STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NPDES PERMIT

issued to

Atlantic Wire Company LLC
One Church Street
Branford, CT 06405

Location Address:

One Church Street
Branford, CT 06405

Facility ID: 014-013

Permit ID: CT0000159

Receiving Stream: Branford River

Permit Expires: December 7, 2010

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) Atlantic Wire Company 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 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

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(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

"Annual" in the context of any sampling frequency found in Section 5, shall mean the sample must be collected in the month of February.

"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.

"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 discharged during an operating day.

"g/day" 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.

"In stream Waste Concentration (IWC)" means the concentration of a discharge in the receiving water after mixing has occurred in the allocated zone of influence.

"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".

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

"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 greater than 50% survival of test organisms in 100% (undiluted) effluent and 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 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.

"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.

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

"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 DECISION

(A) The Commissioner of Environmental Protection ("Commissioner"), has issued a final determination and found that continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's decision is based on application #200401068 for permit reissuance received on April 1, 2004 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 his 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°F, or, in any case, raise the normal temperature of the receiving stream more than 4°F.

SECTION 5: SPECIFIC 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 tables below:

Table A

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

Wastewater Description: Treated Metal Finishing Wastewater

Monitoring Location Description: Final effluent monitoring tank

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test
		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	
Aluminum, Total	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	*
Cadmium, Total	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	*
Chlorine, Total Residual	mg/l	NA	NA	NR	NA	0.175	Monthly	Grab	*
Copper, Total	mg/l	1.0	2.0	Weekly//Monthly	Daily Composite	3.0	NR	NA	*
Copper, Total	g/day	15.5	31.4	Weekly//Monthly	Daily Composite	NA	NR	NA	
Chromium, Total	mg/l	1.0	2.0	Quarterly	Daily Composite	3.0	NR	NA	*
Cyanide, Total	mg/l	0.65	1.2	Annual	Grab Sample Average	1.8	NR	NA	
Flow, Average and Maximum [1]	gpd	60,000	111,000	Daily//Monthly	Daily Flow	NA	NR	NA	
Flow, Total	gpd	60,000	111,000	Weekly//Monthly	Daily Flow	NA	NR	NA	
Hours of Discharge	hr.	NA	-----	Weekly//Monthly	Total hours	NA	NR	NA	
Iron, Total	mg/l	2.0	5.0	Weekly//Monthly	Daily Composite	7.5	NR	NA	
Lead, Total	mg/l	.10	.50	Quarterly	Daily Composite	0.75	NR	NA	*
Nickel, Total	mg/l	1.0	2.0	Weekly//Monthly	Daily Composite	3.0	NR	NA	*
Nickel, Total	g/day	43.90	88.10	Weekly//Monthly	Daily Composite	NA	NR	NA	*
Nitrate, Nitrogen	mg/l	NA	------	Quarterly	Daily Composite	NA	NR	NA	
Nitrite, Nitrogen	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Nitrogen, Ammonia (Total as N)	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Oil & Grease, Total	mg/l	10.0	20.0	Monthly	Grab Sample Average	20.0	NR	NA	

pH	S.U.	NA	NA	NR	NA	6.0 - 9.0	Weekly// Monthly	RDS	
pH, Continuous	S.U.	NA	NA	NR	NA	6.0 - 9.0	Continuous	RDM	
Silver, Total	mg/l	.10	.430	Annual	Daily Composite	0.645	NR	NA	*
Tin, Total	mg/l	1.0	2.0	Weekly//Monthly	Daily Composite	3.0	NR	NA	
Total Dissolved Solids	mg/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Total Suspended Solids	mg/l	20.0	30.0	Weekly//Monthly	Daily Composite	45.0	NR	NA	
Total Toxic Organics (TTOs) (see section 8 paragraph D below)	mg/l	NA	NA	NR	NA	1.42	Monthly	Grab	
Zinc, Total	mg/l	1.0	2.0	Weekly//Monthly	Daily Composite	3.0	NR	NA	*
Zinc, Total	g/day	291.0	584.0	Weekly//Monthly	Daily Composite	NR	NR	NA	*

Table Footnotes and Remarks:

Footnotes:

[1] 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 Average Daily Flow and the Maximum Daily Flow for each month.

[2] The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry 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] Minimum Level Test refers to Section Paragraph of this permit.

TABLE B						
Discharge Serial Number (DSN):001-1			Monitoring Location: T			
Wastewater Description: Treated Metal Finishing Wastewater						
Monitoring Location Description: Final effluent monitoring tank						
Allocated Zone of Influence (ZOI): 68,850 gph				In stream Waste Concentration (IWC): 3.5%		
PARAMETER	**Units**	**Maximum Daily Limit**	**Maximum Instantaneous Limit**	**Sampling Frequency**	**Sample Type**	**Minimum Level Analysis See Section 6**
Aquatic Toxicity, Mysidopsis Bahia [1]	%	LC50 > 70%	LC50>23%	Quarterly	Daily Composite	
Aquatic Toxicity, Cyprinodon Variega [1]	%	LC50 > 70%	LC50>23%	Quarterly	Daily Composite	
Aluminum, Total	mg/l	-----	NA	Quarterly	Daily Composite	*
Boron, Total	mg/l	-----	NA	Quarterly	Daily Composite	
Cadmium, Total	mg/l	-----	NA	Quarterly	Daily Composite	*
Chromium, Total	mg/l	2.0	NA	Quarterly	Daily Composite	*
Chlorine, Total Residual	mg/l	------	NA	Quarterly	Daily Composite	*
Copper, Total	mg/l	2.0	NA	Quarterly	Daily Composite	*
Iron, Total	mg/l	5.0	NA	Quarterly	Daily Composite	
Lead, Total	mg/l	.50	NA	Quarterly	Daily Composite	*
Manganese, Total	mg/l	------	NA	Quarterly	Daily Composite	
Nickel, Total	mg/l	------	NA	Quarterly	Daily Composite	*
Nitrogen, Ammonia (total as N)	mg/l	------	NA	Quarterly	Daily Composite	
Nitrate	mg/l	-----	NA	Quarterly	Daily Composite	
Nitrite	mg/l	-----	NA	Quarterly	Daily Composite	
Solids, Total Dissolved	mg/l	-----	NA	Quarterly	Daily Composite	
Solids, Total Suspended	mg/l	30.0	NA	Quarterly	Daily Composite	

TABLE B						
Discharge Serial Number (DSN):001-1			Monitoring Location: T			
Wastewater Description: Treated Metal Finishing Wastewater						
Monitoring Location Description: Final effluent monitoring tank						
Allocated Zone of Influence (ZOI): 68,850 gph				In stream Waste Concentration (IWC): 3.5%		
PARAMETER	**Units**	**Maximum Daily Limit**	**Maximum Instantaneous Limit**	**Sampling Frequency**	**Sample Type**	**Minimum Level Analysis See Section 6**
Surfactants	mg/l	-----	NA	Quarterly	Daily Composite	
Tin, Total	mg/l	2.0	NA	Quarterly	Daily Composite	
Zinc, Total	mg/l	2.0	NA	Quarterly	Daily Composite	*
Remarks: Note: All analysis shall be on the same sample. [1] For DMR reporting purposes, the Permittee shall report only pass/fail on the DMR.						

(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.

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(s) A and 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
Aluminum	10.0 ug/L
Cadmium	0.5 ug/L
Chlorine, total residual	20.0 ug/L
Chromium	5.0 ug/L
Copper	5.0 ug/L
Lead	5.0 ug/L
Nickel	5.0 ug/L
Silver	2.0 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 samples shall be chilled as they are collected. Grab samples shall be chilled immediately following collection. Samples shall be held at 0 - 6 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 Table B shall be conducted on an aliquot of the same sample tested for Aquatic Toxicity.

(i) At a minimum, pH, specific conductance, salinity, 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 24 hour intervals until test termination.

(ii) For tests with saltwater organisms that require salinity adjustment of the effluent, chemical analyses shall be conducted on an aliquot of the effluent sample collected for Aquatic Toxicity testing and on an aliquot of the effluent following salinity adjustment. Both sets of results shall be reported on the Aquatic Toxicity Monitoring Report (ATMR). Salinity adjustment effluent shall be tested for Total Suspended Solids, (TSS), boron, copper, iron, manganese, zinc, nitrate and nitrite.

(d) Tests for Aquatic Toxicity shall be initiated within 36 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 Mysidopsis bahia (1-5 days old with no more than 24-hours range in age)

(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 Cyprinodon variegatus (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 of 33% or greater: 100%, 75%, 50%, 25%, 12.5%, and 6.25%

(b) Mysidopsis bahia may be fed during tests.

(c) Aquatic toxicity tests with saltwater organisms shall be conducted at a salinity of 20, plus or minus 2 parts per thousand.

(i) Sodium lauryl sulfate or sodium dodecyl sulfate shall be used as the reference toxicant.

(ii) Synthetic seawater for use as dilution water or controls shall be prepared with deionized water and artificial sea salts as described in EPA/821-R-02-012.

(iii) If the salinity of the test water is more that 5 parts per thousand higher, or lower than the culture water used for rearing the organisms, a second set of controls matching the salinity of the culture water shall be added to the test series. Test validity shall be determined using the controls adjusted to match the source water salinity.

(iv) Salinity adjustment that may be required in tests with saltwater organisms shall utilize the minimum amount of synthetic salts or necessary to achieve the required salinity.

(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: LIMITATIONS FOR AQUATIC TOXICITY BASED ON ACTUAL FLOWS

(A) In lieu of demonstrating compliance with the specific Maximum Daily Toxicity Limits in Section 5 Table B the Permittee may recalculate the In stream Waste Concentration (IWC) based on actual flows provided:

(1) the Permittee maintains an accurate record of measured discharge flows and hours of operation for all days on which a discharge occurs; and

(2) the total daily flow for any single operating day does not exceed the average of the daily flows for the thirty consecutive operating days prior to the sampling date by more than 25 per cent.

(B) The IWC shall be calculated as follows:

(1) The measured average daily flow in gallons per hour shall be tabulated for each of the prior 30 operating days and the arithmetic average for the 30 day period calculated.

(2) The IWC (in gallons per hour) specific for the thirty consecutive operating days prior to the sampling date shall be calculated by dividing the 30 day average hourly flow by the sum of the 30-day average flow and the zone of influence (ZOI) allocated to the discharge:

$$\text{IWC (\%)} = \frac{\text{30 day average hourly flow}}{\text{30 day average hourly flow + ZOI}} \times 100$$

(3) The alternative Maximum Daily Toxicity Limit shall be determined by the IWC calculated above:

(a) For IWC equal to or less than 5%, the LC50 value shall be greater than or equal to the IWC times 20.

(b) For IWC greater than 5%, and less than 15%, the NOAEL value shall be an NOAEL equal to the IWC times 6.7.

(c) For IWC equal to or greater than 15%, the NOAEL value shall be an NOAEL equal to 100%.

(d) Demonstration of compliance with these alternative Maximum Daily Limits shall be performed as specified in Section 6(B) of this permit.

(C) Compliance with the alternative Maximum Daily Toxicity Limits based on actual flows shall be determined as follows:

(1) For alternative limits expressed as a Minimum LC50 value in accordance with Section (7)(B)(3)(a) above, compliance shall be demonstrated when the LC50 value for a valid definitive Aquatic Toxicity Test, conducted pursuant to the requirements specified in section (6)(B) of this permit, is greater than the alternative limit.

(2) For alternative limits expressed as an NOAEL value in accordance with Section (7)(B)(3)(b) above, compliance shall be demonstrated when the results of a valid pass/fail Aquatic Toxicity Test, conducted pursuant to the requirements specified in section (6)(B) of this permit, indicates greater than 50% survival in the undiluted effluent and 90% or greater survival in the effluent at a CTC equal to the alternative limit.

SECTION 8: 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 and 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) and sent to the Bureau of Water Management at the following address. 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 St.
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.

(D) For any table above that requires Total Toxic Organics (TTO) monitoring, the Permittee may, in lieu of analyzing for Total Toxic Organics, include a statement on the DMR, at the frequency required, certifying compliance with your Solvent Management Plan if such plan has been approved by the Commissioner in accordance with 22a-430-4(l) of the RCSA and by 40CFR433 (Metal Finishing). If such approval has been granted and the reports include the compliance statement, sampling for Total Toxic Organics is no longer a requirement of this permit.

SECTION 9: 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 the 12/8/05

Gina McCarthy
Commissioner

RM/CN

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Atlantic Wire Company LLC PAMS Company ID: 115493

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0000159 APPLICATION #: 200401068 FACILITY ID. 014-013

Mailing Address:						**Location Address:**					
Street:	One Church Street					**Street:**	One Church Street				
City:	Branford	**ST:**	CT	**Zip:**	06405	**City:**	Branford	**ST:**	**CT**	**Zip:**	06405
Contact Name:	Bob Meyer					**DMR Contact**	Bob Meyer				
Phone No.:	(203) 488-8331					**Phone No.:**	(203) 488-8331				

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) _x____
NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) _____
NPDES or PRETREATMENT MINOR (MI) _____

PRETREAT SIGNIFICANT INDUS USER (SIU) _____
PRETREAT CATEGORICAL (CIU) _____

POLLUTION PREVENTION MANDATE _ ENVIRONMENTAL EQUITY ISSUE ____

Is the permittee subject to a pending enforcement action? ***NO X YES***___

POLLUTION PREVENTION __ TREATMENT REQUIREMENT__ WATER CONSERVATION_____

WATER QUALITY REQUIREMENT __ REMEDIATION __ OTHER _____

OWNERSHIP CODE

Private _x_ Federal __ State __ Municipal (town only) __ Other public ____

DEP STAFF ENGINEER Charles Nezianya

PERMIT FEES

Discharge Code	DSN Number	Annual Fee
101035z	001	$8,175.00

FOR NPDES DISCHARGES

Drainage basin Code: 5111 Present/Future Water Quality Standard: S/B

FOR SEWER DISCHARGES NA

~~Discharge to The Regional Authority/Town/City of _____ POTW via Truck/Town of ___/its collection system. Facility ID of the POTW is _____.~~

FOR UIC PERMITS

Drainage basin Code: n/a Water Quality Standard: n/a Total Wells __ Well Type _____

NATURE OF BUSINESS GENERATING DISCHARGE

Acid cleaning and coating of various steel rod, wire alloys and floor spills.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

Neutralization, Flocculation, Clarification and Sludge Dewatering

RESOURCES USED TO DRAFT PERMIT

_x_ Federal Effluent Limitation Guideline_40CFR433
Metal finishing 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 Best Available Technology (BAT) (DSN 001 - silver)

x Best Professional Judgment (See Other Comments) (DSN 001 - tin)

x Case-by-Case Determination (See Other Comments) (DSN 001 - tin)

x Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (DSN 001 - copper, chromium, cyanide, lead, nickel, oil and grease, silver, TSS and zinc)

x In order to meet in-stream water quality (See General Comments) (DSN 001 - TRC)

GENERAL COMMENTS

In developing the permit's concentration limits, EPA Metal Finishing Categorical Limits (40 CFR Part 433) and Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies limits were compared. The Connecticut limits were found to be more stringent and thus incorporated in the permit, except for silver.

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 mass limit in addition to the BAT concentration limit.

OTHER COMMENTS

Atlantic Wire Company LLC manufactures coated and uncoated steel wire. This NPDES permit is to renew the permit, which was issued on September 27, 1999 and expired on September 27, 2004. Based on a review of Atlantic's Discharge Monitoring Reports (DMRs) for the last five years, they can comply with the toxicity limit at the 60,000 gallons per day average monthly flow limit. Atlantic had some historical problems with meeting their aquatic toxicity limits because of their flow variability, which required the limit to be based on permitted flows, not actual flows. This problem has been resolved by reducing their permitted flow to 60,000 gpd.

The Department was recently notified that Atlantic Wire has started a new cadmium and tin coating operations at their facility. Based on a letter dated November 8, 2005 that was submitted by HRP Associates, Inc. on behalf of Atlantic, the wastewaters that will be generated from this operations will be collected and evaporated.

The tentative determination of an intent to renew this permit was published in the New Haven Register on August 18, 2005. During the 30 days comments period after this publication, HRP Associates, Inc., Atlantic's consultant requested that the annual monitoring requirement for Total Toxic Organics (TTOs) proposed in the draft permit be eliminated since Atlantic does not use and/or store any TTOs substances onsite.

The Bureau of Water Management (BWM) staff is recommending that Section 8 paragraph (D) of the permit be modified to remove the annual requirement to do monitoring for TTOs. In lieu of this monitoring requirement, on November 23, 2005, the Department approved the Solvent Management Plan prepared for Atlantic Wire Company LLC, submitted by HRP Associates, Inc. on April 1, 2004.