



PRETREATMENT PERMIT

issued to

Bridgeport Energy LLC  
10 Atlantic Street  
Bridgeport, CT 06604

**Location Address:**

10 Atlantic Street  
Bridgeport, CT 06604

Issuance Date: [TBD – Upon Signature]  
Effective Date: [1<sup>st</sup> of the Month

following

**Permit ID:** SP0002330  
Effective

Issuance Date]

**Expiration Date:** Five (5) Years from  
Date

**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 Title 40 of the Code of Federal Regulations Part 403 ("40 CFR Part 403").
- (B) Bridgeport Energy 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(s)
- (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.
- (H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the CGS).

## **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:

"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.

"Continuous", as a sample frequency, means data points must be collected and recorded by a continuous monitoring device in at least one-minute intervals for as long as a discharge occurs.

"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.

"Instantaneous", as a sample type, means a grab sample collected with automatic equipment or in-line analysis with automated instrumentation.

"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.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum readings recorded with the continuous monitoring device on the day(s) of sample.

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

### **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. 201502834 for permit reissuance, received on April 22, 2015, and the administrative record established in the processing of that application.
- (B) From the effective date of this permit, for a term not to exceed five years and 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. SP0002330, issued by the Commissioner to the Permittee on the issuance date, Application No. 201502834 received by the Department of Energy and Environmental Protection ("Department") on April 22, 2015, 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. 201502834, following the issuance date of 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 that 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: 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 below.

**Table A**

<b>Discharge Serial Number:</b> 200	<b>Monitoring Location:</b> 1
<b>Wastewater Description:</b> Boiler blowdown and boiler drain wastewater	
<b>Monitoring Location Description:</b> Sampling port prior to mixing with DSN 201 and domestic sewage discharge line	
<b>Discharge is to:</b> Bridgeport West Side Water Pollution Control Facility (“WPCF”)	

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported
Flow Rate (Average Daily) <sup>1</sup>	gpd	----	NA	Daily // Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period <sup>1</sup>	gpd	NA	200,000	Daily // Monthly	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	200,000	Twice Per Month	Daily Flow	NA	NR	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	NR	NA	----	Twice per Month	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-10.0	Twice per Month	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Temperature <sup>3</sup>	°C	NA	NA	NR	NA	----	Twice per Month	Grab
Total Suspended Solids	mg/L	NA	NA	NR	NA	100.0	Twice per Month	Grab

**Table Footnotes and Remarks:**

**Footnotes:**

<sup>1</sup> 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 Maximum Daily Flow for each month.

<sup>2</sup> 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’.

<sup>3</sup> Wastewater discharged under the authority of this permit shall not contain heat in amounts which will inhibit biological activity in the POTW, but in no case heat in such quantities that the influent temperature at the POTW exceeds 104°F (40°C).

**Remarks:**

- 1) Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.
- 2) If “----” is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”).

**Table B**

**Discharge Serial Number:** 201      **Monitoring Location:** 1

**Wastewater Description:** Steam piping clean drains wastewater (Steam turbine casings, high, intermediate, and low main steam piping systems, auxiliary steam piping, hot/cold and start-up/shutdown steam systems)

**Monitoring Location Description:** Sampling port after the closed cooling water system heat exchanger prior to combining with domestic wastewater

**Discharge is to:** Bridgeport West Side WPCF

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported
Flow Rate (Average Daily) <sup>1</sup>	gpd	----	NA	Daily // Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period <sup>1</sup>	gpd	NA	33,200	Daily // Monthly	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	33,200	Twice Per Month	Daily Flow	NA	NR	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	NR	NA	----	Twice per Month	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0-10.0	Twice per Month	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Continuous	Instantaneous
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Continuous	Instantaneous
Total Suspended Solids	mg/L	NA	NA	NR	NA	100.0	Twice per Month	Grab

**Table Footnotes and Remarks:**

**Footnotes:**

<sup>1</sup> 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 Maximum Daily Flow for each month.

<sup>2</sup> 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’.

**Remarks:**

- 1) Abbreviation used for units are as follows: gpd means gallons per day; mg/L means milligrams per liter; S.U. means Standard Units. Other abbreviations are as follows: NA means Not Applicable; NR means Not Required; RDS means Range During Sampling.
- 2) If “----” is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”).



- (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 personnel, the Permittee, or other parties.
- (D) There shall be no polychlorinated biphenyl compounds in the discharge authorized by this permit.
- (E) There shall be no wastewater pollutants from fly ash transport water in the discharge authorized by this permit.
- (F) There shall be no chemical metal cleaning wastewaters in the discharge authorized by this permit.

#### **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) 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 Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division within thirty (30) days of the date of the analytical laboratory report identifying the exceedance.
- (D) The results of chemical analysis required above shall be entered on the DMR and reported to the Bureau of Materials Management and Compliance Assurance using NetDMR. 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 submitted in NetDMR by the last day of the month following the month in which samples are taken.
- (E) 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 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.



(F) DMR Reporting Requirements

The Permittee and/or the Signatory Authority shall electronically submit DMRs and reports required under this permit to the Department using NetDMR, in satisfaction of the DMR submission requirement of Section 5(D) of this permit.

DMRs shall be submitted electronically no later than the last day of the month following the required sampling 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. 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>.

- (G) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority(ies) ("WPCA") involved in the treatment and collection of the permitted discharge.

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

(A) **Noncompliance Notifications:**

- (1) In accordance with Sections 22a-430-3(j)(8), 22a-430-3(j)(11)(D), 22a-430-3(k)(4), and 22a-430-3(i)(3) of the RSCA, the Permittee shall notify the Commissioner of the following actual or anticipated noncompliance with the terms or conditions of this permit within two hours of becoming aware of the circumstances. All other actual or anticipated violations of the permit shall be reported to the Commissioner within 24 hours of becoming aware of the circumstances:
  - a. A noncompliance that is greater than two times an effluent limitation;
  - b. Any condition that may endanger human health or the environment;
  - c. Any condition that may endanger the operation of a POTW, including sludge handling and disposal;
  - d. A failure or malfunction of monitoring equipment used to comply with the monitoring requirements of this permit;
  - e. Any actual or potential bypass of the Permittee's collection system or treatment facilities; or
  - f. Expansions or significant alterations of any wastewater collection, treatment facility, or its method of operation for the purpose of correcting or avoiding a permit violation.
- (2) Notifications shall be submitted via the Commissioner's online Noncompliance Notification Form: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.
- (3) Within five days of any notification of noncompliance in accordance with Sections 6(A)(1)(a) through 6(A)(1)(f) of this permit, the Permittee shall submit a follow-up report using the

Commissioner's online Noncompliance Follow-up Report Form: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.

The follow-up report shall contain, at a minimum, the following information: (i) A description of the noncompliance and its cause; (ii) the period of noncompliance, including exact dates and times; (iii) if the noncompliance has not been corrected, the anticipated time it is expected to continue; and (iv) steps taken or planned to correct the noncompliance and reduce, eliminate and prevent recurrence of the noncompliance.

- (4) Within 30 days of any notification of facility modifications reported in accordance with Section 6(A)(1)(f) of this permit, the Permittee shall submit a written follow-up report by submitting a "Facility and Wastewater Treatment System Modification Request for Determination" for the review and approval of the Commissioner. The report shall fully describe the changes made to the facility and reasons therefore.
  - (5) Notification of an actual or anticipated noncompliance or facility modification does not stay any term or condition of this permit.
- (B) In accordance with Section 22a-430-3(j)(11)(E) of the RSCA, the Permittee shall notify the Commissioner within 72 hours and in writing within 30 days when he or she knows or has reason to believe that the concentration in the discharge of any substance listed in the application, or any toxic substance as listed in Appendix B or D of RSCA Section 22a-430-4, has exceeded or will exceed the highest of the following levels: (1) One hundred micrograms per liter; (2) Two hundred micrograms per liter for acrolein and acrylonitrile, five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter for antimony; (3) An alternative level specified by the Commissioner, provided such level shall not exceed the level which can be achieved by the Permittee's treatment system; or (4) A level two times the level specified in the Permittee's application.

72 hour initial notifications shall be submitted via the Commissioner's online Noncompliance Notification Form. 30 day follow-up reports shall be submitted via the Commissioner's online Noncompliance Follow-up Report Form. The Forms are available at the Commissioner's website, here: <https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>.

## 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 or by posting on the Department's public website, 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 as defined by 40 CFR 403.3(v) 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-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-month period equal or exceed the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s) multiplied by 1.4 for BOD,

TSS, 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 a violation of Best Management Practices, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

DRAFT

Jennifer L. Perry, P.E.

Bureau Chief

Bureau of Materials Management and  
Compliance Assurance

**Pretreatment Permit Reissuance  
Fact Sheet**

<b><i>APPLICANT</i></b>	Bridgeport Energy LLC
<b><i>PERMIT NO.</i></b>	SP0002330
<b><i>APPLICATION NO.</i></b>	201502834
<b><i>DATE APPLICATION RECEIVED</i></b>	April 22, 2015
<b><i>LOCATION ADDRESS</i></b>	10 Atlantic Street Bridgeport CT 06604
<b><i>FACILITY CONTACT</i></b>	Nicholas Woods, EHS Compliance Coordinator Office Phone: (475) 201-1016 Email: <a href="mailto:nicholaswoods@cogentrix.com">nicholaswoods@cogentrix.com</a>
<b><i>MAILING ADDRESS</i></b>	10 Atlantic Street, Bridgeport CT 06604
<b><i>DMR CONTACT</i></b>	Nicholas Woods, EHS Compliance Coordinator Office Phone: (475) 201-1016 Email: <a href="mailto:nicholaswoods@cogentrix.com">nicholaswoods@cogentrix.com</a>
<b><i>PERMIT TERM</i></b>	5 Years
<b><i>PERMIT CATEGORY</i></b>	Pretreatment Significant Industrial User (SIU) Categorical Industrial User (CIU)
<b><i>SIC CODE(S)</i></b>	4911
<b><i>NAICS CODE(S)</i></b>	221112
<b><i>PERMIT TYPE</i></b>	Reissuance
<b><i>OWNERSHIP</i></b>	Private
<b><i>PUBLICLY OWNED TREATMENT WORKS ("POTW") THAT RECEIVES THE DISCHARGE</i></b>	Discharge to Bridgeport West Side Water Pollution Control Facility ("WPCF") via the City of Bridgeport collection system; NPDES Permit No. CT0100056 discharges to the Long Island Sound via Cedar Creek.
<b><i>DEEP STAFF ENGINEER</i></b>	Ryan Bellucci Office Phone: (860) 424 - 3741 Email: <a href="mailto:ryan.bellucci@ct.gov">ryan.bellucci@ct.gov</a>
<b><i>DATE APPLICATION PUBLIC NOTICED/ NAME OF PAPER</i></b>	September 16, 2015/ Connecticut Post

**DATE SUFFICIENCY REVIEW** *October 13, 2015*  
**COMPLETED**

**APPLICATION TIMELY AND SUFFICIENT**  Yes  No

**TENTATIVE DETERMINATION FACT SHEET DATE** *August 20, 2024*

**SECTION 1.0 PERMIT FEES**

**Application Fee:**

Filing Fee	Cost: \$1,300.00	Date Paid: 4/23/2015
Processing Fee	Cost: \$1,950.00	Date Paid: 10/13/2015

**Annual Fee:**

	<b>WASTEWATER CATEGORY (per 22a-430-7)</b>	<b>FLOW CATEGORY</b>	<b>DSN</b>	<b>ANNUAL FEE (per 22a- 430-7 and CGS 22a- 6f)</b>
	<i>Steam Electric Power Plants (per power generating unit)</i>	0-50,000	201	\$8,675.00
<b>TOTAL</b>				<b>\$8,675.00</b>

**SECTION 2.0 DECSRIPTION OF WASTE STREAMS**

The applicant seeks authorization for the following:

<b>DSN</b>	<b>PROPOSED AVERAGE DAILY FLOW (gpd)</b>	<b>PROPOSED MAXIMUM DAILY FLOW (gpd)</b>	<b>PROPOSED WASTESTREAMS</b>	<b>TREATMENT TYPE</b>	<b>DISCHARGE TO</b>
200	NA	200,000	Boiler blowdown and boiler drain wastewater	None	Bridgeport West Side WPCF
201	NA	33,200	Steam piping clean drains (Steam turbine casings, high, intermediate, and low main steam piping systems, auxiliary steam piping, hot/cold and start-up/shutdown steam systems)	None	Bridgeport West Side WPCF

DSN	PROPOSED AVERAGE DAILY FLOW (gpd)	PROPOSED MAXIMUM DAILY FLOW (gpd)	PROPOSED WASTESTREAMS	TREATMENT TYPE	DISCHARGE TO
202	NA	137,300	Floor drains, transformer secondary containment drains, laboratory sinks, condenser drain and boiler blowdown tank containment sump consisting of primarily stormwater, boiler water maintenance drain, and steam system drain wastewater (Floor washing and equipment drains for the following areas: workshop, steam turbine building, gas turbine building, boiler area, feed water pump house, and fire pump house)	Oil/water Separation	Bridgeport West Side WPCF

### SECTION 3.0 FACILITY BACKGROUND & PERMIT HISTORY

Bridgeport Energy LLC (“Applicant”) is a 560-megawatt natural gas-fired combined cycle electric generating facility. Bridgeport Energy LLC began discharging to the POTW on June 17, 1999 following pretreatment permit issuance on January 12, 1999. The facility discharges boiler blowdown, steam piping clean drains, and wastewater treated through oil/water separation that enters various drains throughout the facility.

The Operation and Maintenance Plan (“O&M”) was last revised on July 12, 2016.

#### 3.1 Solvent Management Plan

Is the facility operating under an approved solvent management plan (SMP)?

Yes    No    N/A

### 3.2 Compliance & Enforcement

#### 3.2.1 Reported Effluent Violations:

##### DSN 200-1

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
12/31/2019	pH, maximum	INST MAX	10.0	10.03	S.U.
12/31/2020	pH, maximum	INST MAX	10.0	10.1	S.U.

##### DSN 201-1

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
12/31/2020	pH, maximum	INST MAX	10.0	10.1	S.U.

##### DSN 202-1

Monitoring Period End Date	Parameter	Reporting Type	Permit Limit	DMR Value	Units
04/30/2019	Solids, total suspended	INST MAX	100.0	820.0	mg/L

3.2.2 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.

#### 3.2.3 Closed Enforcement Actions

Action No. NOVWRIN19047

Issued: 9/23/2019

Closed: 01/14/2020

Reason for Notice of Violation (“NOV”): Permittee violated the effluent limit for total suspended solids at DSN 202-1 for a sample collected on April 12, 2019 (concentration of 820 mg/L; effluent limit of 100 mg/L), failed to notify the Director of this exceedance, failed to monitor DSN 201-1 twice monthly as required in April 2019 and failed to notify the Director of a pH probe malfunction in March 2019. The NOV was closed on 1/14/2020 based on a sufficient response and signed compliance statement.

Reason for NOV: The flowmeter associated with DSN 201-1 is located prior to the closed cooling water system heat exchanger. The flowmeter associated with DSN 200-1 is located prior to the air-cooled heat exchanger. The Permittee failed to maintain instrumentation to allow accurate measurement of the volume of wastewater for DSN 200-1 and DSN 201-1. The NOV was closed on 11/13/2020 based on a sufficient response and signed compliance statement.

3.2.4 Does the current permit contain a compliance schedule (CS)?

Yes  No

*If yes, please check all that apply.*

Pollution Prevention  Water Conservation  Remediation  
 Water Quality Requirement  Treatment Requirement  Other

### 3.3 Permit Modifications

During last permit term, have there been any permit modifications?

Yes  No

### 3.4 Permits for other Discharges

1. Individual NPDES Permit (Permit No. CT0030180).
2. General Permit for the Discharge of Stormwater Associated with Industrial Activity (Permit No. GSI001119).

## **SECTION 4.0 THE ON-SITE WASTEWATER TREATMENT SYSTEM**

### 4.1 DSN 200 & DSN 201

There is no treatment associated with DSNs 200 and 201.

### 4.2 DSN 202

The oil/water separator system receives flows from all facility building floor drains (except for sanitary facilities). These drains are located in the gas turbine building, steam turbine building, workshop and storage facilities, feedwater pump house, and fire pump house. The secondary containment structures for five of the facility's electrical transformers also discharge to the oil/water separator via gravity. Drains from the feedwater pump and fire pump houses along with the boiler blowdown tank containment sump flow to the feedwater pump house sump (250 gals). The feedwater pump house sump then discharges to the steam turbine sump (600 gals). The steam turbine building floor drains, workshop and storage building floor drains, the laboratory sink, and the clean drains flash tank containment sump also flow to the steam turbine sump located in the steam turbine building.

Sources of wastewater contributing to DSN 202 include floor drains, transformer secondary containment drains, laboratory sinks, condenser drain and the boiler blowdown tank containment consisting of primarily stormwater, boiler water maintenance drain wastewater, and steam system drain wastewater (Floor washing and equipment drains for



the following areas: workshop, steam turbine building, gas turbine building, boiler area, feed water pump house, and fire pump house).

Wastewater entering the separator passes through structures that remove oil and solids. The output of the oil-water separator system is wastewater, oil, and solids. Oil separated from the wastewater is detained, if necessary, in the separator’s 500-gallon storage chamber. Oil level is monitored and periodically a third-party contractor pumps the waste off site. Solids separated from the wastewater remain in the separator. Periodically, flow to the separator ceases so that the solids can be removed and are transported offsite by a licensed contractor. The wastewater flows from the separator to the final sump, referred to as the GMB sump (300 gals), before being discharged into the sanitary sewer. Fluid-level switches activate the pumps at each sump. One sump pump activates when the fluid level rises to the intermediate level setting, and a second pump activates if the level reaches the upper fluid-level setting. Routine control room operator rounds include checking the fluid levels in all sumps and the indicator float on the oil storage chamber of the oil/water separator. The oil/water separator receives flow from the steam turbine sump and has a static holding capacity of 735 gallons. Its batch treatment capacity is 500 gallons per minute with a limit of 1,000 gallons per hour. Following the GMB sump, DSN 202 has continuous pH and flow monitoring and a grab sample port.

See Attachment A for a line diagram of the facility.

**SECTION 5.0 FEDERAL CATEGORICAL EFFLUENT LIMIT GUIDELINES**

Bridgeport Energy LLC initiated this discharge after October 14, 1980, the Steam Electric Power Generation regulations proposal date. Therefore, the facility is a new source, subject to the Pretreatment Standards for New Sources (PSNS) in 40 CFR 423.17.

**SECTION 6.0 EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

BASIS FOR LIMITS, STANDARDS OR CONDITIONS		DISCHARGE POINT(S)
<input checked="" type="checkbox"/>	Federal Effluent Limitation Guideline (“ELG”) – 40 CFR 403	DSN: 200, 201, 202
<input type="checkbox"/>	Pretreatment Standards for Existing Sources (“PSES”)	
<input checked="" type="checkbox"/>	Pretreatment Standards for New Sources (“PSNS”) 40 CFR 423.17	DSN: 200, 201, 202
<input type="checkbox"/>	Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”)	
<input checked="" type="checkbox"/>	Case-by-Case Determination using Best Professional Judgment (“BPJ”) RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	DSN: 200, 201, 202
<input checked="" type="checkbox"/>	Anti-Backsliding – RCSA Section 22a-430-4(l)(4)(D)(vi)	DSN: 200, 201, 202
<input checked="" type="checkbox"/>	“Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works”, USEPA, 1975-628-875	DSN: 202

## 6.1 Monitoring Parameters & Permit Limits

### 6.1.1 Local Limits

The Department of Energy and Environmental Protection (“DEEP”) is authorized by the Environmental Protection Agency (EPA) to administer the federal pretreatment program at the state-level as allowed by 40 CFR 403.10(e), as both the approval and control authority. EPA provides DEEP that authorization via a modified Memorandum of Agreement (“MOA”) dated June 3, 1981.

In Connecticut, all discharges must comply, at a minimum, with the general and specific prohibitions of the federal pretreatment standards and Section 22a-430-4(t) of the RCSA. To assure such compliance is achieved, state-issued pretreatment permits apply federal categorical and state regulatory standards and effluent limitations. DEEP may also apply additional or more stringent effluent limitations based on Best Professional Judgment pursuant to RCSA Section 22a-430-4(m), including local limits if such local limits were technically based, to mitigate the risk for a pollutant discharge to negatively impact receiving waters and/or the POTW’s operations, including sludge handling or disposal, worker health or safety, or otherwise interfere with the POTW’s ability to comply with its own NPDES permit.

In accordance with 40 CFR 403.5(c)(2), POTWs shall develop and enforce specific effluent limits for IUs to both prevent pass through and interference, and to keep the POTW in compliance with their NPDES permit or sludge use or disposal practices. In the State’s MOA with the EPA, the State must “assure that the development of specific limits for discharges of prohibited pollutants under 40 CFR 403.5(c) is at least as extensive as would have been required if these POTWs had developed local programs.” To comply with this agreement, the State will only utilize local limits developed technically [40 CFR 122.44(j)(2)(ii)] in accordance with EPA’s July 2004 Local Limits Development Guidance (EPA 833-R-04-002A) in a state permit. Local limits not incorporated into state pretreatment permits remain enforceable by the municipality as allowed by the local sewer use ordinance.

### 6.1.2 Slug Loading

Connecticut discharge regulations do not allow what is defined as a “slug loading” in 40 CFR 403.8(f)(2)(vi). The items listed in the definition are regulated as a spill or unplanned release under Section 22a-449 of the RCSA and/or as an unpermitted discharge under Section 22a-430 of the RCSA. The Department’s practice of applying instantaneous limits in permits further regulates slug loading. The Department’s various standard regulatory requirements governing including, but not limited to, proper operation and maintenance (RCSA Section 22a-430-3(f)); sludge disposal (RCSA Section 22a-430-3(g)); duty to mitigate (RCSA Section 22a-430-3(h)); facility modification and notification (RCSA Section 22a-430-3(i)); monitoring records and reporting requirements (RCSA Section 22a-430-3(j)); bypass (RCSA Section 22a-430-3(k)); effluent limitation violations (RCSA Section 22a-430-3(m)); resource conservation (RCSA Section 22a-430-3(o)); spill prevention and control (RCSA Section 22a-430-3(p)); instrumentation, alarm, flow recorders (RCSA Section 22a-430-3(q)); equalization

(RCSA Section 22a-430-3(r)); and the practice of applying monitoring requirements and instantaneous limits in permits further regulate slug loading.

### 6.1.3 Effluent Limitations & Monitoring Frequencies

The following table displays limits determined using best professional judgement. There are no applicable effluent limits found in 40 CFR 423.17 or Section 22a-430-4(s) of the RCSA.

#### DSN 200

Parameter	Units	BPJ		
		Average Monthly	Maximum Daily	Instantaneous
Flow, Maximum Daily	gpd	NA	<b>200,000</b>	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	----
pH, Day of Sampling	S.U.	NA	NA	<b>6.0-10.0</b>
Temperature	°C	NA	NA	----
Total Suspended Solids	mg/L	NA	NA	<b>100.0</b>

If “----” is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”). If “NA” is noted, this means there is no limit or monitoring required.

The following table provides the sampling frequency and additional information regarding the pollutants of concern.

Sample Type	Sample Frequency	Parameter	Comment
RCSA Sections 22a-430-4(l)(4)(D)(iii) and 22a-430-4(m)	Twice Per Month	Nitrogen, Ammonia (Total as N)	Present in the effluent during the last permit term. Expected source is use of aqueous ammonia within the Heat Recovery Steam Generator (“HRSG”) cycle
		Temperature	Elevated temperature expected due to boiler blowdown associated with the Heat Recovery Steam Generator (“HRSG”) cycle
		Total Suspended Solids (TSS)	Expected present due to dirt or debris entering the Heat Recovery Steam Generator (“HRSG”) cycle

The following table displays limits determined using best professional judgement. There are no applicable effluent limits found in 40 CFR 423.17 or Section 22a-430-4(s) of the RCSA.

**DSN 201**

Parameter	Units	BPJ		
		Average Monthly	Maximum Daily	Instantaneous
Flow, Maximum Daily	gpd	NA	<b>33,200</b>	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	----
pH, Day of Sampling	S.U.	NA	NA	<b>6.0-10.0</b>
Total Suspended Solids	mg/L	NA	NA	<b>100.0</b>

If “----” is noted in the limits column in the table, this means a limit is not specified but a sample must be collected and a value must be reported on the Discharge Monitoring Report (“DMR”). If “NA” is noted, this means there is no limit or monitoring required.

The following table provides the sampling frequency and additional information regarding the pollutants of concern.

Sample Type	Sample Frequency	Parameter	Comment
Grab Sample  RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)	Twice Per Month  RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)	Nitrogen, Ammonia (Total as N)	Present in the effluent during the last permit term. Expected source is use of aqueous ammonia within the steam piping clean drain system.
		Total Suspended Solids (TSS)	Expected present due to dirt or debris entering the steam piping drain system

The following table displays limits determined using best professional judgement. There are no applicable effluent limits found in 40 CFR 423.17. Limits defined in Section 22a-430-4(s) of the RCSA do not apply to steam electric generators.

**DSN 202**

Parameter	Units	BPJ		
		Average Monthly	Maximum Daily	Instantaneous
Flow, Maximum Daily	gpd	NA	<b>137,300</b>	NA
Nitrogen, Ammonia (Total as N)	mg/L	NA	NA	----
Oil & grease, Non-polar Material	mg/L	<b>50.0</b>	<b>100.0</b>	<b>150.0</b>
pH, Day of Sampling	S.U.	NA	NA	<b>6.0-10.0</b>
Total Suspended Solids	mg/L	NA	NA	<b>100.0</b>

If “----” is noted in the limits column in the table, this means a limit is not specified but a value must be reported on the Discharge Monitoring Report (“DMR”). If “NA” is noted, this means there is no limit or monitoring required.

The following table provides the sampling frequency and additional information regarding the pollutants of concern.

Sample Type	Sample Frequency	Parameter	Comment
Grab Sample RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)	Twice Per Month RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m)	Nitrogen, Ammonia (Total as N)	Present in the effluent during the last permit term. Expected source is ammonia-conditioned waters entering floor drains throughout the facility
		Oil & grease, Non-polar Material	Expected present due to machining oils and lubricants entering floor drains throughout the facility
		Total Suspended Solids (TSS)	Expected present due to dirt and debris entering the transformer secondary containment drains

## 6.2 Permit Limit Development

### 6.2.1 DSN 200, DSN 201, and DSN 202

**Nitrogen, Ammonia (Total as N):** In accordance with Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA, ammonia will be monitored in the reissuance of this permit. Ammonia has been present in detectable levels in discharge monitoring reports during the last permit term. Ammonia is expected to be present in the discharge due to use of aqueous ammonia in wastewater generating processes. There are no applicable categorical federal limits for ammonia found in 40 CFR 423.17. Limits found in Section 22a-430-4(s) of the RCSA do not apply to steam electric generators. Therefore, monitoring only will be required. The monitoring frequency of twice per month will be carried forward in the reissuance of this permit in accordance with Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA. The sample type will be grab in accordance 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA. A grab sample is representative of daily process operations where effluent quality is not expected to vary.

**Total Suspended Solids (“TSS”):** In accordance with Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA, total suspended solids will be monitored in the reissuance of this permit. TSS has been present in detectable levels in discharge monitoring reports during the last permit term. TSS is expected to be present in the discharge due to dirt or debris entering the system. The maximum instantaneous limit of 100.0 mg/L has been carried forward from the last permit in accordance with best professional judgement along with anti-backsliding regulations in accordance with Sections 22a-430-4(1)(4)(D)(iii), 22a-430-4(1)(4)(D)(vi), and 22a-430-4(m) of the RCSA. The monitoring frequency of twice per month will be carried forward in the reissuance of this permit in accordance with Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA. The sample type is grab in accordance 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA. A grab sample is representative of daily process operations where effluent quality is not expected to vary.

**pH:** In accordance with Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA, pH limits of 6.0-10.0 S.U. have been carried forward in the reissuance of this permit. This range will be protective of the sanitary sewer and reflects the allowable pH range found in other recently issued pretreatment permits.

### 6.2.2 DSN 202

**Oil & Grease, Non-polar Material:** In accordance with Sections 22a-430-4(1)(4)(D)(iii), 22a-430-4(1)(4)(D)(vi), and 22a-430-4(m) of the RCSA, oil & grease (non-polar material) will be monitored in the reissuance of this permit. Oil & grease is expected present due to machining oils and lubricants entering floor drains throughout the facility. Based on the recommended maximum limit of 100 mg/L of oil and grease of petroleum and mineral origins, as described in “Treatability of Oil and Grease Discharged to Publicly Owned Treatment Works”, USEPA, 1975-628-875, the AML of 50.0 mg/L, MDL of 100.0 mg/L, and MIL of 150.0 mg/L for oil & grease (non-polar material) have been incorporated into this permit. The monitoring frequency of twice per month has been carried forward in the reissuance of this permit in accordance with RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m). A grab sample will be used for oil & grease (non-polar material) in accordance with 40 CFR 403.12(g)(3).

## 6.3 Proposed Revisions

### 6.3.1 DSN 200

**Temperature:** In accordance with Sections 22a-430-4(1)(4)(D)(iii), 22a-430-4(1)(4)(D)(vi), and 22a-430-4(m) of the RCSA, temperature will be monitored in DSN 200 for the reissuance of this permit. Elevated temperatures are expected due to boiler blowdown associated with the Heat Recovery Steam Generator (“HRSG”) cycle. Temperature data provided with the permit application indicated a discharge temperature of 114.9 °F. In accordance with 40 CFR 403.5(b)(5), the following pollutants shall not be introduced to the POTW: Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40 °C (104 °F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits. The monitoring frequency will be twice per month and the sample type will be grab in accordance with Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m) of the RCSA. A grab sample is representative of daily process operations where effluent quality is not expected to vary.

### 6.3.2 DSN 200, DSN 201, and DSN 202

**Copper, Total:** Copper monitoring will no longer be required in the reissuance of this permit in accordance with RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m). There are no applicable categorical federal limits for copper found in 40 CFR 423.17. Limits found in Section 22a-430-4(s) of the RCSA do not apply to steam electric generators. Since July 2019, copper has had an average concentration of 0.015 mg/L in DSN 200, 0.0018 mg/L in DSN 201, and 0.02 mg/L in DSN 202. During the application processing, the Bridgeport West Side WPCF did not report any concern of pass through or interference due to these concentrations of copper in the discharge. Therefore, monitoring for copper will no longer be required in reissuance; however, monitoring will be included in the future if the WPCF or DEEP has concerns of pass through or interference.

**Lead, Total:** Lead monitoring will no longer be required in the reissuance of this permit in accordance with RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m). There are no applicable categorical federal limits for lead found in 40 CFR 423.17. Limits found in Section 22a-430-4(s) of the RCSA do not apply to steam electric generators. Since July 2019, lead has had an average concentration of 0.0004 mg/L in DSN 200 and 0.0137 mg/L in DSN 202. During this timeframe, lead was non-detect for each monitoring event of DSN 201. During the application processing, the Bridgeport West Side WPCF did not report any concern of pass through or interference due to these concentrations of lead in the discharge. Therefore, monitoring for lead will no longer be required in reissuance; however, monitoring will be included in the future if the WPCF or DEEP has concerns of pass through or interference.

### 6.3.3 DSN 200 and DSN 201

**Oil Petroleum, Total Recoverable:** Total recoverable oil petroleum monitoring will no longer be required for DSN 200 and DSN 201 in the reissuance of this permit in accordance with RCSA Sections 22a-430-4(1)(4)(D)(iii) and 22a-430-4(m). There are no applicable categorical effluent limits for total recoverable oil petroleum found in 40 CFR 423.17 or Section 22a-430-4(s) of the RCSA. Limits found in Section 22a-430-4(s) of the RCSA do not apply to steam electric generators. This parameter has consistently been nondetectable in the last permit term and is not expected to be present in the effluent.

## **SECTION 7.0 E-REPORTING**

The Permittee and/or the Signatory Authority shall electronically submit DMRs and reports required under this permit to the Department using NetDMR, in satisfaction of the DMR submission requirement of Section 5(D) of this permit.

DMRs shall be submitted electronically no later than the last day of the month following the required sampling 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. 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>.

## **SECTION 8.0 PUBLIC PARTICIPATION PROCEDURES**

### ***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. 201502834

PERMIT ID NO. SP0002330

Interested persons may obtain copies of the application from:

Nicholas Woods  
Bridgeport Energy LLC  
10 Atlantic Street  
Bridgeport CT 06604  
(475) 201-1016  
[nicholaswoods@cogentrix.com](mailto:nicholaswoods@cogentrix.com)

The application is available for inspection by contacting Ryan Bellucci at [ryan.bellucci@ct.gov](mailto:ryan.bellucci@ct.gov).

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 that are received within 30 days of this public notice. Written comments should be directed to Ryan Bellucci at [ryan.bellucci@ct.gov](mailto:ryan.bellucci@ct.gov) or 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 persons. Notice of any public hearing shall be published at least 30 days prior to the hearing.

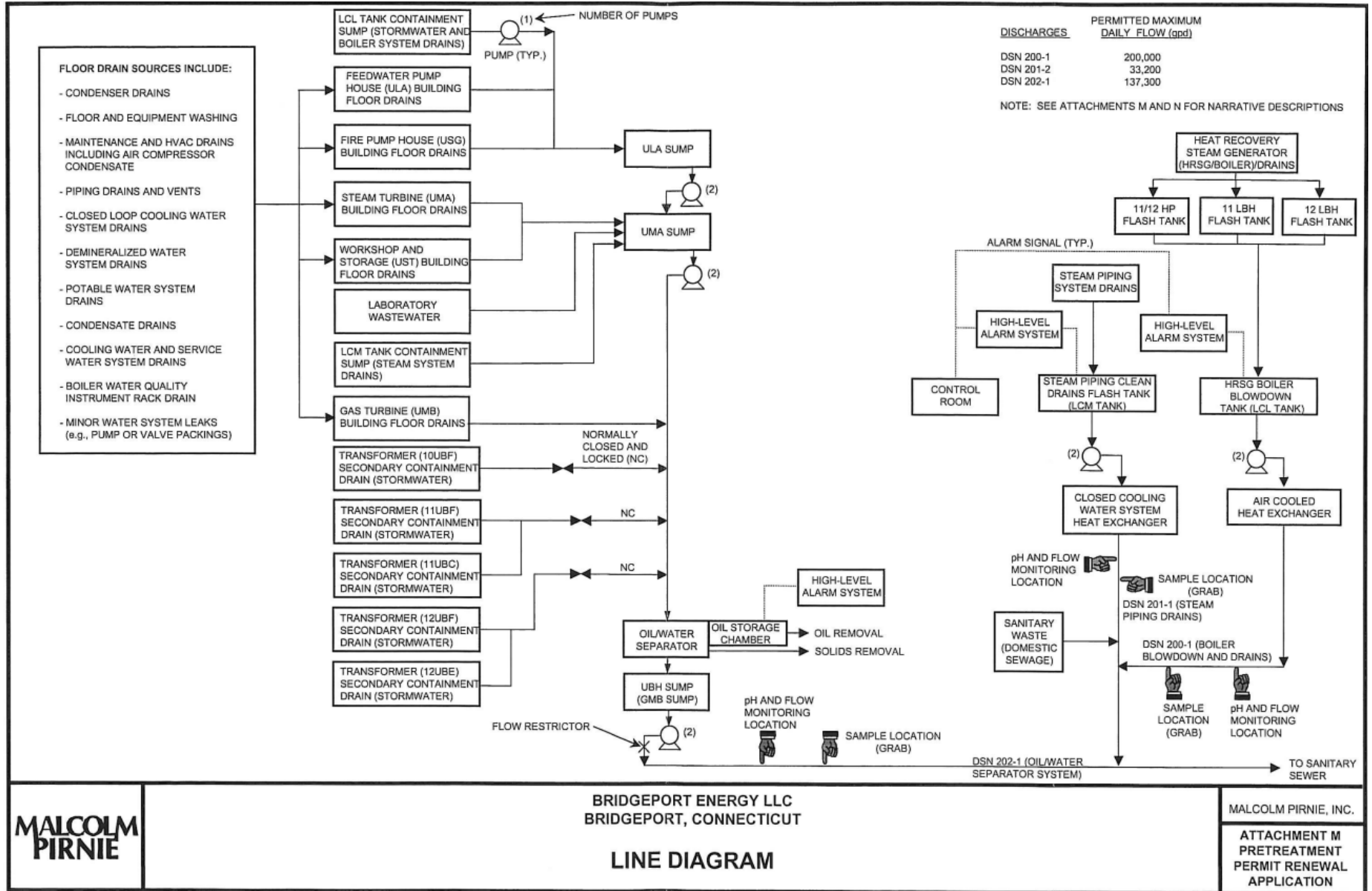


Petitions for a hearing should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. Original signed petitions may be scanned and sent electronically to [deep.adjudications@ct.gov](mailto:deep.adjudications@ct.gov) or may be mailed or delivered to: DEEP Office of Adjudications, 79 Elm Street, 3rd floor, Hartford, 06106-5127.

All petitions must be received within the comment period noted above. If submitted electronically, original signed petitions must also be mailed or delivered to the address above within ten days of electronic submittal. If a hearing is held, timely notice of such hearing will be published in a newspaper of general circulation. For additional information go to [www.ct.gov/deep/adjudications](http://www.ct.gov/deep/adjudications).

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act (ADA). If you are seeking a communication aid or service, have limited proficiency in English, wish to file an ADA or Title VI discrimination complaint, or require some other accommodation, including equipment to facilitate virtual participation, please contact the DEEP Office of Diversity and Equity at 860-418-5910 or by email at [deep.accommodations@ct.gov](mailto:deep.accommodations@ct.gov). Any person needing an accommodation for hearing impairment may call the State of Connecticut relay number - 711. In order to facilitate efforts to provide accommodation, please request all accommodations as soon as possible following notice of any agency hearing, meeting, program, or event.

# Attachment A: Line Diagram





**NOTICE OF TENTATIVE DETERMINATION  
TO REISSUE A STATE PRETREATMENT PERMIT  
FOR DISCHARGES INTO THE WATERS OF THE STATE OF CONNECTICUT**

**1.0 TENTATIVE DETERMINATION**

The Commissioner of Energy and Environmental Protection (“the Commissioner”) hereby gives notice of a tentative determination to renew a permit based on an application submitted by Bridgeport Energy LLC (“the applicant”) under Section 22a-430 of the Connecticut General Statutes (“CGS”) 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 1) with respect to DSN 200 and 201, continuance of the existing discharge would not cause pollution of the waters of the state; and 2) with respect to DSN 202, continuance of the existing treatment system to treat the discharge would protect the waters of the state from pollution.

The proposed permit, if issued by the Commissioner, will require treatment of some wastewaters to meet applicable effluent limitations and periodic monitoring to demonstrate that the discharge will not cause pollution.

**2.0 APPLICANT'S PROPOSAL**

Bridgeport Energy LLC presently discharges a maximum of 370,500 gallons per day of boiler blowdown and boiler drain wastewater, steam piping clean drain wastewaters, and floor drain, secondary containment, and laboratory sink wastewaters to the Bridgeport West Side Water Pollution Control Facility from Steam Electric Power Generating operations at a natural gas-fired combined cycle electric generating facility.

<b>Applicant</b>	<b>Facility</b>	<b>Receiving POTW</b>
Bridgeport Energy LLC 10 Atlantic Street Bridgeport, CT 06604	Bridgeport Energy LLC 10 Atlantic Street Bridgeport, CT 06604	Bridgeport West Side Water Pollution Control Facility

**3.0 REGULATORY CONDITIONS**

Type of Treatment

DSN 200 and DSN 201 have no treatment.

Wastewaters from DSN 202 undergo oil/water separation prior to discharge to the sanitary sewer.

### Effluent Limitations

This permit contains effluent limitations consistent with a case by case determination using the criteria of Best Professional Judgement and Pretreatment Standards for New Sources (PSNS) 40 CFR 423.17, and will protect the waters of the state from pollution when all of the conditions of this permit have been met.

In accordance with Section 22a-430-4(1) of the Regulations of Connecticut State Agencies (“RCSA”), the permit contains effluent monitoring/limitations for priority pollutants, total oil & grease (non-polar material), conventional pollutants, and pH.

### **4.0 COMMISSIONER'S AUTHORITY**

The Commissioner is authorized to approve or deny such permits pursuant to Section 22a-430 of the CGS and Section 22a-430-3 and 4 of the Water Discharge Permit Regulations (“RCSA”).

### **5.0 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. 201502834      PERMIT ID NO. SP0002330

Interested persons may obtain copies of the application from  
Nicholas Woods  
Bridgeport Energy LLC  
10 Atlantic Street  
Bridgeport, CT 06604  
(475) 201-1016

The application is available for inspection by contacting Ryan Bellucci at (860) 424-3741 and [ryan.bellucci@ct.gov](mailto:ryan.bellucci@ct.gov) at the Water Permitting and Enforcement Division, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 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.

## **6.0 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 Ryan Bellucci, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106 5127 or [ryan.bellucci@ct.gov](mailto:ryan.bellucci@ct.gov). 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.

## **7.0 PETITIONS FOR HEARING**

Petitions for a hearing shall be submitted within thirty (30) days from the date of publication of this public notice and should include the application number noted above and also identify a contact person to receive notifications. Petitions should also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. The Office of Adjudications will accept electronically-filed petitions for hearing in addition to those submitted by mail or hand-delivered. Petitions with required signatures may be sent to [deep.adjudications@ct.gov](mailto:deep.adjudications@ct.gov); those mailed or delivered should go to the DEEP Office of Adjudications, 79 Elm Street, Hartford, CT 06106. If the signed original petition is only in an electronic format, the petition must be submitted with a statement signed by the petitioner that the petition exists only in that form. Original petitions that were filed electronically must also be mailed or delivered to the Office of Adjudications within 30 days of electronic submittal. Additional information at [www.ct.gov/deep/adjudications](http://www.ct.gov/deep/adjudications).

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act (ADA). If you are seeking a communication aid or service, have limited proficiency in English, wish to file an ADA or Title VI discrimination complaint, or require some other accommodation, including equipment to facilitate virtual participation, please contact the DEEP Office of Diversity and Equity at 860-418-5910 or by email at [deep.accommodations@ct.gov](mailto:deep.accommodations@ct.gov). Any person needing an accommodation for hearing impairment may call the State of Connecticut relay number - 711. In order to facilitate efforts to provide accommodation, please request all accommodations as soon as possible following notice of any agency hearing, meeting, program, or event.



Audra Dickson

Director

Water Permitting and Enforcement Division

Bureau of Materials Management and Compliance Assurance

Dated: August 20, 2024