

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Connecticut Galvanizing, Div. of Highway Safety Corp

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0030449 APPLICATION #: FACILITY ID. 054-051

<u>Mailing Address:</u>					<u>Location Address:</u>						
Street:	239 Commerce Street				Street:	239 Commerce Street					
City:	Glastonbury	ST:	CT	Zip:	06033	City:	Glastonbury	ST:	CT	Zip:	06033
Contact Name:	John Roy, Vice President				DMR Contact	John Roy, Vice President					
Phone No.:	860-659-4330				Phone No.:	860-659-4330					

PERMIT INFORMATION

DURATION 5 YEAR X 10 YEAR ___ 30 YEAR ___

TYPE New ___ Reissuance ___ Modification X

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

NPDES (X) PRETREAT () GROUND WATER(UIC) () GROUND WATER (OTHER) ()

NPDES MAJOR (MA) _____

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) _____

NPDES or PRETREATMENT MINOR (MI) X _____

PRETREAT SIGNIFICANT INDUS USER (SIU) _____

PRETREAT CATEGORICAL (CIU) _____

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

POLLUTION PREVENTION MANDATE ___ ENVIRONMENTAL EQUITY ISSUE ___

COMPLIANCE ISSUES

COMPLIANCE SCHEDULE **YES** NO (If yes check off what it is in relation to.)

POLLUTION PREVENTION ___ TREATMENT REQUIREMENT X WATER CONSERVATION

WATER QUALITY REQUIREMENT X REMEDIATION ___ OTHER _____

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

The facility is currently subject to CT DEP Consent Order Number WSWDH01010/WC0005324/1632 issued June 27, 2001.

OWNERSHIP CODE

Private X Federal State Municipal (town only) Other public

DEEP STAFF ENGINEER Karen Allen

PERMIT FEES

Discharge Code	DSN	Annual Fee
1080000	001	\$2912.50
1080000n	002	\$ 0
1080000n	003	\$ 0

FOR NPDES DISCHARGES

Drainage basin Code: 4007 - Hubbard Brook Water Quality Standard: A

Drainage basin Code: 4006 – Salmon Brook Water Quality Standard: A

NATURE OF BUSINESS GENERATING DISCHARGE

The facility galvanizes highway guide rails, signage structures, and miscellaneous metal products. The discharge consists of stormwater runoff from roofs and paved areas of the facility. The stormwater runoff is collected in 8 catch basins and discharges via 3 outfalls.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

Existing Site Conditions

DSN 001

Stormwater runoff from the employee parking lot, the area around the grinding shed and maintenance building, and the storage area at the west end of the site. The drainage area contributing to this outfall is approximately 3.48 acres. The untreated stormwater runoff discharges to the Town of Glastonbury separate storm sewer system prior to discharging to wetlands of Salmon Brook located northwest of the site.

DSN 002

Stormwater runoff from central and eastern portions of the site, including the east end of the galvanizing building, the fabrication shop and the office. The drainage area contributing to this outfall is approximately 2.2 acres. The untreated stormwater runoff discharges to wetlands of Hubbard Brook located south of Commerce Street.

DSN 003

Stormwater runoff from the area east of the fabrication shop. The drainage area contributing to this outfall is approximately 0.14 acres. The stormwater runoff discharges to a 3,500 gallon grit separator installed in June 2015. Since the installation of the separator, the stormwater has been manually pumped out and used in the galvanizing process, essentially eliminating this discharge. The Permittee intends to continue this practice of recycling the stormwater into the process however it is possible that under extreme weather events, the grit chamber will discharge to the Town of Glastonbury storm sewer system in Commerce Street and then to wetlands associated with Hubbard Brook.

MODIFICATION PROPOSAL

Future Conditions to be in place on or before June 30, 2017 (See attached site drainage map for catchment areas)

The Permittee is currently discharging stormwater associated with industrial activities under NPDES Permit No. CT0030449 issued September 20, 2011 but has been unable to comply with interim or final effluent limits. Therefore, the Permittee is proposing this modification in order to reduce or eliminate to the extent practicable, the discharge of untreated stormwater runoff from the material handling and processing areas of the site. The proposal involves the installation of a 248,000 gallon subsurface stormwater detention system and a 100 gallon per minute (gpm) WaveIonics (by WaterTectonics) stormwater treatment system. This treatment system uses a combination of pH adjustment, electrocoagulation and filtration to remove solids and heavy metals. In addition to the stormwater runoff presently discharging to DSN 001, realignment of the site's storm drain system will direct most of the stormwater runoff that is currently discharging to DSN 002 into this new detention/treatment system. The detention structure and treatment system will be capable of capturing and treating the runoff generated by 3.6 inches of rainfall in a 24-hour period.

DSN 001A

Stormwater runoff from all material handling and process areas (Catchments 1-6), except for Catchment 7 east of the fabrication shop, will be collected in the detention/treatment system. The Permittee has requested approval from the Glastonbury Water Pollution Control Authority to discharge the effluent from the treatment system to the Town of Glastonbury sanitary sewer line. Pending that approval, this permit is being modified to include the discharge of the treatment system to the existing stormwater outfall and drainage swale located northwest of the site and then to wetlands associated with Salmon Brook.

DSN 001B

Excess stormwater runoff generated by storm events resulting in greater than 3.6 inches of rainfall in 24 hours will be discharged through an oil/water/grit separator and then to the existing stormwater outfall and drainage swale located northwest of the site and then to wetlands associated with Salmon Brook.

DSN 002

As a result of the realignment of the storm drain system on site, stormwater runoff only from Catchment 8 (portion of the roof of the office building and office parking area) will continue to discharge to this outfall which drains into the Town of Glastonbury storm sewer system and then to wetlands associated with Hubbard Brook located south of Commerce Street.

DSN 003

Stormwater runoff from Catchment 7. No change from current conditions. See description above.

RESOURCES USED TO DRAFT PERMIT

- Federal Effluent Limitation Guideline 40 CFR _____
name of category
- Performance Standards
- Federal Development Document
- Treatability Manual
- Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy

— Coastal Management Consistency Review Form

X Other – DEEP’s *General Permit for the Discharge of Stormwater Associated with Industrial Activity*, effective October 1, 2011 and modified December 3, 2013. Reissued without modifications, effective October 1, 2016 - September 30, 2018 (industrial stormwater general permit).

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

Existing site conditions

- X Case-by-Case Determination using Best Professional Judgment (See General Comments) DSN 001, DSN 002-A, DSN 003 – interim limits for copper, lead, zinc

DSN 001, DSN 002, DSN 003 – final limits for oil and grease, pH and total suspended solids

DSN 002 – final limits for copper, lead, zinc
- X In order to meet in-stream water quality (See General Comments) DSN 001, DSN 002, DSN 003 – aquatic toxicity; final limits for copper, lead, zinc

Future site conditions (on or before June 30, 2017)

- X Case-by-Case Determination using Best Professional Judgment (See General Comments) DSN 001A, DSN 001B, DSN 002, DSN 003 – final limits for oil and grease, pH and total suspended solids
- X In order to meet in-stream water quality (See General Comments) DSN 001A, DSN 003 – aquatic toxicity; final limits for copper, lead, zinc

GENERAL COMMENTS

The DEEP’s *General Permit for the Discharge of Stormwater Associated with Industrial Activity* (industrial stormwater general permit) was used as a reference for the requirements for the Stormwater Pollution Prevention Plan referred to in this permit modification. Utilizing best professional judgment, the benchmarks contained in the general permit were incorporated into this permit modification as final limits for total oil and grease, pH and total suspended solids for all discharges. The requirements for benchmark monitoring contained in the general permit have been incorporated in this permit for chemical oxygen demand, nitrate-nitrogen, total Kjeldahl nitrogen and total phosphorus.

A monitoring requirement for ammonia-nitrogen, total chromium and total nickel has been included in this permit modification to develop the data necessary to evaluate all discharges for consistency with available acute aquatic life criteria.

Effluent limitations under future conditions

DSN 001A

The proposed stormwater detention structure and treatment system is capable of storing and treating the runoff generated by up to 3.6 inches of rainfall in a 24-hour period. Historical rainfall data for the area submitted by the Permittee indicates that this rainfall event constitutes over 99% of storm events that have occurred over the last 21 years. Although, relevant site-specific discharge data is not yet available, the stormwater treatability study performed by WaterTechtonics indicates that the Wavelonics System may be capable of reducing the concentration of copper, lead and zinc in the stormwater runoff to levels compliant with Connecticut’s Water Quality Standards.

Until adequate, site-specific discharge data from the treatment system becomes available, the discharge of stormwater runoff from DSN 001A will continue to be governed by the monitoring requirements and effluent limitations in the current permit. Monitoring requirements and effluent limitations for this outfall will be reevaluated as additional information becomes available and when Permit No. CT0030449 is renewed.

DSN 001B

Stormwater runoff generated by rainfall in excess of 3.6 inches in a 24 hour period will not be discharged through the detention structure and WaveLonics treatment system but instead will be discharged to an oil/water/grit separator and then to DSN 001. Under the new site conditions, the frequency and the water quality of this discharge are unknown. Therefore, this permit modification requires monitoring of this outfall on a quarterly basis. Utilizing best professional judgment, the benchmarks contained in the industrial stormwater general permit were incorporated into this permit as final limits for total oil and grease, pH and total suspended solids for all discharges. The requirements for benchmark monitoring contained in the general permit have been incorporated in this permit for chemical oxygen demand, nitrate-nitrogen, total Kjeldahl nitrogen and total phosphorus.

Monitoring requirements and effluent limitations for this outfall will be reevaluated as additional information becomes available and when Permit No. CT0030449 is renewed.

DSN 002

Realignment of the site's storm drain system will direct most of the stormwater runoff that is currently discharging to DSN 002 into the new detention/treatment system. As a result, the discharge to this outfall will consist only of stormwater runoff from a portion of the office building roof and the small parking area in front of the building. In order to determine the quality of the stormwater under these new site conditions, this outfall will continue to be monitored on a quarterly basis. Utilizing best professional judgment, the benchmarks contained in the industrial stormwater general permit were incorporated into this permit modification as final limits for total oil and grease, pH and total suspended solids. The requirements for benchmark monitoring contained in the general permit have been incorporated in this permit for chemical oxygen demand, nitrate-nitrogen, total Kjeldahl nitrogen and total phosphorus.

Monitoring requirements and effluent limitations for this outfall will be reevaluated as additional information becomes available and when Permit No. CT0030449 is renewed.

DSN 003:

There has been no discharge from this outfall since the installation of a 3,500 gallon grit separator in June 2015. It is possible however, that a discharge may occur under extreme weather conditions, so monitoring conditions and final water quality based effluent limits remain unchanged from the current permit.

Monitoring requirements and effluent limitations for this outfall will be reevaluated as additional information becomes available and when Permit No. CT0030449 is renewed.

COMPLIANCE SCHEDULE

This permit modification contains the following schedule:

- Section 10(A) requires the Permittee to install the proposed detention/treatment system on or before June 30, 2017;
- Section 10(B) requires the submittal of an updated Stormwater Pollution Prevention Plan and best management practices implementation schedule on or before October 31, 2016;
- Section 10(C) requires the submittal of a post-installation monitoring plan to evaluate the operation and efficiency of the stormwater detention/treatment system;
- Section 10(D) requires the submittal of a closure plan for the decommissioning and clean-up of the process and storage areas of the site, the collection and treatment system, and financial assurance to support the work required by the closure plan