

RECENT ENFORCEMENT HISTORY

Is the Permittee subject to a pending enforcement action? Yes X No ___

Consent Order SRD-193 was issued October 20, 2008 to enforce a Sediment Sampling Plan for Exide Group, Inc. as a result of environmental investigations of the Mill River beginning in approximately 1981. Order SRD-193 requires Exide Group, Inc. to provide remedial action to the surface and ground waters of the Mill River. Exide Group, Inc. is also required to submit sediment, surface water and ground water monitoring plans to DEEP as well as apply for all permits necessary to carry out the remedial action approved by the Commissioner through Consent Order SRD-193.

OWNERSHIP CODE

Private X Federal ___ State ___ Municipal (town only) ___ Other public ___

DEP STAFF ENGINEER/ANALYST Don Gonyea

PERMIT FEES

Discharge Code	DSN Number	Annual Fee
1090000	101	4,337.50

FOR NPDES DISCHARGES

Drainage basin Code: 7108 Present/Future Water Quality Standard: SA

NATURE OF BUSINESS GENERATING DISCHARGE

In response to Consent Order SRD-193-iss, Exide Group, Inc. proposes to discharge treated wastewater as a result of dewatering activities from dredging approximately 27,600 cubic yards of lead-impacted sediment in the Mill River.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 101

Treated wastewater discharge to the Mill River is generated from dredged sediment piped via dual wall flexible piping as a slurry via booster pump. Sediment will be pumped to the upland staging parcel at 2190 Post Road. Sediment will then be treated with flocculant and piped to geotextile bags for filtration/dewatering. Resultant filtrate will be collected at a central sump on the east side of the upland parcel and pumped through fractionation tanks. Wastewaters will then be stored in an equalization tank and will receive additional filtration if necessary to meet permit limits prior to discharge to the Mill River via discharge manifold located in the main river channel.

RESOURCES USED TO DRAFT PERMIT

- Department File Information
- Connecticut Water Quality Standards
- Coastal Management Consistency Review Form
- Other – Department Order referenced earlier, plus coordination with the Remediation Division

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

- Best Professional Judgement (See Other Comments)
- Case by Case Determination (See Other Comments)
- Section 22a-430-4(s) of the Regulations of Connecticut State Agencies
- In order to meet in-stream water quality (See General Comments)
- Anti-degradation policy

GENERAL COMMENTS

The activities authorized within this permit have been reviewed for consistency with the Connecticut Antidegradation Policies and associated implementation guidance contained in the Connecticut Water Quality Standards. The authorized activities are consistent with maintenance and protection of water quality in accordance with Tier I Antidegradation Evaluation and Implementation Review provisions of the Connecticut Water Quality Standards.)

The need for inclusion of water quality based discharge limitations in this permit was evaluated consistent with Connecticut Water Quality Standards and criteria, pursuant to 40 CFR 122.44(d). Each parameter was evaluated for consistency with the available aquatic life criteria (acute and chronic) and human health (fish consumption only) criteria, considering the zone of influence allocated to the facility where appropriate. The statistical procedures outlined in the EPA Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001) were employed to calculate the need for such limits. Based on this review, water quality based limits for lead were included in the permit at this time.