PRETREATMENT PERMIT

issued to

VANDERBILT CHEMICALS, LLC
31 Taylor Avenue
Bethel, CT 06801

Location Address:

31 Taylor Avenue
Bethel, CT

Permit ID: SP0000110

Permit Expires: DRAFT

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 a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403 (Title 40 of the Code of Federal Regulations, Part 403).

(B) VANDERBILT CHEMICALS, LLC, ("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 subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(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, penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars ($25,000) may be assessed per violation per day.

(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 of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (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) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.

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

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 sections 22a-430-3(a) and 22a-430-6 of the RCSA.

(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 discharge monitoring report ("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.

"Batch" means a finite volume of wastewater treated at one time in equalization tank one or two, not to exceed 30,000 gallons.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

"Daily Quantity" means the quantity of waste generated during an operating day.

"gpd" means gallons per day.

"gpm" means gallons per minute.

"gr/d" means grams 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.

"mg/l" means milligrams per liter.

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

"NR" as a Monitoring Table abbreviation means "not required".

"Range During Sampling" or "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 shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

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

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

"S.U." means Standard Units.

"Twice per Month", when used as a sample frequency shall mean two samples per calendar month collected no less than 12 days apart.

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S FINAL DETERMINATION

(A) The Commissioner has made a final determination and found that the continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's final determination is based on Application No. 201205909 for permit reissuance received on August 10, 2012 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's authorized agent for the discharges and/or activities authorized by , or associated with, this permit as follows:

(1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT REISSUANCE], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000110, issued by the Commissioner to the Permittee on February 8, 2008, the previous application submitted by the Permittee on April 12, 2005, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0000110, issued by the Commissioner to the Permittee on February 8, 2008.

(2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000110, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 201205909 received by the Department on August 10, 2012, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0000110, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].

(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 that may be authorized under the Federal Clean Water Act or the Connecticut General Statutes 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 Connecticut General Statutes or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(A) The discharge shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A

Discharge Serial Number: 001-1 | **Monitoring Location:** 1

Wastewater Description: Treated organic chemical manufacturing wastewaters (pretreated accelerator and brine processes wastewaters, reactor cleaning wastewater, pilot plant wastewaters, sink drainage and contaminated stormwater) and non-process wastewaters (steam condensate, cooling tower blowdown, water softener backwash, reactor jacket blowdown, air compressor condensate, boiler blowdown and chiller overflow).

Monitoring Location Description: Collection sump following the air scrubber

Discharge is to: City of Danbury Water Pollution Control Facility via the Town of Bethel Sanitary Sewer System

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency [2]	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/ Reporting Frequency [2]	Sample Type or measurement to be reported
Acenaphthene	ug/l	7.6	18.8	Semi-Annual	Daily Composite	28.2	NR	Grab
Acenaphthene	gr/d	1.15	2.84	Semi-Annual	Daily Composite	NA	NR	NA
Anthracene	ug/l	7.6	18.8	Semi-Annual	Daily Composite	28.2	NR	Grab
Anthracene	gr/d	1.15	2.84	Semi-Annual	Daily Composite	NA	NR	NA
Antimony, Total	ug/l	NA	-----	Semi-Annual	Daily Composite	NA	NR	NA
Benzene	ug/l	22.8	53.6	Semi-Annual	Grab Sample Average	80.4	NR	Grab
Benzene	gr/d	3.45	8.10	Semi-Annual	Grab Sample Average	NA	NR	NA
Biochemical Oxygen Demand, 5 day	mg/l	1,000	1,500	Twice per Month	Daily Composite	2,250	NR	Grab
Bis (2-ethythexyl) Phthalate	ug/l	38	103.2	Semi-Annual	Daily Composite	154.8	NR	Grab
Bis (2-ethythexyl) Phthalate	gr/d	5.74	15.60	Semi-Annual	Daily Composite	NA	NR	NA
Cadmium, Total	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	NA
Carbon Tetrachloride	ug/l	56.8	152	Semi-Annual	Grab Sample Average	228	NR	Grab
Carbon Tetrachloride	gr/d	8.59	22.98	Semi-Annual	Grab Sample Average	NA	NR	NA
Chemical Oxygen Demand	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	NA
Chlorobenzene	ug/l	56.8	152	Semi-Annual	Grab Sample Average	228	NR	Grab
Chlorobenzene	gr/d	8.59	22.98	Semi-Annual	Grab Sample Average	NA	NR	NA
Chloroethane	ug/l	44	118	Semi-Annual	Grab Sample Average	177	NR	Grab
Chloroethane	gr/d	6.65	17.84	Semi-Annual	Grab Sample Average	NA	NR	NA
Chloroform	ug/l	44.4	130	Semi-Annual	Grab Sample Average	195	NR	Grab
Chloroform	gr/d	6.71	19.66	Semi-Annual	Grab Sample Average	NA	NR	NA
Chromium, Hexavalent	ug/l	NA	-----	Semi-Annual	Grab Sample Average	NA	NR	NA
Chromium, Total	ug/l	NA	-----	Semi-Annual	Daily Composite	NA	NR	NA
Copper, Total	mg/l	0.5	1.0	Twice per Month	Daily Composite	1.5	NR	Grab
Cyanide, Total	ug/l	168	480	Semi-Annual	Grab Sample Average	720	NR	Grab
Cyanide, Total	gr/d	25.40	72.58	Semi-Annual	Grab Sample Average	NA	NR	NA
Di-n-butyl Phthalate	ug/l	8.0	17.2	Semi-Annual	Daily Composite	25.8	NR	Grab
Di-n-butyl Phthalate	gr/d	1.21	2.60	Semi-Annual	Daily Composite	NA	NR	NA

1,2 - Dichlorobenzene	ug/l	78.4	317.6	Semi-Annual	Daily Composite	476.4	NR	Grab
1,2 - Dichlorobenzene	gr/d	11.85	48.02	Semi-Annual	Daily Composite	NA	NR	NA
1,3 - Dichlorobenzene	ug/l	56.8	152	Semi-Annual	Daily Composite	228	NR	Grab
1,3 - Dichlorobenzene	gr/d	8.59	22.98	Semi-Annual	Daily Composite	NA	NR	NA
1,4 - Dichlorobenzene	ug/l	56.8	152	Semi-Annual	Daily Composite	228	NR	Grab
1,4 - Dichlorobenzene	gr/d	8.59	22.98	Semi-Annual	Daily Composite	NA	NR	NA
1,1 - Dichloroethane	ug/l	8.8	23.6	Semi-Annual	Grab Sample Average	35.4	NR	Grab
1,1 - Dichloroethane	gr/d	1.33	3.57	Semi-Annual	Grab Sample Average	NA	NR	NA
1,2 - Dichloroethane	ug/l	72	229.6	Semi-Annual	Grab Sample Average	344.4	NR	Grab
1,2 - Dichloroethane	gr/d	10.89	34.71	Semi-Annual	Grab Sample Average	NA	NR	NA
1,2 - Dichloropropane	ug/l	78.4	317.6	Semi-Annual	Grab Sample Average	476.4	NR	Grab
1,2 - Dichloropropane	gr/d	11.85	48.02	Semi-Annual	Grab Sample Average	NA	NR	NA
1,1 - Dichloroethylene	ug/l	8.8	24	Semi-Annual	Grab Sample Average	36	NR	Grab
1,1 - Dichloroethylene	gr/d	1.33	3.63	Semi-Annual	Grab Sample Average	NA	NR	NA
1,2 - trans-Dichloroethylene	ug/l	10.0	26.4	Semi-Annual	Grab Sample Average	39.6	NR	Grab
1,2 - trans-Dichloroethylene	gr/d	1.51	3.99	Semi-Annual	Grab Sample Average	NA	NR	NA
1,3 - Dichloropropylene	ug/l	78.4	317.6	Semi-Annual	Grab Sample Average	476.4	NR	Grab
1,3 - Dichloropropylene	gr/d	11.85	48.02	Semi-Annual	Grab Sample Average	NA	NR	NA
Diethyl Amine	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	NA
Diethyl Phthalate	ug/l	18.4	45.2	Semi-Annual	Daily Composite	67.8	NR	Grab
Diethyl Phthalate	gr/d	2.78	6.83	Semi-Annual	Daily Composite	NA	NR	NA
Dimethly Phthalate	ug/l	7.6	18.8	Semi-Annual	Daily Composite	28.2	NR	Grab
Dimethly Phthalate	gr/d	1.15	2.84	Semi-Annual	Daily Composite	NA	NR	NA
4,6 - Dinitro-o-cresol	ug/l	31.2	110.8	Semi-Annual	Daily Composite	166.2	NR	Grab
4,6 - Dinitro-o-cresol	gr/d	4.72	16.75	Semi-Annual	Daily Composite	NA	NR	NA
Ethylbenzene	ug/l	56.8	152	Semi-Annual	Daily Composite	228	NR	Grab
Ethylbenzene	gr/d	8.59	22.98	Semi-Annual	Daily Composite	NA	NR	NA
Flow, Average Daily[1]	gpd	40,000	NA	Continuous/Monthly	Daily Flow	NA	NR	NA
Flow, Maximum	gpd	NA	50,000	Continuous/Monthly	Daily Flow	NA	NR	NA
Flow, Day of Sampling	gpd	-----	50,000	Twice per Month	Daily Flow	NA	NR	NA
Flow, Instantaneous	gpm	NA	NA	NR	NA	80	Continuous/Monthly	Instantaneous
Fluoranthene	ug/l	8.8	21.6	Semi-Annual	Daily Composite	32.4	NR	Grab
Fluoranthene	gr/d	1.33	3.26	Semi-Annual	Daily Composite	NA	NR	NA
Fluorene	ug/l	7.6	18.8	Semi-Annual	Daily Composite	28.2	NR	Grab
Fluorene	gr/d	1.15	2.84	Semi-Annual	Daily Composite	NA	NR	NA
Hexachlorobenzene	ug/l	78.4	317.6	Semi-Annual	Daily Composite	476.4	NR	Grab
Hexachlorobenzene	gr/d	11.85	48.02	Semi-Annual	Daily Composite	NA	NR	NA
Hexachlorobutadiene	ug/l	56.8	152	Semi-Annual	Daily Composite	228	NR	Grab
Hexachlorobutadiene	gr/d	8.59	22.98	Semi-Annual	Daily Composite	NA	NR	NA
Hexachloroethane	ug/l	78.4	317.6	Semi-Annual	Daily Composite	476.4	NR	Grab
Hexachloroethane	gr/d	11.85	48.02	Semi-Annual	Daily Composite	NA	NR	NA

Iron, Total	ug/l	NA	-----	Semi-Annual	Daily Composite	NA	NR	NA
Lead, Total	ug/l	128	276	Twice per Month	Daily Composite	414	NR	Grab
Lead, Total	gr/d	19.35	41.73	Twice per Month	Daily Composite	NA	NR	NA
Methyl Chloride	ug/l	44	118	Semi-Annual	Grab Sample Average	177	NR	Grab
Methyl Chloride	gr/d	6.65	17.84	Semi-Annual	Grab Sample Average	NA	NR	NA
Methylene Chloride	ug/l	14.4	68	Twice per Month	Grab Sample Average	102	NR	Grab
Methylene Chloride	gr/d	2.18	10.28	Twice per Month	Grab Sample Average	NA	NR	NA
Naphthalene	ug/l	7.6	18.8	Semi-Annual	Daily Composite	28.2	NR	Grab
Naphthalene	gr/d	1.15	2.84	Semi-Annual	Daily Composite	NA	NR	NA
Nickel, Total	ug/l	NA	-----	Semi-Annual	Daily Composite	NA	NR	NA
Nitrobenzene	ug/l	894.8	2560.8	Semi-Annual	Daily Composite	3841.2	NR	Grab
Nitrobenzene	gr/d	135.3	387.2	Semi-Annual	Daily Composite	NA	NR	NA
2 - Nitrophenol	ug/l	26	92.4	Semi-Annual	Daily Composite	138.6	NR	Grab
2 - Nitrophenol	gr/d	3.93	13.97	Semi-Annual	Daily Composite	NA	NR	NA
4 - Nitrophenol	ug/l	64.8	230.4	Twice per Month	Daily Composite	345.6	NR	Grab
4 - Nitrophenol	gr/d	9.80	34.84	Twice per Month	Daily Composite	NA	NR	NA
Oil Petroleum, Total Recoverable[3]	mg/l	-----	100	Twice per Month	Grab Sample Average	150	NR	Grab
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Continuous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Continuous
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 – 10.0	Twice per Month	RDS
Phenanthrene	ug/l	7.6	18.8	Semi-Annual	Daily Composite	28.2	NR	Grab
Phenanthrene	gr/d	1.15	2.84	Semi-Annual	Daily Composite	NA	NR	NA
Phosphorus, Total (as P)	ug/l	-----	-----	Monthly	Daily Composite	NA	NR	Grab
Pyrene	ug/l	8.0	19.2	Semi-Annual	Daily Composite	28.8	NR	Grab
Pyrene	gr/d	1.21	2.90	Semi-Annual	Daily Composite	NA	NR	NA
Solids, Total Suspended	mg/l	700	1,000	Twice per Month	Daily Composite	1,500	NR	Grab
Sulfate	ug/l	-----	-----	Twice per Month	Daily Composite	NA	NR	NA
Tetrachloroethylene	ug/l	20.8	65.6	Semi-Annual	Grab Sample Average	98.4	NR	Grab
Tetrachloroethylene	gr/d	3.14	9.92	Semi-Annual	Grab Sample Average	NA	NR	NA
Toluene	ug/l	11.2	29.6	Semi-Annual	Grab Sample Average	44.4	NR	Grab
Toluene	gr/d	1.69	4.47	Semi-Annual	Grab Sample Average	NA	NR	NA
1,2,4 - Trichlorobenzene	ug/l	78.4	317.6	Semi-Annual	Daily Composite	476.4	NR	Grab
1,2,4 - Trichlorobenzene	gr/d	11.85	48.02	Semi-Annual	Daily Composite	NA	NR	NA
1,1,1 - Trichloroethane	ug/l	8.8	23.6	Semi-Annual	Grab Sample Average	35.4	NR	Grab
1,1,1 - Trichloroethane	gr/d	1.33	3.57	Semi-Annual	Grab Sample Average	NA	NR	NA
1,1,2 - Trichloroethane	ug/l	12.8	50.8	Semi-Annual	Grab Sample Average	76.2	NR	Grab
1,1,2 - Trichloroethane	gr/d	1.93	7.68	Semi-Annual	Grab Sample Average	NA	NR	NA
Trichloroethylene	ug/l	10.4	27.6	Semi-Annual	Grab Sample Average	41.4	NR	Grab
Trichloroethylene	gr/d	1.57	4.17	Semi-Annual	Grab Sample Average	NA	NR	NA
Vinyl Chloride	ug/l	38.8	68.8	Semi-Annual	Grab Sample Average	103.2	NR	Grab
Vinyl Chloride	gr/d	5.87	10.40	Semi-Annual	Grab Sample Average	NA	NR	NA

Zinc, Total	ug/l	420	1044	Sami-Annual	Daily Composite	1566	NR	Grab
Zinc, Total	gr/d	63.5	157.8	Semi-Annual	Daily Composite	NA	NR	NA

Table Footnotes and Remarks:

Footnotes:

[1] For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each sampling month.

[2] The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.

[3] Previously, oil petroleum, total recoverable, was generally referred to as oil and grease, hydrocarbon fraction.

(B) All samples shall be comprised of only those wastewaters described in this schedule. Therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.

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

SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

(A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 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.

(B) All metals analyses identified in this permit shall refer to analyses for total recoverable metal as defined in 40 CFR 136 unless otherwise specified.

(C) The results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Water Permitting and Enforcement Division at the address below. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at the address below by the last day of the month following the month in which samples are taken.

Water Permitting and Enforcement Division (Attn: DMR Processing)
Bureau of Materials Management and Compliance Assurance
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

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

(E) NetDMR Reporting Requirements

1. Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection. Unless otherwise approved in writing by the Commissioner, no later than one-hundred and eighty (180) days after the issuance of this permit, the Permittee shall begin reporting electronically using NetDMR. Specific requirements regarding subscription to NetDMR, and submittal of data and reports in hard copy form and for submittal using NetDMR are described below:

   a. Submittal of *NetDMR Subscriber Agreement*

      On or before fifteen (15) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's DMRs ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of DMR information. Information on NetDMR is available on the Department's website at www.ct.gov/deep/netdmr. On or before ninety (90) days after issuance of this permit, the Permittee shall submit a signed and notarized copy of the ***Connecticut DEEP NetDMR Subscriber Agreement*** to the Department.

   b. Submittal of Reports Using NetDMR

Unless otherwise approved by the Commissioner, on or before one-hundred and eighty (180) days after issuance of this permit, the Permittee and/or the Signatory Authority shall begin electronically submitting DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement of Section 5(C) of this permit.

DMRs shall be submitted electronically to the Department no later than the thirtieth (30th) day of the month following the completed reporting period. All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs or other reports to the Department. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR. NetDMR is accessed from: http://www.epa.gov/netdmr.

c. Submittal of NetDMR Opt-Out Requests

If the Permittee is able to demonstrate a reasonable basis, such as technical or administrative infeasibility, that precludes the use of NetDMR for electronically submitting DMRs and reports, the Commissioner may approve the submission of DMRs and other required reports in hard copy form ("opt-out request"). Opt-out requests must be submitted in writing to the Department for written approval on or before fifteen (15) days prior to the date the Permittee would be required under this permit to begin filing DMRs and other reports using NetDMR. This demonstration shall be valid for twelve (12) months from the date of the Department's approval and shall thereupon expire. At such time, DMRs and reports shall be submitted electronically to the Department using NetDMR unless the Permittee submits a renewed opt-out request and such request is approved by the Department.

All opt-out requests and requests for the NetDMR subscriber form should be sent to the following address or by email at deep.netdmr@ct.gov:

Attn: NetDMR Coordinator
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

(F) Copies of all DMRs shall be submitted concurrently to the Danbury Publicly Owned Treatment Works ("POTW") and the Bethel Public Works Department ("PWD").

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

(A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Water Permitting and Enforcement Division (Attn: DMR Processing) within thirty (30) days of the exceedance.

(B) The Permittee shall immediately notify the Water Permitting and Enforcement Division, the Danbury POTW and the Bethel PWD of all discharges that could cause problems to the POTW, including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.

(C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

SECTION 7: COMPLIANCE CONDITIONS

In accordance with 40 CFR 403.8(f)(2)(viii), the Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve (12) months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee that is a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six (66%) percent or more of all measurements taken for the same pollutant parameter during a six (6) month period exceed (by any magnitude) the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s).

- **Technical Review Criteria violations:** Those in which thirty-three (33%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period equal or exceed the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s) multiplied by 1.4 for biochemical oxygen demand, total suspended solids or fats, oil and grease, or 1.2 for all other pollutants except pH.

- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.

- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction or attaining final compliance.

- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.

- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.

- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.

- **Best Management Practices ("BMPs"):** Any other violation or group of violations, which may include failure to implement and follow BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

DRAFT
Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

MM/EMW

cc: Danbury POTW
Bethel PWD

FACT SHEET

WPED PRETREATMENT PERMIT REISSUANCE

APPLICANT	*VANDERBILT CHEMICALS, LLC*
PERMIT NO.	*SP0000110*
APPLICATION NO.	*201205909*
DATE APPLICATION RECEIVED	*August 10, 2012*
FACILITY ID.	*009-005*
LOCATION ADDRESS	*31 Taylor Avenue, Bethel, CT*
FACILITY CONTACT	*Drew Wagner, (203) 744-3900, ext. 202* *dwagner@rtvanderbilt.com*
MAILING ADDRESS	*31 Taylor Avenue, Bethel, CT 06801*
DMR CONTACT	*Drew Wagner*
PERMIT TERM	*5 Years*
PERMIT CATEGORY	*PRETREAT SIGNIFICANT INDUSTRIAL USER (SIU)* *PRETREAT CATEGORICAL (CIU)*
SIC CODE(S)	*2869, 2899*
PERMIT TYPE	*Reissuance*
OWNERSHIP	*Private*
POTW THAT RECEIVES THE DISCHARGE	*Discharge to the City of Danbury POTW via the Town of Bethel sanitary sewer system.*
DEEP STAFF ENGINEER	*Ewa Wozniak*
TENTATIVE DECISION FACT SHEET DATE	*September 4, 2014*

PERMIT FEES

***Application Filing Fee**: $1,300.00*
***Application Processing Fee**: $11,112.50*

***Annual Fee:** $9,335.00*

DISCHARGE CODE	WASTEWATER CATEGORY (per 22a-430-7)	MAXIMUM GPD or CATEGORY	DSN	ANNUAL FEE (per 22a-430-7)
501042Y	*Organic Chemical Manufacturing*	50,000	001-1	$4,337.50
5170000	*Blowdown from Heating and Cooling*		001-1	$4,337.50
5060000	*Water Production Wastewater*		001-1	$660.00
TOTAL				**$9,335.00**

I. APPLICANT

VANDERBILT CHEMICALS, LLC ("VANDERBILT") in Bethel is seeking to renew its SPDES permit (Permit No. SP 0000110 issued on February 8, 2008) for authorization of the discharge of treated wastewater associated with its organic manufacturing operations. On August 10, 2012, the Department of Energy and

Environmental Protection ("Department") received an application (Application No. 201205909) for the subject SPDES permit renewal. In a letter dated October 4, 2012, VANDERBILT was informed that its permit renewal application (Application No. 201205909) was insufficient. On November 7, 2012, the application was determined to be administratively sufficient.

NATURE OF THE BUSINESS GENERATING THE DISCHARGE

VANDERBILT is a specialty organic manufacturing company that primarily makes oil additives.

The applicant seeks authorization for the following:

DSN	PROPOSED AVERAGE MONTHLY FLOW (gpd)	PROPOSED MAXIMUM DAILY FLOW (gpd)	PROPOSED WASTESTREAMS	TREATMENT TYPE	DISCHARGE TO
001-1	40,000	50,000	*Treated organic chemical manufacturing wastewaters (consisting of accelerator and brine wastewaters, reactor cleaning wastewater, pilot plant wastewaters, sink drainage, and contaminated stormwater) and non-process wastewaters (steam condensate, cooling tower blowdown, water softener backwash, reactor jacket blowdown, air compressor condensate, boiler blowdown, and chiller overflow).*	Equalization, neutralization, bag filtration and air stripping	City of Danbury POTW via the Town of Bethel sanitary sewer system

II. RECEIVING BODY INFORMATION

FOR SEWER DISCHARGES

Discharge to the City of Danbury POTW via the Town of Bethel sanitary sewer system.

III. BACKGROUND/PERMIT HISTORY

Compliance/Enforcement

Is the Permittee subject to an ongoing enforcement action? ☐ Yes ☑ No
If yes, provide a brief explanation; include discussions of any issues relevant to the activities regulated under the permit.

Does the Permit contain a compliance schedule? ☐ Yes ☑ No
If yes, please check all that apply.

☐ Pollution Prevention ☐ Water Conservation ☐ Remediation
☐ Water Quality Requirement ☐ Treatment Requirement ☐ Other

Effluent Violations

VANDERBILT has had no violations in the past five years.

Modifications

Within the last five years, have there been any permit modifications? ☐ Yes ☑ No

VANDERBILT, in its permit renewal application (Application No. 201205909), expressed its desire to treat two additional waste streams in its on-site wastewater treatment system: Vanlube 7723 "acid wash" wastewater and distillate from the Molyvan 855 process. However, in an e-mail dated June 21, 2014, the company withdrew its proposal of treating the Vanlube 7723 "acid wash" and distillate from Molyvan 855 process in its on-site wastewater pretreatment system.

Other

N/A

IV. THE ON-SITE WASTEWATER TREATMENT SYSTEM

Three separate wastewater treatment operations make up VANDERBILT's wastewater treatment system. These include the Vanlube 7723 ("Brine") process wastewater pretreatment system, the accelerator process wastewater pretreatment system and the main treatment system (which receives the discharge from the Vanlube 7723 and accelerator pretreatment systems, as well as wastewater generated from other process operations).

Wastewaters produced by the Vanlube 7723 acid wash and the butyl tuads processes are collected and hauled off-site for disposal.

Accelerator Process Wastewater Pretreatment System

Wastewaters generated from the accelerator process are discharged to a 400 gallon stainless steel collection tank. An air diaphragm pump is then used to transfer the contents of the collection tank to a 7.9 ft^3 capacity filter press. The filter cake is removed approximately once every two weeks and placed in 55-gallon drums for off-site disposal. The filtrate from the filter press is stored in one of two storage tanks. Each tank is constructed of cross-linked polyethylene and has a volume of 6,200 gallons. Depending on the product produced when the wastewater is generated, sodium hydrosulfite may be added directly to the tanks in order to precipitate tellurium.

A pneumatically operated pump is used to discharge the contents of either holding tank to bag filters prior to discharge to the main collection sump of the main wastewater treatment system.

Vanlube 7723 ("Brine") Process Wastewater Pretreatment System

The Vanlube 7723 production process generates approximately 2,000 gallons of process wastewater per day. Process wastewater is pumped into one of two polypropylene 2,250 gallon brine holding tanks (North or South Brine Holding Tank). The bulk of the wastewater is pumped to the South tank. The flow is automatically diverted to the North tank when the level in the South tank hits the high level setpoint. Hydrogen peroxide is added to the North and South tanks after which the wastewater is circulated through a heat exchanger to reduce its temperature.

An air diaphragm pump is used to transfer the contents of either the North or South Brine Holding Tank to the 2,500 gallon polypropylene East Brine Holding Tank after oxidation of sulfides to sulfates takes place. The East Brine Holding Tank also serves as the air stripper feed tank.

Two air strippers in series have been installed to remove methylene chloride from the wastewater. Each air stripper is designed for 6 – 30 gallons per minute liquid flow rate. The vent stream from each air stripper is routed to two carbon filters in series to remove the methylene chloride from the exhaust air before it is released to the atmosphere.

Wastewater from the air stripper is pumped to the 2,500 gallon polypropylene West Brine Holding Tank. From the West Brine Holding Tank, the wastewater is pumped to the main wastewater collection sump pump station.

Main Wastewater Treatment System

The main wastewater treatment system comprises two, tile-lined, reinforced concrete 30,000 gallon equalization tanks, a basket filter and an air stripper. Pretreated wastewaters from the both the accelerator process and the Vanlube 7723 process, and wastewaters from non-process activities (e.g., cooling tower blowdown, reactor cleaning wastewater) collect in the main wastewater collection sump. From the sump, the wastewater is pumped to one of two equalization tanks where chemicals such as sodium hydroxide or sulfuric acid are manually added to get the pH within 7 – 9 S.U. Once the pH is within permit limits, the neutralized wastewater is pumped through a basket filter to remove any suspended solids present in the wastewater. The wastewater then proceeds through the air stripper to the Danbury POTW.

V. SPILL HISTORY

There have been no spills at the facility within the last five years.

VI. EFFLUENT GUIDELINES

VANDERBILT is an organic chemical manufacturing facility, specializing in the manufacture of rubber accelerators, rubber and plastic stabilizers, oil additives, anti-corrosion agents and antioxidants. 40 CFR Part 414 Subpart H (Organic Chemicals, Plastics, and Synthetic Fibers Point Source Category, Specialty Organic Chemicals) and its requirements are applicable to this discharge.

VII. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		REGULATION	DISCHARGE POINT(S)
☒	Federal Effluent Limitation Guideline (ELG)	40 CFR Part 403 – General Pretreatment Regulations for Existing and New Sources of Pollution	DSN 001-1
☒	Pretreatment Standards for Existing Sources (PSES)	40 CFR 414.85	DSN 001-1
☐	Pretreatment Standards for New Sources (PSNS)		
☐	Performance Standards		
☐	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies		
☒	Case-by-Case Determination using Best Professional Judgment (BPJ)		DSN 001-1
☐	Other (i.e. Department File Information, Treatability Manual, Federal Development Document)		

A. MONITORING PARAMETERS & LIMITS:

DSN 001-1:

- 40 CFR 414.85 requires compliance with 40 CFR 403 and 40 CFR 414.111 (Toxic pollutant standards for indirect discharge point sources). Staff used 40 CFR 414.111 to develop a list of parameters for which limits (average monthly and maximum daily) and monitoring requirements must be included in the permit. The maximum instantaneous limit for each of these parameters was derived by multiplying the maximum daily limit by 1.5.

- The permit renewal application identified the following non-process wastewaters contributing to DSN 001-1: steam condensate, cooling tower blowdown, water softener backwash, reactor jacket blowdown, air compressor condensate, boiler blowdown, and chiller overflow. These non-process wastewaters contribute approximately 60% dilution to the organic chemical manufacturing wastewaters at the sampling location. Therefore, the Department used the calculations prescribed by 40 CFR 403.6(e)(1)(i) – Alternative Concentration Limit, to calculate new limits for the parameters listed in Table A of the permit.

Comments on specific parameters:

- The pH limits of 6.0 to 10.0 S.U. from the previous permit will be retained. These limits are considered to be protective of sanitary sewer systems.

- Monitoring for the following parameters is retained from the previous permit: total antimony, total cadmium, chemical oxygen demand, diethyl amine, hexavalent chromium, total chromium, total iron, total nickel and sulfate. Sample analyses have indicated that these pollutants are present in the discharge. Monitoring for the above listed parameter is based on a case-by-case determination using BPJ.

- Average monthly, maximum daily and maximum instantaneous limits for biochemical oxygen demand (5 day) and total suspended solids are being incorporated in this permit reissuance as a result of a request by the Danbury POTW. These limits are based on the Danbury sewer ordinances.

- Monitoring for total phosphorus (as P) is being incorporated in this permit reissuance as a result of a request by the Danbury POTW. The Danbury POTW is in the process of determining the potential sources of total phosphorus that are contributing wastewater to its facility.

- Limits for total copper are retained from the previous permit to protect the receiving POTW. These limits are based on a case-by-case determination using BPJ.

- The previous permit included monitoring requirements for oil and grease, hydrocarbon fraction, which is now identified as oil petroleum, total recoverable. In addition, the Department incorporated maximum daily and maximum instantaneous limits of 100 mg/l and 150 mg/l, respectively, during this permit reissuance at the request of the Danbury POTW.

B. MONITORING FREQUENCY:

The *Monitoring Schedule* set forth in section 22a-430-3 of the RCSA prescribes a minimum frequency of monitoring, based on the category of the wastewater discharge and the permitted average daily flow (in gallons per day ("gpd")). Since VANDERBILT's permitted average daily flow, for DSN 001-1, is 40,000 gpd and the wastewaters are generated from organic chemicals manufacturing, staff determined that the discharge falls in the "y" subcategory (5,000 – 50,000 gpd) of the "Organic Chemicals Manufacturing" category of discharge. Therefore, the parameters that are expected to be found in VANDERBILT's organic chemicals manufacturing process wastewaters will be monitored twice per month. These parameters are: biochemical oxygen demand 5-day, total cadmium, chemical oxygen demand, total copper, diethyl amine, total lead, methylene chloride, 4-Nitrophenol, oil and grease (total recoverable), total suspended solids, and sulfate.

Monitoring frequency for the rest of the parameters listed in Table A of the permit has been determined on a case-by-case basis using BPJ.

VIII. MISCELLANEOUS

VANDERBILT is subject to the terms and conditions of the following general permit:

- General Permit for the Discharge of Stormwater Associated with Industrial Activity (GSI000807)

IX. SITE & RESOURCE INFORMATION

A. INDIAN LAND

Based on the information provided in the permit application, the site is not located on federally-recognized Indian land.

B. COASTAL BOUNDARY

The subject site is not located within the coastal boundary as delineated on Department approved coastal boundary maps.

C. ENDANGERED OR THREATENED SPECIES

The subject site is not located within an area identified as a habitat for endangered, threatened or special concern species as identified on the "State and Federal Listed Species and Natural Communities Map."

D. AQUIFER PROTECTION AREAS

The subject site is not located within a town that is required to establish Aquifer Protection Areas.

E. CONSERVATION OR PRESERVATION RESTRICTION

The property on which the subject site is located is not subject to a conservation or preservation restriction.

F. MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

The application does not include stormwater discharges to a MS4.

G. PUBLIC WATER SUPPLY WATERSHED

The subject site is not located within a public water supply watershed.

X. COMMENTS RELATED TO THE PUBLIC NOTICE

Notice of Tentative Decision was published in ____ on ___. The comment period ended on _____. The Department has received [no] [the following] written comments on the proposed action: Pick the one that applies.

Comments If Any

The Bureau of Materials Management and Compliance Assurance staff has reviewed the written comments and does not feel that the tentative determination should be modified. Provide Reasons

The Bureau of Materials Management and Compliance Assurance staff has reviewed the written comments and recommends the following changes in the [tentative determination] [draft permit]. Pick the one that applies.

(NOTE: Staff needs to ensure that the language in this section matches what is in the Final Determination Memo)

If there is a15 Day Notice – provide the date it was signed.

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

**NOTICE OF TENTATIVE DECISION OF
INTENT TO RENEW A STATE PERMIT
FOR THE FOLLOWING DISCHARGE
INTO THE WATERS OF THE STATE OF CONNECTICUT**

TENTATIVE DECISION

The Commissioner of Energy and Environmental Protection ('the Commissioner") hereby gives notice of a tentative decision to renew a permit based on an application submitted by **VANDERBILT CHEMICALS, LLC** ("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 decision that continuance of the existing system to treat the discharge would protect the waters of the state from pollution and the Commissioner proposes to renew a permit for the discharge to the Danbury Water Pollution Control Facility ("WPCF") via the sanitary sewer system in the town of Bethel.

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

APPLICANT'S PROPOSAL

VANDERBILT CHEMICALS, LLC proposes to continue discharging up to a maximum of 50,000 gallons per day of pretreated organic chemical manufacturing and non-process wastewaters from organic chemical manufacturing operations to the Danbury WPCF.

The name and mailing address of the permit applicant are: VANDERBILT CHEMICALS, LLC, 31 Taylor Avenue, Bethel, CT 06801.

The activity takes place at: 31 Taylor Avenue, Bethel, CT.

REGULATORY CONDITIONS

Type of Treatment

DSN 001-1: Accelerator and brine wastewaters are treated prior to combination with pilot plant wastewaters, sink drainage, contaminated stormwater and non-process wastewaters for final treatment. Treatment of accelerator wastewaters consists of product removal, equalization/sodium hydrosulfite addition and bag filtration. Treatment of brine wastewaters consists of addition of hydrogen peroxide for sulfide oxidation, heat reduction via a heat exchanger and air stripping. Treatment of the combined discharge consists of equalization, neutralization, bag filtration and air stripping.

Effluent Limitations

This permit contains effluent limitations consistent with a Case-by-Case Determination using the criteria of Best Professional Judgement, Pretreatment Standards for New Sources (PSNS) and section 22a-430-4(s) of the Regulations of Connecticut State Agencies, and which will protect the waters of the state from pollution when all the conditions of this permit have been met.

In accordance with section 22a-430-4(l) of the Regulations of Connecticut State Agencies the permit contains effluent limitations for the following types of toxic substances: heavy metals, volatile organic compounds, acid organic compounds and base/neutral organic compounds.

COMMISSIONER'S AUTHORITY

The Commissioner is authorized to approve or deny such permits pursuant to section 22a-430 of the Connecticut General Statutes and the Water Discharge Permit Regulations (sections 22a-430-3 and 4 of the Regulations of Connecticut State Agencies).

INFORMATION REQUESTS

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

APPLICATION NO. 201205909 PERMIT ID NO. SP0000110

Interested persons may obtain copies of the application from Drew Wagner, VANDERBILT CHEMICALS, LLC, 31 Taylor Avenue, Bethel, CT 06801, (203) 744-3900 ext. 202.

The application is available for inspection by contacting Ewa Wozniak (860) 424-3025, at the Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 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 determination to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within thirty (30) days of this public notice. Written comments should be directed to Ewa Wozniak, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby, and shall hold a hearing upon receipt of a petition signed by at least twenty-five (25) persons. Notice of any public hearing shall be published at least thirty (30) days prior to the hearing.

Petitions for a hearing should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. Original petitions must be *mailed or delivered* to: DEEP Office of Adjudications, 79 Elm Street, 3rd floor, Hartford, CT, 06106-5127. Petitions cannot be sent by fax or email. Additional information can be found at www.ct.gov/deep/adjudications.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action and Equal Opportunity Employer that is committed to complying with the Americans with Disabilities Act. To request an accommodation contact us at (860) 418-5910 or deep.accommodations@ct.gov.

Oswald Inglese, Jr.
Director
Water Permitting and Enforcement Division
Bureau of Materials Management and Compliance Assurance

Dated: NOV 26 2014