

PERMITTING
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What You Need to Know About Proposed
Changes to Connecticut Industrial Wastewater
Permits

Two new draft wastewater permits are on the table that will impact industrial wastewater discharges. On January 14th the Connecticut Department of Energy & Environmental Protection (CT DEEP) released draft copies of two proposed wastewater permits that are scheduled to replace the Categorical General Permit, Vehicle Wastewater General Permit, and the Miscellaneous General Permit. Note that the CT DEEP has opened its comment period until Thursday, February 14th and is urging all registrants and publicly owned treatment works(POTWs) to provide remarks for the State’s consideration.

The new permits – The General Permit for Discharges of Miscellaneous Sewer Compatible Wastewater from Industrial Users (IU GP) and the General Permit for the Discharge of Wastewaters from Significant Industrial Users (SIU GP) – are designed to separate wastewater dischargers into two regulatory categories defined by the type of discharge (e.g. Boiler Blowdown, Metal Finished, etc.), volume of flow (measured in gallons per day (GPD) discharged), and/or percentage of flow to the POTW. Please refer to the table below for a matrix designed to assist facilities in determining which Wastewater General Permit is correct for them.

| <i>Industrial User (IU) & Significant Industrial User (SIU) Registration Table</i> | | <i>DISCHARGE TYPE</i> | | |
|--|---|-----------------------------------|--------------------------------|---------------------------------------|
| | | Metal Finishing Wastewater | Process Flow Wastewater | Non-Process Flow Wastewater*** |
| <i>FLOW VOLUME</i> | Less than 25,000 GPD but Greater than 5 % total flow to POTW | SIU GP | SIU GP | IU GP |
| | Less than 25,000 GPD and less than 5 % total flow to POTW | SIU GP | IU GP | IU GP |
| | Greater than 25,000 GPD | SIU GP | SIU GP | IU GP |

***Note: If a facility discharges only non-process wastewater, they are required to register for the IU GP, regardless of volume. However, if a facility discharges a combination of process and non-process discharges, they may require registration under the SIU GP if they are above the 25,000 GPD or 5% total flow to POTW.

The Industrial User General Permit: One of the most important details that came from the release of these draft permits is that the State is delegating its regulatory authority to the local POTWs for facilities that are required to register for the IU GP. For registrants, that means that all filings, fees, approvals, and monitoring reports will be handled entirely at the municipal level. For POTWs, this could mean an increase in staffing to handle registrations and administrative requirements associated with the new regulatory requirements.

In addition to that, the IU GP has removed the minimum threshold requirement for registration. Previously, wastewater general permits only required registration if your facility discharged great than 1,000 GPD for a Group I discharge (e.g. Boiler Blowdown, Water Treatment Wastewater, etc.) or 5,000 GPD for a Group II discharge (e.g. Non-contact cooling water, Food processing wastewater, etc.). With the new IU GP, even a discharge of 10 GPD would require registration with the local POTW. Currently, the State estimates that there are approximately 1,500 to 1,700 facilities currently registered for the existing permits. However, they have no metrics on how many additional facilities will need to file registrations when the new permit roll out with its lower threshold requirement.

The Significant Industrial User General Permit: The State will maintain its regulatory authority for registrants of the SIU GP. For facilities identified as “Significant Industrial Users”, CT DEEP requires that all registrations submitted include an additional 3rd Party Review by a Qualified Professional Engineer (QPE). The Permit defines a QPE as an individual who does not work directly for the registrant, nor has had any part in the registration process or development of any compliance plans (e.g. Operation & Maintenance Plan) for the registrant. This requirement prevents businesses from completing registrations entirely in-house, and can may cost registrants an additional \$3,000 - \$7,000.

What Facilities Can Do Now: As noted above, the CT DEEP has opened its comment period until Thursday, February 14th and is urging all registrants and POTWs to provide remarks for the State’s consideration.

CT DEEP has also stated that there will be no grandfathering in of any facilities who currently hold registration under any of the existing wastewater general permits. This also applies to facilities who were required to registered for the current wastewater permits in 2018 when the State discontinued the existing permits (e.g. Water Treatment Wastewater General Permit, Food Processing General Permit, etc.). As such, all facilities will have to re-register for one of the two new permits when they are released.

For a complete list of process and non-process flow wastewater streams, or to follow up with any questions that you might have regarding your facilities operations, please contact **Joe Mastrangelo at (860) 852-5223**.



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