



STATE OF CONNECTICUT )  
 )  
 vs. )  
 )  
 THE BOROUGH OF NAUGATUCK )  
 WATER POLLUTION CONTROL AUTHORITY )

ORDER NO. 2048 Mod1

CONSENT ORDER MODIFICATION

With the agreement of the Borough of Naugatuck Water Pollution Control Authority ("Respondent"), the Commissioner of Energy and Environmental Protection ("Commissioner") hereby modifies Consent Order No. 2048, issued on June 3, 2009 as follows:

Paragraphs A.6. through A.9. are added to Consent Order No. 2048:

- A.6. In June 2010, the Commissioner approved the Initial Report required by Paragraph B.4. of Consent Order No. 2048, which identified required remedial actions to abate odors and an associated schedule for completion.
- A.7. In accordance with Sections 22a-430-4(l) & (r) of the Regulations, on August 21, 2014, the Respondent was issued NPDES Permit No. CT0100641 ("Permit") by the Commissioner that contains new effluent limitations to meet Connecticut's Water Quality Standards. The Permit requires that the Respondent develop plans and implementation schedules for facility and operational improvements that are necessary to comply with the requirements and effluent limitations set forth in the Permit.
- A.8. Since the Respondent maintains and operates an existing fluidized bed sewage sludge incinerator referenced in Paragraph A.2. of Consent Order No. 2048, the Respondent is subject to the requirements and air emissions standards in 40 CFR Part 60 Subpart Mmmm for Existing Sewage Sludge Incineration Units. The Respondent has determined that modifications to the existing fluidized bed sewage sludge incinerator operation must be performed in order to comply with the requirements and air emission standards in 40 CFR Part 60 Subpart Mmmm.
- A.9. Due to the facility reconfiguration, construction and equipment upgrades that are necessary to meet water quality and air emission requirements described in Paragraphs A.7. and A.8. of this Consent Order Modification, the Respondent has not completed the following odor control improvements identified in the approved Initial Report:

- a. The installation of a hydrogen sulfide gas monitor on the scrubber serving the primary settling tanks and modifications to the reactor chamber and exhaust ventilation blower for the same scrubber.
- b. An increase of the discharge stack elevation and the installation of a hydrogen sulfide gas monitor on the dewatering area scrubber.
- c. Relocation of the grit receiving bin and the installation of an exhaust ventilation system and hood enclosure for the sludge cake receiving area.

Paragraphs B.1. through B.3. are added to Consent Order No. 2048:

- B.1. Respondent shall consider process optimization and control measures to mitigate odors at the premises in the design and implementation of the facility and operational improvements that are necessary to comply with the Respondent's Permit and 40 CFR Part 60 Subpart M MMM.
- B.2. Within ninety (90) days after the issuance of this Consent Order Modification, the Respondent shall submit for the Commissioner's review, a revised Title V permit application that includes a schedule of compliance per 40 CFR Part 70 that includes the plan and implementation schedule detailing the improvements to the sewage sludge incineration operation that are necessary to comply with the requirements of 40 CFR Part 60 Subpart M MMM.
- B.3. Within one-hundred eighty (180) days after the issuance of this Consent Order Modification, the Respondent shall submit for the Commissioner's review, consideration and written approval, a supplemental plan and implementation schedule ("Supplemental Plan") to complete the odor control improvements identified in Paragraphs A.9.a.-c. and B.1. of this Consent Order Modification. The Supplemental Plan shall address how the scheduled implementation of these odor control improvements will be coordinated with the scheduled implementation of the improvements identified in Paragraphs A.7. and B.2 of this Consent Order Modification. The Supplemental Plan may consider other engineering improvements that accomplish the odor mitigation goals of the odor control improvements identified in Paragraphs A.9.a.-c. of this Consent Order Modification.

Respondent consents to the issuance of this consent order modification without further notice. All other terms and conditions of Consent Order No. 2048 shall remain in full force and effect. The undersigned certifies that he/she is fully authorized to enter into this consent order and to legally bind the Respondent to the terms and conditions of the consent order.

Borough of Naugatuck WPCA

Signature: *Ronald J. Merancy*  
Type Name: *Ronald J Merancy*  
Type Title: *Chairman*  
Date: *4/19/16*

Issued as a final order of the Commissioner of the Department of Energy & Environmental Protection.

*Michael J. Sullivan*

Michael J. Sullivan  
Deputy Commissioner

*May 17, 2016*

Date

BOROUGH OF NAUGATUCK  
LAND RECORDS  
MAILED CERTIFIED MAIL,  
RETURN RECEIPT REQUESTED