BUREAU OF WATER MANAGEMENT

PERMITTING AND ENFORCEMENT DIVISION

NPDES PERMIT

issued to

Silgan Plastics Corporation
38 Bridge Street
Deep River, CT 06417

Location Address:

38 Bridge Street
Deep River, CT 06417

Facility ID: 036-025

Permit ID: CT0000787

Receiving Stream: Deep River

Permit Expires: March 7, 2011

SECTION 1: GENERAL PROVISIONS

(A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and section 402(b) of the Clean Water Act, as amended, 33 USC 1251, et. seq., and pursuant to an approval dated September 26, 1973, by the Administrator of the United States Environmental Protection Agency for the State of Connecticut to administer an N.P.D.E.S. permit program.

(B) **Silgan Plastics Corporation,** ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsection (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(10)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

(a) Definitions
(b) General
(c) Inspection and Entry
(d) Effect of a Permit
(e) Duty
(f) Proper Operation and Maintenance
(g) Sludge Disposal
(h) Duty to Mitigate
(i) Facility Modifications; Notification
(j) Monitoring, Records and Reporting Requirements
(k) Bypass
(l) Conditions Applicable to POTWs
(m) Effluent Limitation Violations (Upsets)
(n) Enforcement
(o) Resource Conservation
(p) Spill Prevention and Control
(q) Instrumentation, Alarms, Flow Recorders
(r) Equalization

Section 22a-430-4 Procedures and Criteria

(a) Duty to Apply

(b) Duty to Reapply
(c) Application Requirements
(d) Preliminary Review
(e) Tentative Determination
(f) Draft Permits, Fact Sheets
(g) Public Notice, Notice of Hearing
(h) Public Comments
(i) Final Determination
(j) Public Hearings
(k) Submission of Plans and Specifications Approval
(l) Establishing Effluent Limitations and Conditions
(m) Case by Case Determinations
(n) Permit issuance or renewal
(o) Permit Transfer
(p) Permit revocation, denial or modification
(q) Variances
(r) Secondary Treatment Requirements
(s) Treatment Requirements for Metals and Cyanide
(t) Discharges to POTWs - Prohibitions

(C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action including, but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA.

(D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.

(E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner. To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner, at least 30 days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure, by the transferee, to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.

(F) No provision of this permit and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by the Permittee pursuant to this permit will result in compliance or prevent or abate pollution.

(G) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.

(H) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the Regulations of Connecticut State Agencies.

(I) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the Connecticut General Statutes)

SECTION 2: DEFINITIONS

(A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and section 22a-430-3(a) and 22a-430-6 of the RCSA, except for "No observable acute

effect level (NOAEL)" which is redefined below.

(B) In addition to the above, the following definitions shall apply to this permit:

"-----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the DMR.

"Average Monthly Limit"; means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l); otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.

"Critical Test Concentration (CTC)" means the specified effluent dilution at which the Permittee is to conduct a single-concentration Aquatic Toxicity test.

"Grab Sample Average" ("GSA"), means the arithmetic average of all grab sample analyses. Grab samples shall be collected at least once every four hours over a full operating day for as long as a discharge exists on that day (minimum of two grab samples per day)

"Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit", means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l); otherwise, it means the maximum allowable "Daily Quantity" as defined above, unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"NA" as a Monitoring Table abbreviation means "not applicable".

"No Observable Acute Effect Level (NOAEL)" means any concentration equal to or less than the critical test concentration in a single concentration (pass/fail) toxicity test conducted pursuant to section 22a-430-3(j)(7)(A)(i) RCSA demonstrating 90% or greater survival of test organisms at the CTC.

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of February, May, August and November.

"Range During Month" ("RDM"), as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Range During Sampling" ("RDS"), as a sample type, means the maximum and minimum of all values recorded as a result of analyzing each grab sample of; 1) a Composite Sample, or, 2) a Grab Sample Average. For those Permittees with continuous monitoring and recording pH meters, Range During Sampling means the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"Semi-Annual" in the context of a sampling frequency, means the sample must be collected in the months of August and October.

SECTION 3: COMMISSIONER'S DECISION

(A) The Commissioner of Environmental Protection ("Commissioner") has issued a final determination and found that continuance of the existing discharge will not cause pollution of the waters of the state. The Commissioner's decision is based on **application # 200003151** for permit reissuance received on

November 20, 2000 and the administrative record established in the processing of that application.

(B) The Commissioner hereby authorizes the Permittee to discharge in accordance with the provisions of this permit, the above referenced application, and all approvals issued by the Commissioner or the Commissioner authorized agent for the discharges and/or activities authorized by, or associated with, this permit.

(C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions, which may be authorized under the Federal Clean Water Act or the CGS or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or CGS or regulations adopted thereunder which are then applicable.

SECTION 4: GENERAL EFFLUENT LIMITATIONS

(A) No discharge shall contain, or cause in the receiving stream, a visible oil sheen or floating solids; or, cause visible discoloration or foaming in the receiving stream.

(B) No discharge shall cause acute or chronic toxicity in the receiving water body beyond any zone of influence specifically allocated to that discharge in this permit.

(C) The temperature of any discharge shall not increase the temperature of the receiving stream above 85^{o}F, or, in any case, raise the temperature of the receiving stream by more than 4^{o}F.

SECTION 5: SPECIFIC EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(A) The discharges shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables next page:

Table A

Discharge Serial Number (DSN): 001-1 | **Monitoring Location:** 1

Wastewater Description: Treated Cooling Tower and Air Compressor Blowdown.

Monitoring Location Description: Southeast corner wall of the compressor blowdown room between the totalizing water meter and the 30 gallon sampler overflow drum.

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test [4]
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency	Sample Type or measurement to Be reported	
Aquatic Toxicity, Daphnia, Pulex [1]	%	NA	LC50 > 20%	Semi-Annual	Daily Composite	LC50 > 6.67%	NR	NA	
Aquatic Toxicity, Pimephales Promelas [1]	%	NA	LC50 > 20%	Semi-Annual	Daily Composite	LC50 > 6.67%	NR	NA	
Flow, Maximum Daily [2]	gpd	NA	3,050	Daily / Monthly	Daily Flow	NA	NR	NA	
Bromide, Total	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Copper, Total	mg/l	0.48	0.7	Quarterly	Daily Composite	1.05	NR	Grab Sample	+
Lead, Total	mg/l	0.1	0.2	Quarterly	Daily Composite	0.3	NR	Grab Sample	+
Molybdenum, Total	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Nickel, Total	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	+
Zinc, Total	mg/l	1.2	1.8	Quarterly	Daily Composite	2.7	NR	Grab Sample	+
Nitrogen, Ammonia (total as N)	mg/l	NA	3.0	Quarterly	Daily Composite	4.5	NR	Grab Sample	
Total Dissolved Solid (TDS)	mg/l	NA	1500	Quarterly	Daily Composite	NA	NR	NA	
Chlorine, Total Residual	mg/l	NA	NA	NR	NA	1.3	Quarterly	Grab Sample	+
Oil & Grease, Total	mg/l	10.0	20.0	Monthly	Grab Sample Average [3]	20.0	NR	Grab Sample	
Temperature	^{o}F	NA	NA	NR	NA	85	Daily / Monthly	Grab Sample	
pH, Continuous	S.U.	NA	NA	NR	NA	6.0 – 9.0	Continuous/Monthly	Range During Month	

Table Footnotes and Remarks:

Footnotes:

Note: All analysis shall be on the same sample.

1 The results of the Toxicity Tests are recorded in % survival, however, the Permittee shall report pass/fail on the DMR based on criteria in Section 6(B) of this permit.

2 For this parameter the permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Maximum Daily Flow for each sampling month.

3 Grab Sample Average means the arithmetic average of all grab sample analyses. At least three (3) grab samples for total oil and grease analysis shall be collected over the 5-6 hour period that the treatment system for air compressor blowdown is discharged.

4 Minimum Level Test refers to Section 6 Paragraph (A) of this permit.

Table B

Discharge Serial Number: 002-1 | **Monitoring Location:** 1

Wastewater Description: Treated Drainage of Non-Contact Cooling Water from Closed-Loop System.

Monitoring Location Description: Southeast corner wall of the compressor blowdown room between the totalizing water meter and the 30 gallon sampler overflow drum.

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test 4
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency	Sample Type or measurement to be reported	
Aquatic Toxicity, Daphnia, Pulex 1	%	NA	NA	NR	NA Annual5	LC50>6.67%		Grab Sample	
Aquatic Toxicity, Pimephales Promelas 1	%	NA	NA	NR	NA Annual5	LC50>6.67%		Grab Sample	
Flow, Maximum Daily 2	gpd	NA Annual5	200		Daily Flow	NA	NR	NA	
Copper, Total	mg/l	NA	NA	NR	NA Annual5	0.5		Grab Sample	+
Lead, Total	mg/l	NA	NA	NR	NA Annual5	0.3		Grab Sample	+
Nickel, Total	mg/l	NA	NA	NR	NA Annual5	-----		Grab Sample	+
Zinc, Total	mg/l	NA	NA	NR	NA Annual5	1.2		Grab Sample	+
Nitrogen, Ammonia Total (as N)	mg/l	NA	NA	NR	NA Annual5	3.0		Grab Sample	
Total Dissolved Solid (TDS)	mg/l	NA	NA	NR	NA Annual5	1500		Grab Sample	
Chlorine, Total Residual	mg/l	NA	NA	NR	NA Annual5	0.9		Grab Sample	+
Oil & Grease, Total	mg/l	NA	NA	NR	NA Annual5	10.0		Grab Sample	
Temperature	°F	NA	NA	NR	NA	85	Annual5	Grab Sample	
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 – 9.0	Annual5	Grab Sample	

Table Footnotes and Remarks:

Footnotes:

Note: All analysis shall be on the same sample.

[1] The results of the Toxicity Tests are recorded in % survival, however, the Permittee shall report pass/fail on the DMR based on criteria in Section 6(B) of this permit.

[2] For this parameter the permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Maximum Daily Flow for each sampling month.

[4] Minimum Level Test refers to Section 6 Paragraph (A) of this permit.

[5] Annual in the Sampling Frequency means the permittee shall sample the wastewater at least once per year if a discharge occurs. For months in which no discharge occurs, and months after the annual sampling has been reported, the permittee shall write "Monitoring Conditional" on the monthly discharge monitoring reports.

Remarks:

The permittee shall record maximum and minimum pH values for each day of discharge. The pH results for each day of sampling shall be kept on-site.

(1) All samples shall be comprised of only the wastewater described in this table. Samples shall be collected prior to combination with receiving waters or wastewater of any other type, and after all approved treatment units, if applicable. All samples collected shall be representative of the discharge during standard operating conditions.

(2) In cases where limits and sample type are specified but sampling is not required by this permit, the limits specified shall apply to all samples, which may be collected and analyzed by the Department of Environmental Protection personnel, the Permittee, or other parties.

(3) The limits imposed on the discharges listed in this permit take effect on the issuance date of this permit, hence any sample taken after this date which, upon analysis, shows an exceedance of permit limits will be considered non-compliance.

(4) The monitoring requirements begin on the date of issuance of this permit if the issuance date is on or before the 12th day of a month. For permits issued on or after the 13th day of a month, monitoring requirements begin the 1st day of the following month.

SECTION 6: SAMPLE COLLECTION, HANDLING and ANALYTICAL TECHNIQUES

(A) Chemical Analysis

(1) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved pursuant to the Code of Federal Regulations, Part 136 of title 40 (40 CFR 136) unless an alternative method has been approved in writing pursuant to 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.

(2) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR 136 unless otherwise specified.

(3) The Minimum Levels specified below represent the concentrations at which quantification must be achieved and verified during the chemical analyses for the parameters identified in Section 5 Table A & B. Analyses for these parameters must include check standards within ten percent of the specified Minimum Level or calibration points equal to or less than the specified Minimum Level.

Parameter	Minimum Level
Chlorine, total residual	20.0 ug/L
Copper	5.0 ug/L
Lead	5.0 ug/L
Nickel	5.0 ug/L
Zinc	10.0 ug/L

(4) The value of each parameter for which monitoring is required under this permit shall be reported to the maximum level of accuracy and precision possible consistent with the requirements of this section of the permit.

(5) Effluent analyses for which quantification was verified during the analysis at or below the minimum

levels specified in this section and which indicate that a parameter was not detected shall be reported as "less than x" where 'x' is the numerical value equivalent to the analytical method detection limit for that analysis.

(6) Results of effluent analyses which indicate that a parameter was not present at a concentration greater than or equal to the Minimum Level specified for that analysis shall be considered equivalent to zero (0.0) for purposes of determining compliance with effluent limitations or conditions specified in this permit.

(B) Acute Aquatic Toxicity Test

(1) Samples for monitoring of Aquatic Toxicity shall be collected and handled as prescribed in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012).

(a) Composite and Grab samples shall be chilled immediately following collection. Samples shall be held at 4 degrees Centigrade until Aquatic Toxicity testing is initiated.

(b) Effluent samples shall not be dechlorinated, filtered, or, modified in any way, prior to testing for Aquatic Toxicity unless specifically approved in writing by the Commissioner for monitoring at this facility.

(c) Chemical analyses of the parameters identified in Section 5 Tables A & B shall be conducted on an aliquot of the same sample tested for Aquatic Toxicity.

(i) At a minimum, pH, specific conductance, total alkalinity, total hardness, and total residual chlorine shall be measured in the effluent sample and, during Aquatic Toxicity tests, in the highest concentration of test solution and in the dilution (control) water at the beginning of the test and at test termination. If Total Residual Chlorine is not detected at test initiation, it does not need to be measured at test termination. Dissolved oxygen, pH, and temperature shall be measured in the control and all test concentrations at the beginning of the test, daily thereafter, and at test termination. Salinity shall be measured in each test concentration at the beginning of the test and at test termination.

(d) Tests for Aquatic Toxicity shall be initiated within 24 hours of sample collection.

(2) Monitoring for Aquatic Toxicity to determine compliance with the permit limit on Aquatic Toxicity (invertebrate) above shall be conducted for 48-hours utilizing neonatal Daphnia pulex (less than 24-hours old)

(3) Monitoring for Aquatic Toxicity to determine compliance with the permit limit on Aquatic Toxicity (vertebrate) above shall be conducted for 48-hours utilizing larval Pimephales promelas (1-14 days old with no more than 24-hours range in age).

(4) Tests for Aquatic Toxicity shall be conducted as prescribed for static non-renewal acute tests in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012), except as specified below.

(a) Definitive (multi-concentration) testing, with LC50 as the endpoint, shall be conducted to determine compliance with limits on Aquatic Toxicity and monitoring conditions and shall incorporate, at a minimum, the following effluent concentrations:

(i) For Aquatic Toxicity Limits expressed as LC50 values between 15% and 33% and for monitoring only conditions: 100%, 50%, 25%, 12.5%, and 6.25%

(b) Organisms shall not be fed during the tests.

(c) Copper nitrate shall be used as the reference toxicant in tests with freshwater organisms.

(c) Synthetic freshwater prepared with deionized water adjusted to a hardness of 50 mg/L (plus or minus 5 mg/L) as $CaCO_3$ shall be used as dilution water in tests with freshwater organisms.

(5) Compliance with limits on Aquatic Toxicity shall be determined as follows:

(a) For limits expressed as a minimum LC50 value, compliance shall be demonstrated when the results of a valid definitive Aquatic Toxicity test indicates that the LC50 value for the test is greater than the Aquatic Toxicity Limit

SECTION 7: REPORTING REQUIREMENTS

(A) The results of chemical analyses and any aquatic toxicity test required above shall be entered on the Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Water Management (Attn: DMR Processing) at the following address. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at this address by the last day of the month following the month in which samples are collected.

Bureau of Water Management (Attn: DMR Processing)
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

(B) Complete an accurate aquatic toxicity test data, including percent survival of test organisms in each replicate test chamber, LC50 values and 95% confidence intervals for definitive test protocols, and all supporting chemical/physical measurements performed in association with any aquatic toxicity test, including measured daily flow and hours of operation for the 30 consecutive operating days prior to sample collection if compliance with a limit on Aquatic Toxicity is based on toxicity limits based on actual flows described in Section 7, shall be entered on the Aquatic Toxicity Monitoring Report form (ATMR). The ATMR shall be received at this address by the last day of the month following the month in which samples are collected.

Bureau of Water Management (Attn: Aquatic Toxicity)
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

(C) If this permit requires monitoring of a discharge on a calendar basis (e.g. Monthly, quarterly, etc.), but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit

the DMR and ATMR, as scheduled, indicating "NO DISCHARGE". For those Permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.

SECTION 8: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

(A) If any sample analysis indicates that an Aquatic Toxicity effluent limitation in Section 5 of this permit has been exceeded, or that the test was invalid, another sample of the effluent shall be collected and tested for Aquatic Toxicity and associated chemical parameters, as described above in Section 5 and Section 6, and the results reported to the Bureau of Water Management (Attn: DMR Processing), at the address listed above, within 30 days of the exceedance or invalid test. Results of all tests, whether valid or invalid, shall be reported.

(B) If any two consecutive test results or any three test results in a twelve month period indicates that an Aquatic Toxicity Limit has been exceeded, the Permittee shall immediately take all reasonable steps to eliminate toxicity wherever possible and shall submit a report to Bureau of Water Management (Attn: Aquatic Toxicity) for the review and approval of the Commissioner in accordance with section 22a-430-3(j)(10)(c) of the RCSA describing proposed steps to eliminate the toxic impact of the discharge on the receiving water body. Such a report shall include a proposed time schedule to accomplish toxicity reduction and the Permittee shall comply with any schedule approved by the Commissioner.

(C) The Permittee shall notify the Bureau of Water Management, Permitting and Enforcement Division, within 72 hours and in writing within thirty days of the discharge of any substance listed in the application but not listed in the permit if the concentration or quantity of that substance exceeds two times the level listed in the application.

This permit is hereby issued on 3/8/06.

GINA MCCARTHY
Gina McCarthy
Commissioner

GM/BBF

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Silgan Plastics Corporation **PAMS Company ID:** 47658

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0000787 APPLICATION #: 200003151 FACILITY ID. 036-025

Mailing Address:			**Location Address:**		
Street: 38 Bridge Street			**Street:** 38 Bridge Street		
City: Deep River	**ST:** CT	**Zip:** 06417	**City:** Deep River	**ST:** CT	**Zip:** 06417
Contact Name: Steve Monahan			**DMR Contact:** Steve Monahan		
Phone No.: 860-526-6370			**Phone No.:** 860-526-6370		

PERMIT INFORMATION

DURATION 5 YEAR _X_ 10 YEAR ___ 30 YEAR _

TYPE New _ Reissuance _X_ Modification ___

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 SCHEDULE **YES _** **NO X**

POLLUTION PREVENTION ___ TREATMENT REQUIREMENT___ WATER CONSERVATION_

WATER QUALITY REQUIREMENT ___ REMEDIATION ___ OTHER _X_(acute toxicity monitoring report)___

IS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? NO_X_ YES __

OWNERSHIP CODE

Private _X_ Federal __ State __ Municipal (town only) _ Other public _

DEP STAFF ENGINEER: Barak Brako Frempong

PERMIT FEES

Discharge Code	DSN	Annual Fee
1170000	001-1	$ 4,087.50
102000N	002-1	$ 0.00

Note: Annual Fee 50% increase applied

FOR NPDES DISCHARGES

Drainage basin Code: **4018** Present/Future Water Quality Standard: **B**

NATURE OF BUSINESS GENERATING DISCHARGE

Silgan Plastics Corporation manufactures polyethylene blow molded bottles for pharmaceutical, household and cosmetics industries. The process generates a wastewater discharge, which is directed to the two spray cooling tower blowdown systems and the plant's air compressor blowdown.

Some bottles are labeled or printed using a process called silkscreen. In silkscreen process, bottles are placed through a press and artwork is printed on the outside surface. Ultraviolet ink is used in the silkscreen process. Ultraviolet light is focused on printed bottles to cure the ink at high rates. There is a different screen for each color of ink used in the artwork. Each screen-prints each color; the bottle is then exposed to the ultra violet light that cures the color. Then the bottle enters another pass for the next color, and the process continues depending on the number of passes or different colors requested. However, this silkscreen process does not generate any wastewater because at no time does any silkscreen product, by-product or equipment need to be rinsed (e.g. computer printer).

PROCESS AND TREATMENT DESCRIPTION (by DSN)

Wastewater that is discharged as DSN001-1 is generated from blowing down two cooling towers and condensate/ blowdown collected from air compressors.

The cooling tower blowdown passes through a series of filters, including two (2) five (5) micron particulate filters, a carbon filter and then through an ion exchange treatment system to remove zinc from the wastewater discharge. The discharge is then collected in a 30 gallon overflow holding tank along with the air compressor blowdown.

The air compressor blowdown from the seven air compressors is collected in an above ground storage tank (in a 500 gallon collection tank) where the oil is skimmed off the water. The wastewater then flows through four filters and then discharged to the river. The first two filters are three (3) micron polypropylene filters, the third filter is an activated carbon filter, and the final filter is a five (5) micron Micro-Kleen II particulate filter, and it combines with the cooling tower blowdown. The combined wastewater streams flow through a zinc removal filter and then into an overflow holding tank (30 gallon) with pH recorder installed to the tank. There is a pipe at the bottom of the tank that discharge to the river.

DSN002-1 consists of non-contact cooling water that is drained from closed loop system. This discharge is only required when maintenance is done on the system, and this occurs very infrequently.

RESOURCES USED TO DRAFT PERMIT

__ Federal Effluent Limitation Guideline 40 CFR
name of category

__ Performance Standards

__ Federal Development Document _____
name of category

__ Treatability Manual

__X__ Department File Information

__X__ Connecticut Water Quality Standards

__ Anti-degradation Policy

__ Coastal Management Consistency Review Form

__ Other - Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

__X__ Case-by-Case Determination (See Other Comments)
DSN 001-1: pH, Total Bromide, Total Copper, Total Lead, Total Molybdenum, Total Nickel, Total Zinc, Total Ammonia, Total Dissolved Solid (TDS), Total Residual Chlorine, Total Oil & Grease {used section 22a-430-4(s) as a guide for Total Oil & Grease} and Temperature.

DSN 002-1: pH, Total Bromide, Total Copper, Total Lead, Total Molybdenum, Total Nickel, Total Zinc, Total Ammonia, Total Dissolved Solid (TDS), Total Residual Chlorine, Total Oil & Grease {used section 22a-430-4(s) as a guide for Total Oil & Grease} and Temperature.

__X__ In order to meet in-stream water quality (See General Comments)

GENERAL COMMENTS

Water quality based discharge limitations were included in this permit for consistency 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 limits. The most restrictive of the water quality limitations, aquatic life acute, aquatic life chronic, and human health, was compared with limitations developed according to State and Federal Best Available Technology (BAT). Where the water quality based limitations were more restrictive than BAT, the water quality based limitation was included in the permit as a concentration limit in addition to the BAT concentration limit. In this case, there are no BAT limits per state or federal categorical regulations.

OTHER COMMENTS

Consistent with our application review and permit development process, the effluent limits were developed with a Case-by-Case Determination using the criteria of Best Professional Judgment as noted above.

Limits for Total Copper and Total Lead were modified to reflect water quality standards. Also, a water quality limit has been included in this permit for Total Zinc, and the monitoring frequency has changed from Monthly to Quarterly.

Temperature limit is provided in this permit based on a review of Silgan Plastics Corporation Discharge Monitoring Reports (DMRs) for the last five years.

NOTICE OF TENTATIVE DETERMINATION INTENT TO RENEW A NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR THE FOLLOWING DISCHARGE INTO THE WATERS OF THE STATE OF CONNECTICUT

TENTATIVE DETERMINATION

The Commissioner of Environmental Protection hereby gives notice that the Department has made a tentative determination to renew a permit based on an application submitted by the Greenwich American, Inc. ("the applicant") under Section 22a-430 of the Connecticut General Statutes for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative determination that the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner proposes to re-issue a permit for this discharge to the Byram River.

The proposed permit, if issued by the Commissioner, will require that all wastewater be treated to meet the applicable effluent limitations with periodic monitoring to demonstrate that the discharge will not cause pollution.

APPLICANT'S PROPOSAL

Greenwich American, Inc. proposes to discharge up to an annual average daily design flow of 70,000 gallons per day of advanced treated wastewaters to the Byram River.

The name and mailing address of the permit applicant are: Greenwich American, Inc., One American Lane, Greenwich, Connecticut, 06831. The proposed activity will take place at One American Lane, Greenwich, Connecticut.

REGULATORY CONDITIONS

Type of Treatment

Advanced biological treatment with seasonal chlorine disinfection.

Effluent Limitations

This permit contains effluent limitations consistent with Secondary Treatment pursuant to Section 22a-430-4(r) of the Regulations of Connecticut State Agencies (RCSA) that meet Connecticut's Water Quality Standards.

In accordance with Section 22a-430-4(l) of the Regulations of Connecticut State Agencies the permit contains effluent limitations for the following: Biochemical Oxygen Demand (5 day), chlorine, fecal coliform, flow, pH, total suspended solids.

COMMISSIONER'S AUTHORITY

The Commissioner of Environmental Protection is authorized to approve or deny such permits pursuant to (1) Section 402(b) of the Federal Water Pollution Control Act, as amended, 33 USC 1251, et. seq. and (2) Section 22a-430 of the Connecticut General Statutes and the Water

Discharge Permit Regulations (Section 22a-430-3 and 4 of the RCSA).

INFORMATION REQUESTS

The application has been assigned the following numbers by the Department of Environmental Protection. Please use these numbers when corresponding with this office regarding this application.

APPLICATION NO. 200501538 PERMIT ID NO.CT0030295 FACILITY ID NO.057-020

Interested persons may obtain copies of the application from Steven Semelik, One American Lane, Greenwich, Connecticut, 06831. The application is available for inspection by contacting Iliana Ayala 424-3018, at the Department of Environmental Protection, Bureau of Water Management, Permitting & Enforcement Division, 79 Elm Street, Hartford, Connecticut, 06106-5127 from 8:30 - 4:30, Monday through Friday.

Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

PUBLIC COMMENT

Prior to making a final decision to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons which are received within 30 days of this public notice. Written comments should be directed to Iliana Ayala, Bureau of Water Management, Department of Environmental Protection, Planning & Standards Division, 79 Elm Street, Hartford, Connecticut, 06106-5127. The Commissioner may hold a hearing on this application if the Commissioner determines there is significant public interest in the application, and shall hold a public hearing if the Commissioner receives a petition signed by twenty-five or more persons. Notice of any public hearing shall be published at least 30 days prior to the hearing.

Dated: March 14, 2006

OSWALD INGLESE, JR.
Oswald Inglese
Director
Bureau of Water Management
Permitting and Enforcement Division