on or before October 14, 2010 to submit plans to EPA for approval to implement the emission guidelines, with a compliance date no later than March 21, 2016. However, SSIs located in states such as Connecticut that did not develop plans will be subject to the federal plan requirements of Subpart LLL, until such time as the state develops a plan that is approved by EPA. Moreover, the Clean Air Act at 42 U.S.C. § 7429(f)(2) states that performance standards for existing SSIs shall be in effect no later than five years after the date the emission guidelines were promulgated, that is by March 21, 2016.

not achieve compliance. In addition, you must submit monthly reports until a final control plan is submitted and final compliance is met. Section 62.15895 also provides that an SSI that operates out of compliance after the final compliance date would be in violation of the federal plan, and subject to enforcement.

EPA Region 1 expects Naugatuck to use its best efforts to meet each requirement of Subpart LLL as expeditiously as practicable, and to minimize air emissions from the SSI through the use of good engineering practices during any period of noncompliance. In furtherance of those efforts EPA Region 1 is willing to work with Naugatuck to enter into an appropriate enforcement instrument containing an enforceable compliance schedule. The Region expects that such an enforcement agreement would provide for payment of a penalty and performance of appropriate measures to mitigate the effects of any excess emissions. The negotiation of such an agreement would proceed on condition of full cooperation and diligence.

Nothing in this letter or in an enforcement agreement would relieve Naugatuck of its obligations to comply with applicable federal, state, and local laws. EPA reserves the right to use any of its authorities under the Clean Air Act to address noncompliance with Subpart LLL or with any other provision of federal law. EPA also reserves the right to take actions to address any conditions that present an imminent and substantial risk to public health, welfare, or the environment.

Please call me or Senior Enforcement Counsel Thomas T. Olivier to discuss the next steps towards the Borough's compliance with Subpart LLL, and toward the negotiation of an enforcement agreement.

Sincerely,



Steve Rapp, Chief  
Air Technical Unit

By electronic cc: Bob Girard, CT DEEP  
Dan Gorka, Veolia  
Neil Kulikauskas, Kleinfeld  
Jim Binder, J Binder Consulting



Veolia North America  
53 State Street, 14<sup>th</sup> Floor  
Boston, MA 02109

Tel. : (508) 436 - 7724  
Fax : (508) 894 - 0054  
www.veolianorthamerica.com

March 24, 2016

BY OVERNIGHT COURIER

Borough of Naugatuck  
Town Hall  
29 Church Street  
Naugatuck, CT 06770  
Attention: Mayor N. Warren Hess, Esq.

Re: Incineration Facilities Lease Agreement dated October 25, 2001 ("Agreement")

Dear Mayor Hess:

Pursuant to Section 14.3(2) of the above-referenced Agreement, Lessee hereby provides notice to Lessor that it is in default of the Agreement and such default, if left uncured, shall afford Lessee the right to terminate the Agreement for cause. The specific default is as follows:

Default: Lessor, as owner of the Incineration Facilities, has an obligation to comply with Applicable Law. (See, e.g., Agreement Section 6.3(9).) Lessor's failure to meet (along with its failure to take timely actions necessary to meet) the March 21, 2016 deadline for compliance with United States Environmental Protection Agency's sewage sludge incineration (SSI) regulations, including what is commonly referred to as MACT (Maximum Achievable Control Technology standards), constitutes a breach of a material obligation.

The Borough's letter dated March 21, 2016 essentially ignores the most salient fact: the Incinerator has fallen out of compliance with the law. Your letter glosses over the significance of the Incinerator's inability to meet MACT requirements, and offers little to no specifics, nor practical solutions, for addressing emissions requirements for mercury, lead, and SOx. Veolia simply cannot, and will not, overlook these important legal requirements.

Furthermore, the Borough still has not responded to the questions raised in Veolia's March 10, 2016 letter. As such, the Borough has given Veolia little choice but to initiate steps to terminate the customer sludge contracts. We would prefer to take these steps, if necessary, with some manner of cooperation with the Borough, and a mutual effort to minimize adverse effects. For that purpose, and for purposes of discussing the Borough's plan to cure its default, we would like to meet as soon as possible.

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel J. Gorka", written over a horizontal line.

Daniel J. Gorka



NAUGATUCK PUBLIC WORKS DEPARTMENT

James R. Stewart P.E. & L.S. , Director of Public Works  
246 Rubber Avenue, Naugatuck Ct. 06770

March 30, 2016

Mr. Steve Rapp, Chief  
Air Technical Unit  
USEPA  
Region I  
5 Post office Square, Suite 100  
Boston Massachusetts 02109-3912

**SUBJECT: Naugatuck, CT- SSI Notification of Non- Compliance**

Dear Mr. Rapp:

The Borough of Naugatuck continues to advance our plan to bring the existing SSI into compliance with Subpart LLL. To date, we have prepared and submitted a Draft Site Specific Monitoring Plan for your review and approval. At this time, however, we have not achieved full compliance, but are in the process of completing an enforcement agreement with EPA. Therefore, in accordance with the requirements of Section 62.15895 of Subpart LLL, please accept this as official notification of non-compliance.

Also, as noted in your letter dated March 16, 2016, the Borough will submit monthly reports to EPA until such time as the final control plan is submitted and compliance is met.

The Borough appreciates your ongoing assistance in this matter. If you require any additional information or would like to discuss further, please do not hesitate to contact us directly.

Sincerely,

James R. Stewart, P.E., L.S  
Director  
Department of Public Works  
Borough of Naugatuck

cc: By electronic cc: Bob Girard CTDEEP  
Marc Morin, Kleinfelder  
Neil Kulikauskas, Kleinfelder  
Mayor Hess  
Daniel Gorka, Veolia



**BOROUGH OF NAUGATUCK**  
**OFFICE OF MAYOR N. WARREN "PETE" HESS**

April 1, 2016

Daniel J. Gorka  
Veolia Environnement  
Veolia North America  
53 State Street, 14<sup>th</sup> Floor  
Boston, MA 02109

229 Church Street  
Naugatuck, CT 06770  
TEL (203) 720-7009  
FAX (203) 720-7099  
[www.naugatuck-ct.gov](http://www.naugatuck-ct.gov)  
[nwhess@naugatuck-ct.gov](mailto:nwhess@naugatuck-ct.gov)

**Re: Incineration Facilities Lease Agreement Dated October 25, 2001**

Dear Mr. Gorka:

I write in response to your letter of March 24, 2016.

Your letter purports to provide notice pursuant to Section 14.3(A)(2) of the above-referenced Incineration Facilities Lease Agreement ("Lease Agreement") that the Borough is in default of its obligation to comply with Applicable Law. Your position is not supported under the Lease Agreement nor is it supported by the facts.

As you know, the Borough, along with Veolia, have been in constant contact with the Environmental Protection Agency ("EPA") with respect to the MACT compliance requirements. Indeed, I point you to your own letter of February 2, 2016, where you encourage the Borough to pursue a one year extension of the compliance deadline which, "if granted, could then provide both parties additional time to discuss the requirements and consequences of pursuing it for a further period of time that would be governed by a Consent Order." That letter was followed by your letter of March 4, 2016, where you threatened to terminate the Customer Sludge Contracts or otherwise assign them to the Borough because the EPA had not provided "direction or authorization to continue to operate the incinerator after the deadline." On March 16, 2016, as a result of extensive discussions with the EPA, the Borough did secure a letter from the EPA acknowledging that the MACT compliance work at the site could proceed, with the EPA acknowledging that the process could take over a year. That letter acknowledged that Naugatuck would use its best efforts to meet the requirements of the statute as expeditiously as practicable, and that the EPA was "willing to work with Naugatuck to enter into an appropriate enforcement instrument containing an enforceable compliance schedule." As you know, Steve Rapp, chief of the Air Technical Unit for the EPA, has been very supportive of the Borough's interest in addressing MACT compliance at the site in a non-controversial manner.

The Borough now has several options available to it. It could, for example, enter into a one year administrative consent decree, the initiation of which would take several months to develop, according to the EPA. This would give the Borough, in effect, nearly sixteen months to complete its short term compliance plan. As you also know, the Borough has already begun

work towards achieving compliance with the MACT standards through the use of its compliance plan. To that end, on February 11, 2016, as a follow up to the January 20, 2016 meeting with EPA, the Borough provided EPA with a proposed schedule of measures to bring the operations of the sewage sludge incinerator into compliance with the applicable MACT standards. As part of meeting that schedule, on March 17, 2016, the Borough submitted a Site Specific Monitoring Plan to EPA, and updated that plan on March 24, 2016, utilizing revised stack test data corrected by Veolia. We await EPA comment. Currently, the Borough is in the process of developing a control plan to define the air pollution control equipment to be used to reduce mercury emissions. The Borough will submit that plan to EPA upon completion. As you also recall from the February 11, 2016 letter, the Borough has proposed to EPA that an analysis of sludge samples by Veolia be conducted to identify high mercury content customers and to conduct an outreach program with those customers to have them work within their regulatory framework to reduce mercury from users that discharge to their sewer systems. EPA has asked for details of this program to be defined, presumably as part of the control plan. This means of control - to reduce mercury at the source without diverting or eliminating sludge -- was presented to support the pollution control equipment to be installed by the Borough. EPA was supportive of this approach.

Alternatively, the Borough could, instead, continue to work with the EPA to develop a negotiated deadline to meet MACT standards that extends beyond one year. The Borough recognizes that there may be penalties associated with this approach and is prepared to pay them. This approach is certainly contemplated under Section 62.15895 of 40 CFR Part 62, Subpart LLL, wherein the operator of a sewage sludge incinerator may inform EPA of its inability to meet applicable MACT standards (which the Borough has already done on March 30, 2016) and submit monthly reports to EPA regarding its compliance efforts as contemplated under Subpart LLL. In light of the EPA's March 16, 2016 letter to the Borough (as well as your own correspondence of February 2, 2016), the Borough believes that the best course of action is to rely upon the EPA's March 16, 2016 letter as it negotiates a formal administrative consent order with EPA.

In short, in full cooperation with the EPA, the Borough is complying with Applicable Law, because the Applicable Law permits the Borough to undertake a process by which it would come into compliance with the MACT requirements.

I urge you to read the definition of Applicable Law in the Lease Agreement as it encompasses any "policy, implementation schedule or other order of any Governmental Body," or, "established interpretation of law or regulation utilized by an appropriate regulatory Governmental Body" or "Governmental Approval" (which in turn encompasses 'any' authorizations, consents entitlements and approvals issued by a Governmental Body), or in any "settlement agreement or other similar agreement between the [Borough] and the EPA." There can simply be no dispute. The letter from EPA acts as an Applicable Law within the meaning of the Lease Agreement, and the Borough is in compliance with the Applicable Law.

I also point you to Section 14.3(B) of the Lease Agreement. Even if an Applicable Law violation had occurred, and it has not, no Event of Default has occurred because the Borough has initiated steps to cure said alleged default. As noted above, the EPA fully supports the Borough's efforts to address the new MACT standard and is cooperating with the Borough in its efforts to do so. In addition, DEEP is working with the Borough to finalize a consent order which requires compliance with MACT standards.

Furthermore, the Borough additionally objects to the suggestion that there has been a default for failure to comply with Applicable Law because, if anything, what has occurred is an occurrence of an "Uncontrollable Circumstance," based on a "Change in Law" resulting from the adoption of a standard that restricts the amount and type of sludge that may be incinerated (see e.g. 15.4(B)), which Uncontrollable Circumstance the Borough has taken steps to cure as described above. Section 14.3 does not give Veolia the right to terminate the Lease Agreement as a result of a Change in Law. Dan, there is no basis for you to terminate the lease and any actions you take in furtherance thereof will be considered a breach and subject you to damages and specific performance under Sections 14.1 and 14.2. Further, as the Borough is meeting the requirements of Applicable Law, Veolia is required to operate the incinerator, and Rent payments are not subject to reduction.

The Borough looks forward to meeting with you Friday in an effort to resolve our differences.

Very truly yours,

A handwritten signature in cursive script, appearing to read "N. Warren", enclosed within a large, loopy circular scribble.

N. Warren "Pete" Hess  
Mayor



April 4, 2016

The Honorable N. Warren Hess, III  
Borough of Naugatuck  
180 Church Street  
Naugatuck, CT 06770

**SUBJECT: Response to 3/10/2016 Veolia Questions to Borough and Kleinfelder**

Dear Mayor Hess:

The following summary provides written responses (**bold**) to Veolia's questions (*italics*) presented to the Borough and Kleinfelder, as attached to their letter dated March 10, 2016.

1. *The mercury / sludge table identified one of the significant contributors of mercury as "Poughkeepsie". It is unclear which sludge originator(s) Kleinfelder was reviewing. We have asked and never received clarification on this question. To be clear, there are two distinctly different sludge originators that include reference to Poughkeepsie. These are the Town of Poughkeepsie and the City of Poughkeepsie. The former disposes of dewatered sludge at Naugatuck, in the approximate amount of 500 dry tons per year. The latter generates approximately 1,300 dry tons per year. The estimated quantities in the report for the source labeled "Poughkeepsie" indicates that the generated volume is 2,578 dry tons per year. Clarify quantities, originators and delineations thereof. Provide all backup calculations in spreadsheet format.*

**We are aware that clarification is needed for the "Poughkeepsie" sludge streams and have previously noted that the initial data presented to EPA was very limited and included for discussion purposes. As discussed, additional data collection is needed.**

2. *Torrington's sludge production was stated as 3213 dt per year (8.8 dtpd). This is overstated and is more on the order of 1,150 dt per year. Please provide all calculations and methodologies in spreadsheet format. Westport is also overstated (~300 dtpy versus 1081 dtpy). Bristol is significantly understated as 1,328 dtpy versus our estimated 1,897 dtpy, which may replace Poughkeepsie or Torrington as a deferred sludge.*

**As previously noted, the initial sludge data was very limited. As additional data is collected, we will work with the Borough and Veolia to verify the sludge production and develop a more representative summary for evaluation.**

3. *The limited mercury data and low concentrations measured in the sludge (as compared to the laboratory detection limit) as well as the stack test concentrations should be reviewed in terms of repeatability. The laboratories' repeatability and accuracy should be considered (perhaps by utilizing similar sludge mercury testing from the lab's other customers) in order to determine a factor of safety for sludge reduction that ensures that*

*compliance will be met. Further to this, the Technical Memorandum utilizes data from three stack tests and does not account for statistical deviations of the stack test measurements except to only use the average required reduction in emissions and worst case reduction of 54% and 62%, respectively. As it relates to actual mercury content variability in the sludge (not all sources are received and/or processed at the facility on a daily basis), a factor of safety should be incorporated due to the sludge not being uniformly homogenous from day to day. The annual stack test represents three - two hour runs which is only 0.07% (0.0006) of the calendar year. The incinerator uptime is normally greater than 90%. Repeatability must be considered when contemplating the necessary reduction to ensure a high degree of likelihood that compliance with the MACT standard would be achieved.*

**We agree that current analysis of Mercury (Hg) reduction requirements has been based on limited data points, with the stack tests being “snapshots” of the system operation. However, this methodology is commonly used for evaluating incinerator system performance, particularly for pollutants such as Hg, since a means of continuously monitoring Hg emissions is not available at the Naugatuck facility. Implementing such a system would be expensive, require additional time in an already compressed compliance timeline, and present potential permitting issues.**

**The reduction of sludge throughput, by means of eliminating sludge import from sources with high mercury loading, has been discussed as a possible means of reducing Hg emissions in our memo dated 1/8/2016. While a straight-line relationship between sludge input and Hg emission reduction is not a likely real-world scenario, it was assumed to be an initial point of discussion requiring further monitoring and analysis.**

- 4. If the throughput was reduced, it is likely that continuous consumption of auxiliary fuel would be required to meet various limits at an extensive cost. Those limits would be CO, VOC, etc.*

**We don't have sufficient background to validate or refute this conclusion. Again, relating to Item #3, the reduction of sludge feed from sources with high Hg loading requires further monitoring and analysis.**

- 5. No evaluation has been done to determine whether the system is sized to operate at 38% - 46% of its permitted capacity, let alone at a significantly lower rate that would be required with a proper factor of safety to ensure likely compliance. The incinerator burners were not sized or designed at the contemplated capacities and may not be sufficient to achieve necessary exhaust gas temperatures at such a reduced capacity.*

**Agreed, an evaluation of system turndown capability and feasibility was not performed. Again, relating to Item #3, the reduction of sludge feed from sources with high Hg loading requires further monitoring and analysis.**

- 6. Any reduction in air flow in order to reduce the auxiliary fuel required to operate the incinerator is limited to the air flow required for fluidizing the sand. The airflow could be reduced from approximately 50,000 lbs/hr to 44,000 lbs/hr, assuming that the sludge will be adequately mixed. It is not clear how much fuel use would be required and if such fuel use would reduce the O2 enough to offset the correction factor for our emissions rate, which cannot be accomplished if by air dilution only (e.g. maintain the same air flow*

and reduce the mercury input), since the correction to 7% oxygen would offset the effects of dilution.

**Same comment as Items #4 and #5 applies.**

7. *If we operate at higher air flow rates in proportion to sludge feed, the reduction in sludge BTU would have to be offset in order to meet the following permit conditions:*
  - a. *1 hour block average for exhaust gas temperature at a range between 1400 F – 1625 F.*
  - b. *1 hour block average for fluid bed combustion temperature between 1300F – 1550 F*

**Same comment as Items #4 and #5 applies.**

8. *The same considerations would be required for lead.*

**Agreed, but lead (Pb) emission exceedances have been more random compared with Hg which has been trending upwards. It is our opinion that the proposed air pollution control improvements will also provide control for the occasional spikes in Pb emissions.**

9. *SOx would have to be evaluated in terms of whether additional chemical would be required as well as other acid gases. A target pH has not been established and / or a control system would have to be established.*

**Process parameters such as scrubber recycle rates and minimum pH targets can be discussed, but would be established during the initial engineering test as required by the rule regardless of sludge feed rate.**

10. *Turndown limitations of the incinerator sludge feed pumps require verification that the reduced capacity could be met. PLC re-programming would be required and we have never operated the incinerator at this low of a capacity.*

**Same comment as Items #4 and #5 applies.**

11. *Please provide an update of the draft compliance monitoring and control plans. Veolia will need to confirm that proposed operating conditions are realistic and practical.*

**The SSMP has been submitted to EPA for review and approval. A copy has been provided to Veolia for comment. Once comments are received and incorporated and EPA approves the SSMP, we will work with the Borough and Veolia on next steps.**

12. *Please verify who intends to schedule the stack test and what is the likely proposed date.*

**The Borough will proceed with a stack test to establish current, baseline performance for the existing operation if directed by the EPA. The Borough will decide whether this test will be coordinated and arranged for by Kleinfelder/TRC or Veolia.**

13. Veolia has never received instructions for additional sludge sources, other than the Mayor's February 11th letter to EPA indicating that it would not start until April, 2016 and only on a quarterly basis.

We will work with the Borough to prepare a sludge monitoring plan for Hg contributions. A proposed frequency of monitoring will be developed with a focus on creating data sets for each vendor suitable for evaluation.

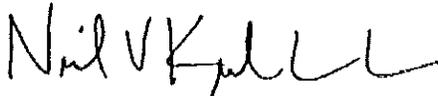
14. Has Kleinfelder considered proposing to EPA any alternative control plan proposal or alternate site specific monitoring plans. If so, please identify those plans. To be clear, the pre-approved plan in EPA's final rule requires either floor or ceiling limits based on the lowest conditions in the stack test. This means, that for example, our state permit combustion temperature operating range would only be acceptable as an approved alternative plan. Veolia is aware that thus far, it does not appear that EPA has accepted such an approach. This causes severe limitations in the ability to avoid chronic deviations depending on how the incinerator is operated during the stack test.

The SSMP does not include any specific alternative monitoring parameters, but these can be addressed if necessary based on future input from Veolia. In addition, the Hg-control option selected by the Borough is expected to require a petition for approval. Other petitions for alternative technologies, controls, or monitoring systems may be required in later iterations of the SSMP but are not included at this time due to lack of definition.

We trust that the responses have adequately addressed Veolia's questions. Please let me know if any additional information is requested.

Sincerely,

KLEINFELDER



Neil Kulikauskas, P.E.  
Principal Engineer



## Naugatuck taking alternative approach to mandate

March 25, 2016 - Naugatuck, News, Top Stories - Tagged: Naugatuck, wastewater treatment plant - no comments

by Luke Marshall, Staff Writer

NAUGATUCK — The borough is moving forward with plans to meet a federal mandate to make upgrades at the wastewater treatment plant.

New environmental guidelines mandated by the Environmental Protection Agency state that municipalities with wastewater treatment facilities must make millions of dollars in upgrades to mitigate pollutants. The upgrades are designed to reduce mercury emissions from burning sludge in incinerators and the amount of phosphorous that is in discharged water in order to meet the guidelines.

In total, the borough is facing an estimated \$80 million worth of upgrades to the treatment plant, which is run by Veolia Water North America but owned by the borough. Of that \$80 million total, about \$13 million of upgrades to improve air quality was supposed to be completed by the end of March.

In January, borough officials met with the EPA to present alternative plans for the upgrades at the wastewater treatment plant, which is located at 500 Cherry St.

"We told [the EPA] what we are going to do, we are in the process of doing it, and we are still in the process of working out an overall settlement agreement," Mayor N. Warren "Pete" Hess said earlier this month. "We can't complete the settlement agreement until after certain time tables are met. I would say we are hopeful we will reach an agreement with them in early June to resolve the short-term issues, which will take us through the next six or seven years, which is the remaining time on our contract with Veolia," Hess said.

The short-term plan includes testing sludge for mercury on a quarterly basis beginning in April, the completion and submission to the EPA of a site specific monitoring plan, and upgrades to the air pollution control equipment.

Hess said the borough will begin work on the air pollution control equipment once the parameters are identified and finalized by EPA. He said the borough is also exploring options for upgrades to the incinerator, which will cost less than the \$13 million that was originally thought to meet the federal mandate.

"We are reviewing technology with EPA and we are proceeding with it," Hess said. "It will be a plan that will get us into compliance, work, be satisfactory to EPA, and will be a good plan. Right now we are giving them our view of how we can solve the problems in the short term and they are reviewing our technology and making a decision as to whether that is appropriate."

Hess said he expects the incinerator upgrades to cost \$3 million.

Regardless of how the borough moves forward with the upgrades, it doesn't have a choice but to move forward, Hess said.

"We will be under an order from the federal government, state government, or both to implement this plan, which means it will not go to a referendum. It will be bonded and paid for without a referendum. This is a federal mandate and it's not up to us whether or not we want to comply. We have to comply and we will comply," Hess said.

In addition to the short-term plan, the borough also presented the EPA with a long-term proposal that would cover the treatment plant for the next three decades.

"This is where you get into all the green things, possibly ways to eliminate the incinerator, which would lead to longer term better air quality, ways to prevent wastewater going into the river, which would improve phosphorous," Hess said.

Borough officials are meeting with representatives from various companies Tuesday at the treatment plant to

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tour the facility and discuss long-term concepts.

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"We will make a presentation, we will have a question and answer period, and we will give them a tour of the plant. [The long-term plan is] basically a document where we are asking them to present us with their concepts of what they can do to resolve our long-term issues," Hess said.

Earlier this year, state officials began talking about regionalizing the care and maintenance of wastewater treatment plants. Hess said this would not have an impact on the borough's immediate plans.

"It does not change our short-term plan because any regionalization would take a long period of time to implement," Hess said. "We are moving forward with our short-term plan as we speak. I instructed our consultants to go full speed ahead."

Hess said the borough's next step is to complete the details and exact specifications of the short-term compliance plan, which would include the exact specifications of the equipment the borough will purchase and install to reduce emissions.

"Then we have to get EPA to agree. Then we have to order it and install it," Hess said. "We expect all of those things will be done in an approximate 18-month period."

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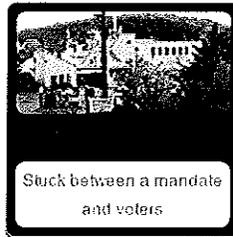
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Monday-Friday, 9 a.m.-5 p.m.

Connecticut Water Company  
93 West Main Street  
Clinton, CT 06413  
Customer Service: 800.286.5700



March 22, 2016

Mr. John Batorski, Plant Manager  
Veolia Water North America – Northeast, LLC  
500 Cherry Street  
Naugatuck, CT 06770

**RE: W.C. Stewart Water Treatment Plant  
Water Treatment Wastewater General Permit No. GWT000120  
Discharge Monitoring Data for February 2016**

Dear Mr. Batorski:

Enclosed is the W.C. Stewart Water Treatment Plant discharge monitoring results for the month of February 2016.

If you have any questions, please contact me at (860) 664-6142.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. D'Onofrio".

David J. D'Onofrio  
Water Compliance & Laboratory Services  
Supervisor

DJD/las  
Enc.

CC: P. Andrews  
D. Kean

W.C.STEWART WATER TREATMENT PLANT WASTEWATER DISCHARGES TO POTW

MONTH: Feb  
YEAR: 2016

UTILITY: THE CONNECTICUT WATER COMPANY  
UTILITY TOWN: NAUGATUCK  
ADDRESS: 119 HORTON HILL ROAD, NAUGATUCK, CT 06770

WATER TREATMENT WASTEWATER GENERAL PERMIT: GWT000120, SITE NO.: 088-057

UTILITY REPRESENTATIVE RESPONSIBLE FOR REPORT: David J. D'Onofrio  
TELEPHONE NUMBER OF REPRESENTATIVE: (860) 664-6142

SOURCE	Discharge Serial No.	DATE OF COLLECTION	DATE OF REPORT	Total Daily Flow Gallons	pH	Temperature Degrees 'F	Total				Settleable Solids mL/L			
							Chlorine Residual	Copper	Iron	Manganese Zinc		Suspended Solids		
#2022 Stewart Clarifier Blowdown	001	2/23/16	2/26/16	6,500	6.6	42	189	0.00	0.168	19.2	1.92	0.386	1,400	0.5
#20221 Stewart Clarifier Cleanout	002													
#20221 Stewart Clarifier Cleanout	002													
#2023 Stewart Analyzer Wastewater	003													

Analytical Results are expressed as mg/L except pH and otherwise noted.



Sent Certified R.R.R. mail #7014 1200 0002 2236 9975 on March 28, 2016

Mr. Craig Motasky  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

March 28, 2016

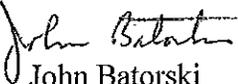
Re: Operator Updates/In Charge Time

Dear Mr. Motasky:

Attached is an updated certified Operator list for the Naugatuck WPCF. In addition, Rafal Gaciarz will apply to take the Grade IV Certification exam this July. He was appointed Shift Supervisor on March 3, 2014 (copy of Verification Form dated 3/3/14 attached for reference) which provides the two years of in charge time.

Please contact me if you have any questions.

Sincerely,  
Veolia Water North America – Northeast, LLC

  
John Batorski  
Plant Manager

Enclosure: Chief, Shift and Process Control Operator Verification Form dated 3/3/14  
Operator List, 3/28/16

Effective 3-28-16

Naugatuck WWTP Staff Certifications

Employee	Title	Start Date	Certificate Type
1 Azzarito, Michael	Operator 1	8/27/2012	Class 1 Wastewater (Jan 2014)
2 Carpentier, John M	Maint Lead, licensed electrician	2/9/2009	Collections System Grade 3
3 Deller, Thomas A *	Lead Operator	8/29/1988	Class 3 Wastewater Cert #1430
4 Fitzgerald, Paul	Operator in Training	6/24/2015	OIT designation Jan 26, 2015
5 Flannery, Bryan	Operator 1	7/23/2012	Class 1 Wastewater Cert #2399
6 Forish, Michael	Coll Operator 2	2/14/2011	Coll Sys Grade 2, passed Grade 1 wastewater exam (Jan 2016)
7 Gaciarz, Rafal *	Operator 3	7/5/2011	Class 3 Wastewater Cert #2361
8 Grosso, James	Maint. Mech III, licensed electrician	4/28/2014	will take next collections test
9 Howard, Brian	Coll Operator 1	9/11/2013	Collections System Grade 1
10 Little, Patrick	Operator 1	2/6/2012	Class 1 Wastewater Cert #2403
11 Martins, Brian	Maint. Mech III, licensed plumber	1/26/2015	will take next collections test
12 Nunes, Jose	Operator 2	6/6/1988	Class 2 Wastewater Cert #1391
13 Rebimbas, Francisco J	Operator 2	2/3/2003	Class 2 Wastewater Cert #2219
14 Ricardo, Rivera	Operator in Training	2/23/2016	OIT designation Aug 2013
16 Tomarelli, Michael	Maint. Mech III, licensed electrician	10/28/2013	will take next collections test
17 Yontef, Andre	Operator 1	9/9/2013	Class 1 Wastewater (Jan 2014)
18 Young, Harry D	Operator 2	3/17/1989	Class 2 Wastewater Cert #1297
19 Verlezza, Natalie <sup>1</sup>	Plant Engineer (BS degree)	5/18/2015	passed Grade 1 wastewater exam (Jan 2016)

Jackson, Shelby resigned, in Jan 2016 believe he is at Wallingford, CT facility (Water Treatment)

Burke, Eugene transferred to the Redding, CT facility

Bernardini, Matthew will transfer to Redding facility Feb 8, 2016

\* Process Control Operators

**Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
Chief, Shift and Process Control Operator Verification Form**

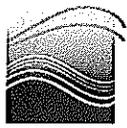
Please complete one copy of this form for each wastewater treatment facility in your municipality

<b>FACILITY INFORMATION</b>	Facility Name <u>Naugatuck WWTP</u>	1st Shift	2nd Shift	3rd Shift	Other
	Municipality				
	Supervisory Personnel at Facility	4			
	Operations Personnel at Facility	6	3	3	2
	Maintenance Personnel at Facility	8			
	Administrative and Clerical Personnel at Facility	2			
	Total Personnel on Shift	20	3	3	2
<b>CHIEF OPERATOR</b>	Name <u>John Butorski, Plant Mgr.</u>	Certification II III IIIIG <b>IV</b> IVG		Certification # <u>1072</u>	
	Date Appointed Chief Operator: <u>7-21-08</u>				
	Notes or Comments <u>Plant Manager</u>				
<b>SHIFT OPERATOR</b>	Name <u>Chris Makuch, Asst. Mgr.</u>	Certification II III IIIIG <b>IV</b> IVG		Certification # <u>1982</u>	
	Date Appointed Shift Operator: <u>12-21-09</u> What Shift? <u>First</u>				
	Does this operator have the authority to make process control changes? <u>yes</u>				
	How many people does this operator supervise? <u>15</u>				
	What are the operator's responsibilities on this shift? <u>Plant operations &amp; process control</u>				
<b>SHIFT OPERATOR</b>	Name <u>Rafal Gaciarz</u>	Certification II <b>III</b> IIIIG IV IVG		Certification # <u>2361</u>	
	Date Appointed Shift Operator: <u>8-29-13</u> What Shift? <u>First</u>				
	Does this operator have the authority to make process control changes? <u>yes</u>				
	How many people does this operator supervise? <u>4</u>				
	What are the operator's responsibilities on this shift? <u>Process Control, general supervision lab as needed</u>				
<b>SHIFT OPERATOR</b>	Name	Certification		Certification #	
	Date Appointed Shift Operator:	What Shift?			
	Does this operator have the authority to make process control changes?				
	How many people does this operator supervise?				
	What are the operator's responsibilities on this shift?				
<b>PROCESS CONTROL OPERATOR</b>	Name <u>Thomas Deller</u>	Certification II <b>III</b> IIIIG IV IVG		Certification # <u>1430</u>	
	Date Appointed Process Control Operator: <u>7/15/13</u> What Shift? <u>First</u>				
	Does this operator have the authority to make process control changes? <u>yes</u>				
	How many people does this operator supervise? <u>11</u>				
	What are the operator's responsibilities on this shift? <u>Process Control, lab, general supervision</u>				

I hereby certify that the information supplied above contains no willful misrepresentations or falsifications, and that the information is true and complete to the best of my knowledge and belief.

Signed John Butorski 3/3/14  
Chief Operator Date

Signed \_\_\_\_\_  
Chief Elected Municipal Official Date



Date: March 17, 2016

To: Chief Elected Official, Water Pollution Control Authority, Superintendent

From: George V. Hicks, P.E., Supervising Sanitary Engineer, Municipal Facilities

Re: Draft FY16 and FY17 Priority List for the Clean Water Fund  
Availability for review and comment; Notice of Public Hearing

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The public notice for the hearing on the draft FY16 and FY17 Priority List for the Clean Water Fund was published in the state's six largest newspapers on March 15, 2016.

A public hearing will be held on the draft priority list at DEEP Headquarters in Hartford on April 19, 2016 at 9:30 am in the 5th floor auditorium of 79 Elm Street, Hartford, Connecticut.

The draft FY16 and FY17 Priority List for the Clean Water Fund (CWF) program can be found at: <http://www.ct.gov/dep/cleanwaterfund>

The draft FY16 and FY17 Priority List proposes a two year funding strategy that will reach a significant number of necessary wastewater infrastructure projects whose implementation is considered significant to reduce serious negative impacts on water quality in our state. These projects include nitrogen removal projects in order to meet the 2014 Total Maximum Daily Load for the Long Island Sound; phosphorus removal projects in order to comply with effluent limits that are being incorporated into NPDES permit renewals; and combined sewer overflow improvement projects to meet Long Term Control Plan goals in our state's largest cities.

The draft FY16 and FY17 Priority List includes the typical planning, design and small community reserves that have been included in previous Priority Lists. The draft FY16 and FY17 Priority List also has funding reserves devoted exclusively toward:

- Incorporating green infrastructure principles into wastewater infrastructure that will promote stormwater infiltration in combined sewer areas;
- Fund cost-effective renewable energy projects at treatment plants;
- Rehabilitating pump stations and other parts of collection systems; and
- Extending sanitary sewers in order to solve existing community pollution problems.

Please refer to Sections 3b and 3c for details on these funding set-asides.

Interested parties are invited to review and comment on the draft Priority List. Please submit written comments to Rowland Denny, Bureau of Water Protection and Land Reuse, Connecticut Department of Energy & Environmental Protection, 79 Elm Street, Hartford, Connecticut 06106-5127 on or before April 19, 2016.



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
WATER BUREAU



**LOSS OF EQUIPMENT/TANKAGE FORM**

City or Town: Naugatuck

Date: 03/09/2016

Loss of equipment/tankage: Aeration train #2

How long will it be before permanent repairs are complete? 03/12/2016

How many and what kind of back up units or storage do you have? \_\_\_\_\_

Aeration train #2 in full service

Discovered date: 1/1 regular diffuser maintenance

Will this affect quality of Effluent:  Yes  No  Don't Know

Contact DEP within two hours by phone during normal business hours and file this report within five days.

**DATE/ TIME**

**REPORT LOG**

3/14/16 8:23 am CT DEP - Iliana Ayala (860) 424-3758 If Iliana Ayala is not available, you **must** call Municipal Facilities Section during normal business hours at:

\_\_\_\_\_ CT DEP (860) 424-3704 **DO NOT LEAVE VOICE MAIL MESSAGES**  
\_\_\_\_\_ Name of person contacted

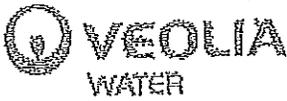
\_\_\_\_\_ Fax Report to CT DEP, Iliana Ayala (860) 424-4067

Report Submitted by: Christopher Madenich Title: Assistant Plant Manager

Signature: [Signature] Phone #: 203-713-1433 ext 2018

Submit Completed Report to: State of Connecticut

Department of Environmental Protection  
Water Bureau – Attention: Iliana Ayala  
79 Elm Street  
Hartford, CT 06106-5127



VEOLIA WATER NORTH AMERICA  
500 Cherry Street  
Naugatuck, CT 06770

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

 Fax

TO *Eliana Ayala, CT DEEP*

FAX *(860) 424-4067*

FROM *Christopher Makuch, Naugatuck Wastewater  
treatment Facility*

DATE *03/09/2016*

PAGES: *2*  
Including this page

SUBJECT *LOSS of Tankage Form*

MESSAGE

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\* \* \* Communication Result Report ( Mar. 9. 2016 10:39AM ) \* \* \*

1} Veolia Water-NET LLC

Date/Time: Mar. 9. 2016 10:38AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
8633 Memory TX	18604244067	P. 2	OK	

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670 Clay Street  
Norwalk, CT 06878

Tel: 888-722-1133 / 203-882-1453  
Fax: 203-722-6839  
www.veoliamerica.com

Fax

TO *Illiana Ayala, CT DEEP*

FAX *(860) 424-4067*

FROM *Christopher Mahuch, Naugatuck wastewater treatment Facility*

DATE *03/09/2016*

PAGES: *2*  
including this page

SUBJECT *LOSS. of Tankage Form*

MESSAGE

THIS MESSAGE AND ANY FILES TRANSMITTED HEREIN ARE UNCLASSIFIED AND NOT FOR DISSEMINATION TO THE PUBLIC. IF YOU HAVE RECEIVED THIS FAX IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY RETURNING FAX TO THE ORIGINAL TRANSMITTER OR BY THE ABOVE NUMBERED FAX NUMBER.



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
WATER BUREAU



LOSS OF EQUIPMENT/TANKAGE FORM

City or Town: Mansfield Date: 03/15/2016

Loss of equipment/tankage: #2 Secondary Clarifier

How long will it be before permanent repairs are complete? 3/18/2016

How many and what kind of back up units or storage do you have? \_\_\_\_\_

2 secondary clarifiers + polishing tank in service.

Discovered date: 3/15/16 ← scheduled flight maintenance

Will this affect quality of Effluent:  Yes  No  Don't Know

Contact DEP within two hours by phone during normal business hours and file this report within five days.

DATE/ TIME

REPORT LOG

\_\_\_\_\_ CT DEP - Iliana Ayala (860) 424-3758 If Iliana Ayala is not available, you **must** call Municipal Facilities Section during normal business hours at:

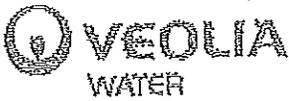
3-15-16/10<sup>45</sup> AM CT DEP (860) 424-3704 DO NOT LEAVE VOICE MAIL MESSAGES  
Katherine Oshy Name of person contacted

3-15-16/10<sup>55</sup> AM Fax Report to CT DEP, Iliana Ayala (860) 424-4067

Report Submitted by: Christopher Malachuk Title: Assistant Plant Manager

Signature: [Signature] Phone #: 203-723-1433 ext 2018

Submit Completed Report to: State of Connecticut  
Department of Environmental Protection  
Water Bureau -- Attention: Iliana Ayala  
79 Elm Street  
Hartford, CT 06106-5127



VEOLIA WATER NORTH AMERICA  
500 Cherry Street  
Naugatuck, CT 06770

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

 Fax

TO *Iliana Ayala , CT DEEP*

FAX *(860) 424-4067*

FROM *Christopher Maluch Naugatuck WPCF*

DATE *3/15/2014*

PAGES: *2*  
*Including this page*

SUBJECT *LOSS OF EQUIPMENT / TAKEAWAY FORM*

MESSAGE

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\* \* \* Communication Result Report ( Mar. 15. 2016 10:47AM ) \* \* \*

1) Veolia Water-NET LLC  
2)

Date/Time: Mar. 15. 2016 10:46AM

File No. Mode	Destination	Pg (s)	Result	Page Not Sent
8681 Memory TX	18604244067	P. 2	OK	

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VEOLIA WATER (NET) ALBERTA  
550 Chesley Street  
Nagsburg, OT 44770

Tel: 1-203-223-1433 / 1-888-655-1433  
Fax: 1-203-223-4504  
www.veolia-water.com

Fax

to Ithina Ayala , CT DEEP

FAX (310) 424-4067

FROM Christopher Mathews Nagsburg wife

DATE 3/15/2016

PAGES: 2  
Including the page

SUBJECT LOSS OF EQUIPMENT TAXABLE FORM

MESSAGE

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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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: Rugs

Exact Location of By-Pass: South Main St. Rt. 63 MH 10-136

Date and Time By-Pass was Discovered: 3 / 15 / 2016 9:00 AM/PM

Date and Time By-Pass was Stopped: 3 / 16 / 2016 2:30 AM/PM

How By-Pass was Discovered: Resident called Fire Department

Quantity/Volume of By-Pass: ~ 300 gallons

How Quantity/Volume was Determined: Estimated

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

Receiving Waters (If Applicable) Naugatuck River

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

Action taken to eliminate By-Pass: Jetting of sewer line to remove blockage

Steps Taken to prevent recurrence of By-Pass: camera line and inspect

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:

3-16/14:45 AM CT DEEP (860) 424-3704 [(860) 424-3338 (DEEP Emergency Dispatch) only for after hours] DO NOT LEAVE VOICE MAIL MESSAGES

# 206 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 1<sup>st</sup> through September 30<sup>th</sup>.

\_\_\_\_\_  
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

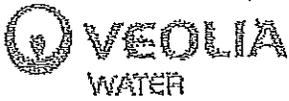
3/17/16/10:41 AM Fax to CT DEEP, Iliana Ayala (860) 424-4067

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

3/17/16/10:41 AM Fax to Local Health Department or Regional Health District 203-581-3259

Report Submitted by: Christopher Mahuch Title: Assistant Plant Manager  
Signature: [Signature] Date: 3/17/2016 Phone # 203-723-1433 ext 2018  
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



VEOLIA WATER NORTH AMERICA  
500 Cherry Street  
Naugatuck, CT 06770

Tel : 203-723-1433 / 888-682-1433  
Fax : 203-723-8539  
www.veollawatema.com

 Fax

TO *Naugatuck Valley Health Department*

FAX *203-881-3259*

FROM *Christopher Malach Naugatuck WWTP*

DATE *3/17/2016*

PAGES: *3*  
*Including this page*

SUBJECT *Raw Sewage bypass report*

MESSAGE

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\* \* \* Communication Result Report ( Mar. 17. 2016 9:56AM ) \* \* \*

1) Veolia Water-NET LLC  
2)

Date/Time: Mar. 17. 2016 9:55AM

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
8708	Memory TX	2038813259	P. 3	OK	

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VEOLIA WATER NORTH AMERICA  
 800 Olney Blvd  
 Norwalk, CT 06850  
 Tel: 203-222-1433 / 638-6251433  
 Fax: 203-222-6254  
 Email: veolia@veolia.com

**Fax**

TO *Naugtuck Valley Health Department*

FAX *203-881-7259*

FROM *Christopher Malach Naugtuck WWTP*

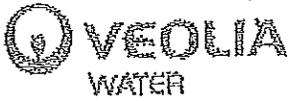
DATE *3/17/2016*

PAGES: *3*  
including this page

SUBJECT *Raw Sample bypass report*

MESSAGE

THIS TRANSMISSION CONTAINS CONFIDENTIAL INFORMATION BELONGING TO THE CITY OF NORWALK. IF YOU ARE NOT THE ADDRESSEE, YOU SHOULD NOT DISSEMINATE OR TAKE ANY ACTION ON THE INFORMATION CONTAINED HEREIN. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE IMMEDIATELY NOTIFY THE TELEPHONE COMPANY AND DELETE THIS MESSAGE FROM YOUR SYSTEM. IF YOU ARE THE ADDRESSEE, PLEASE CONTACT THE ADDRESSEE TO OBTAIN THE INFORMATION YOU REQUESTED.



VEOLIA WATER NORTH AMERICA  
600 Cherry Street  
Naugatuck, CT 06770

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

 Fax

TO *Iliana Raffa CT DEEP*

FAX *860-424-4067*

FROM *Christopher Malauch*

DATE *3/19/2016*

PAGES: *3*  
Including this page

SUBJECT *Bypass Report*

MESSAGE

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\* \* \* Communication Result Report ( Mar. 17. 2016 10:04AM ) \* \* \*

1) Veolia Water-NET LLC  
2)

Date/Time: Mar. 17. 2016 10:02AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
8711 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  
 603 Colony Street  
 Hingham, CT 01904  
 Tel: 203-728-1159 / ext. 600-1143  
 Fax: 203-728-6589  
 www.veoliawater.com

Fax

TO Eliane Raffu CT DEEP

FAX 860-424-4067

FROM Christy M. Mohr

DATE 3/17/2016

PAGES: 3  
including this page

SUBJECT Bypass Report

MESSAGE

THIS MESSAGE MAY CONTAIN CONFIDENTIAL INFORMATION. IF YOU ARE NOT THE ADDRESSEE, PLEASE DO NOT DISCLOSE THIS INFORMATION TO ANY OTHER PERSON. IF YOU HAVE RECEIVED THIS FAX IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AT 203-728-6589. WE WILL DELETE THIS MESSAGE FROM OUR SYSTEMS IMMEDIATELY UPON RECEIPT OF YOUR CALL.



# BOROUGH OF NAUGATUCK

WATER POLLUTION CONTROL BOARD

229 CHURCH STREET  
NAUGATUCK, CT 06770  
203 / 720-7060  
FAX 203 / 720-7099

March 10, 2016

First Selectman, George Temple  
Oxford Town Hall  
486 Oxford Road  
Oxford, CT 06478-1298

**Re: Gunntown Road Odor Complaint**

Dear Honorable Temple:

The residents of Naugatuck in the Gunntown Road and Rubber Ave Extension area have been experiencing significant sewer odors over the last several years. Veolia, the Borough's sewer contractor has traced the odors to the Oxford sewer line.

Veolia provided your staff with chemicals to control sewer odors which did seem to be affective as complaints stopped for some time. Unfortunately, the number of complaints has increased again.

The Naugatuck WPCA as well as the affected residents are very concerned with this issue and need it resolved. If this issue does not get resolved, we will report it to the State of Connecticut, Department of Energy and Environmental Protection.

Please contact me at 203-720-7072 or email [jstewart@naugatuck-ct.gov](mailto:jstewart@naugatuck-ct.gov) as soon as possible to discuss what the Town of Oxford proposing to do to correct the problem.

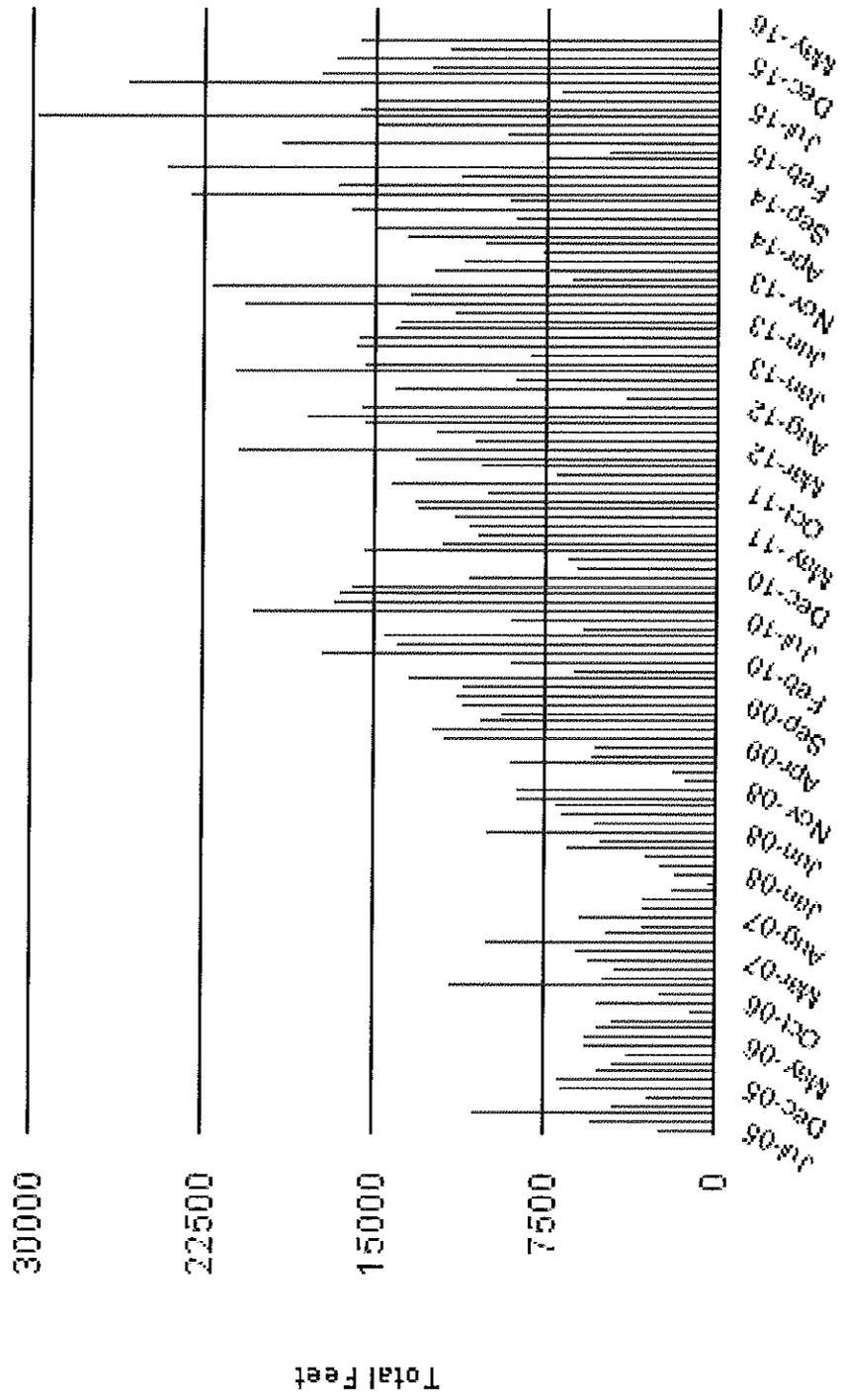
Sincerely,

*James Stewart*

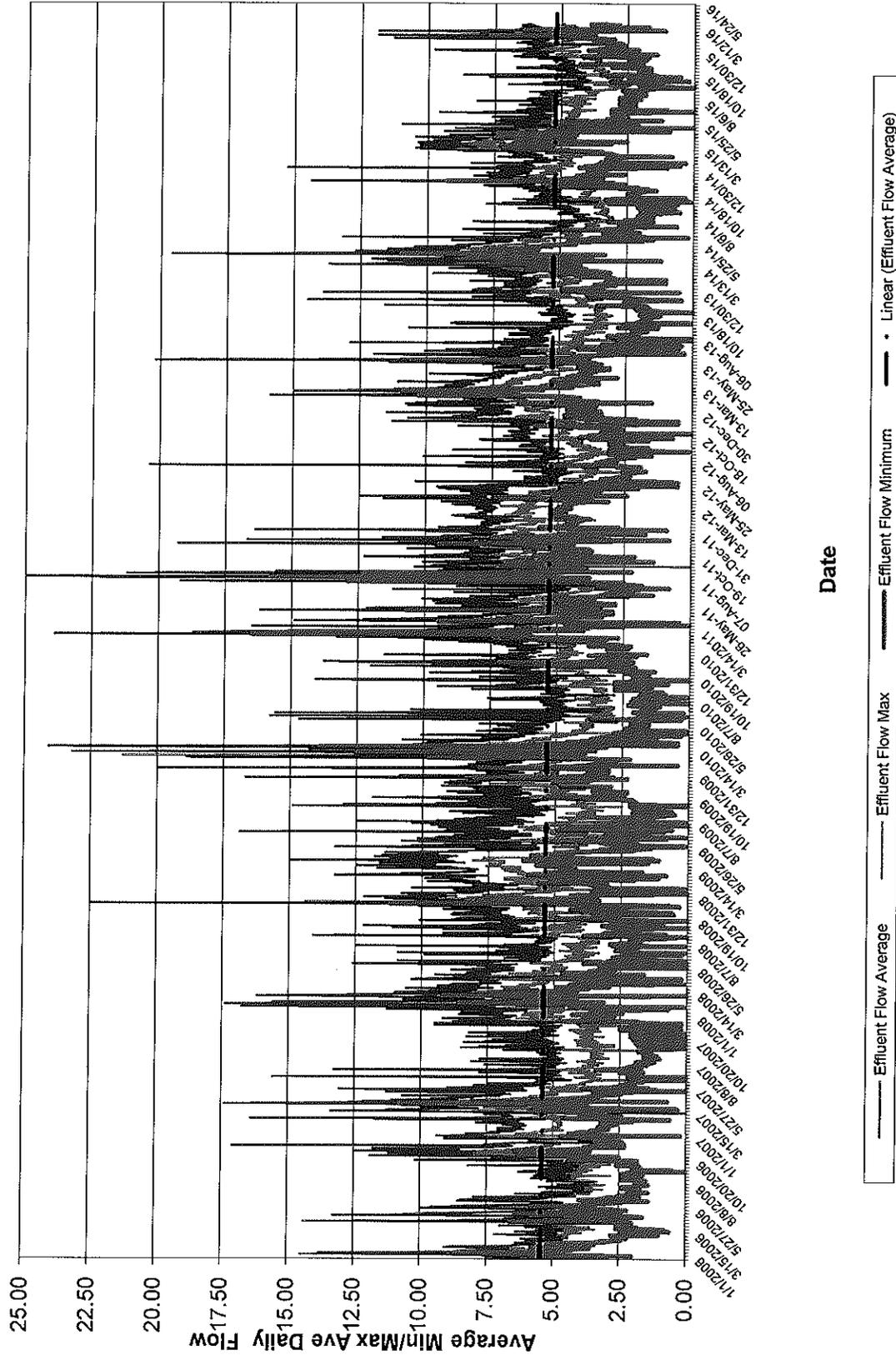
James Stewart  
Director of Public Works

Cc: Scott Halstead, Veolia Water, Naugatuck WPCA

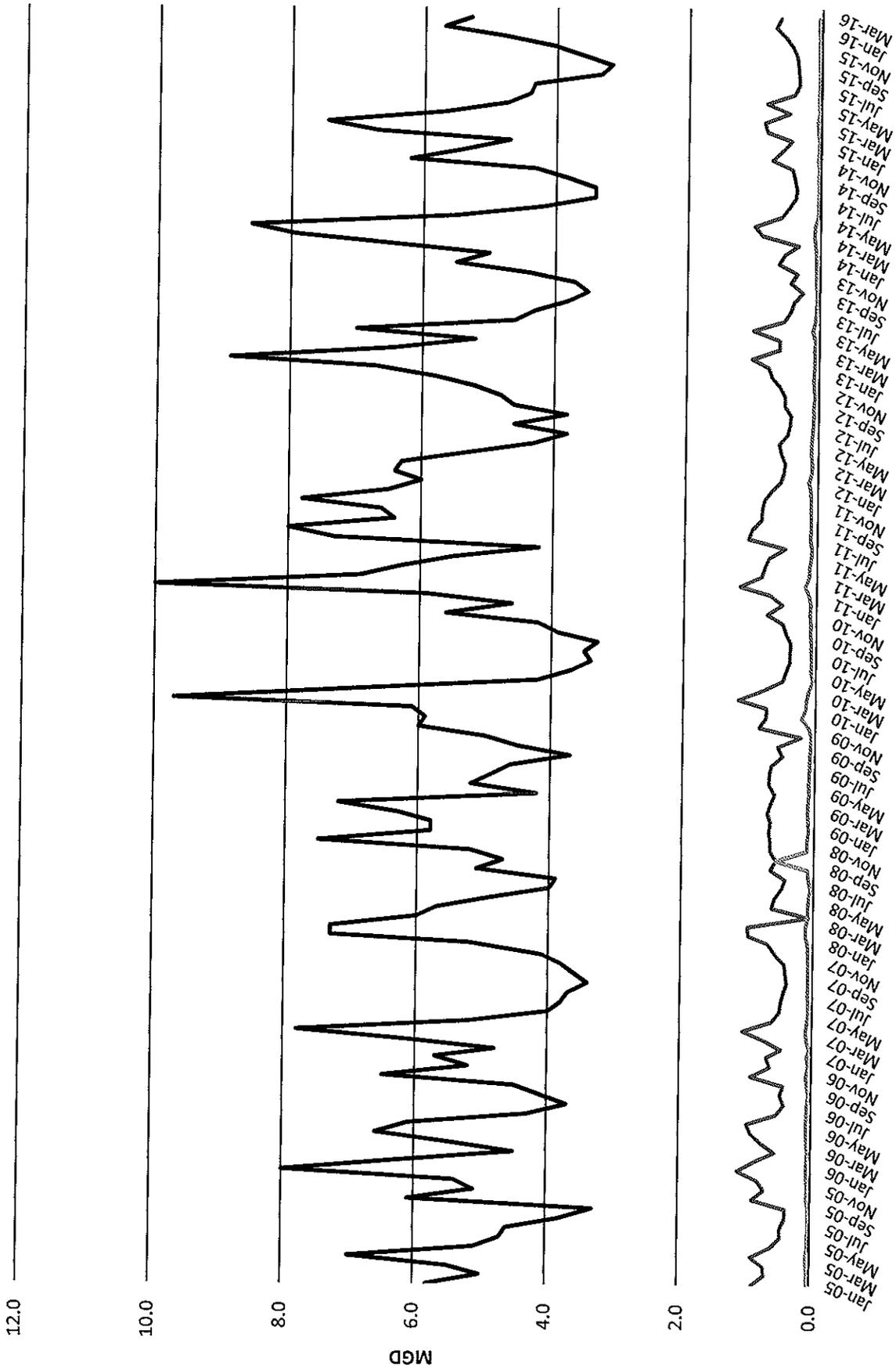
Borough of Naugatuck Total Feet of Sewers Cleaned July 2005 to Present



# Naugatuck WPCF Daily Min/Max/Total Flow Data 2006 to Present MGD



Naugatuck, Middlebury & Oxford - Average Monthly Flows  
2005 to Present



— Naugatuck    - - - Middlebury    ..... Oxford