

PRETREATMENT PERMIT

issued to

Crabtree & Evelyn, Ltd.
102 Peake Brook Road
Woodstock, CT 06281

Location Address:

102 Peake Brook Road
Woodstock, CT

Permit ID: SP0002299

Permit Expires: _____

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403 (Title 40 of the Code of Federal Regulations, Part 403).
- (B) Crabtree & Evelyn, Ltd. ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

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

Section 22a-430-4 Procedures and Criteria

- (a) Duty to Apply
- (b) Duty to Reapply
- (c) Application Requirements
- (d) Preliminary Review
- (e) Tentative Determination
- (f) Draft Permits, Fact Sheets
- (g) Public Notice, Notice of Hearing
- (h) Public Comments

- (i) Final Determination
 - (j) Public Hearings
 - (k) Submission of Plans and Specifications. Approval.
 - (l) Establishing Effluent Limitations and Conditions
 - (m) Case by Case Determinations
 - (n) Permit issuance or renewal
 - (o) Permit Transfer
 - (p) Permit revocation, denial or modification
 - (q) Variances
 - (r) Secondary Treatment Requirements
 - (s) Treatment Requirements for Metals and Cyanide
 - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars (\$25,000) may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above, the following definitions shall apply to this permit:
- "----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the discharge monitoring report ("DMR").
 - "Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l). Otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.
 - "Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.
 - "Daily Quantity" means the quantity of waste generated during an operating day.
 - "gpd" means gallons per day.
 - "Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.
 - "Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l). Otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"mg/l" means milligrams per liter.

"NA" as a monitoring table abbreviation means "not applicable".

"NR" as a monitoring table abbreviation means "not required".

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

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

"S.U." means Standard Units.

"Twice per Month", when used as a sample frequency, shall mean two samples per calendar month collected no less than 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. 201304003 for permit reissuance received on September 9, 2013 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT REISSUANCE], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002299, issued by the Commissioner to the Permittee on January 30, 2009, the previous application submitted by the Permittee on September 4, 2001, 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. SP0002299, issued by the Commissioner to the Permittee on January 30, 2009.
- (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0002299, issued by the Commissioner to the Permittee on January 30, 2009, Application No. 201304003 received by the Department on September 9, 2013, 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. SP0002299, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance or other provisions that may be authorized under the Federal Clean Water Act or the 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 discharge shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below.

Table A

Discharge Serial Number: DSN 200-1 | **Monitoring Location: 1**
Wastewater Description: Soap, detergent and cosmetic manufacturing and laboratory wastewaters; non-contact cooling water from emergency relief valves.
Monitoring Location Description: From the recirculation loop valve in the pumping tank
Discharge is to: The Putnam Publicly Owned Treatment Works (“POTW”) via the sanitary sewer system in the town of Woodstock

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported
Biochemical Oxygen Demand (“BOD”), 5-day	mg/l	----	----	Twice per month	Daily Composite	NA	NR	NA
Chemical Oxygen Demand (“COD”)	mg/l	----	----	Twice per month	Daily Composite	NA	NR	NA
Flow Rate (Average Daily) ¹	gpd	10,600	NA	Daily	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	15,000	Daily	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	15,000	Twice per month	Daily Flow	NA	NR	NA
Oil Petroleum, Total Recoverable	mg/l	NA	NA	NR	NA	----	Monthly	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.0-10.0	Twice per month	Grab
pH, Minimum	S.U.	NA	NA	NR	NA	5.0	Instantaneously	Grab
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Instantaneously	Grab
Surfactants	mg/l	----	----	Twice per month	Daily Composite	NA	NR	NA
Total Suspended Solids (“TSS”)	mg/l	----	----	Twice per month	Daily Composite	NA	NR	NA

Footnotes:

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

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

Table B

Discharge Serial Number: DSN 201-1

Monitoring Location: 1

Wastewater Description: Product development laboratory washing activities wastewaters

Monitoring Location Description: From laboratory sink

Discharge is to: The Putnam POTW via the sanitary sewer system in the town of Woodstock

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/Reporting Frequency ²	Sample Type or Measurement to be Reported
Flow Rate (Average Daily) ¹	gpd	----	NA	Daily	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period ¹	gpd	NA	160	Daily	Daily Flow	NA	NR	NA
Flow (Day of Sampling)	gpd	NA	160	Monthly	Daily Flow	NA	NR	NA
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.0-10.0	Monthly	Grab
pH, Minimum	S.U.	NA	NA	NR	NA	5.0	Monthly	Grab
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Monthly	Grab

Footnotes:

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

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

- (B) All samples shall be comprised of only those wastewaters described in this schedule. Therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by the Department of Energy and Environmental Protection personnel, the Permittee, or other parties.

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

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for total recoverable metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Water Permitting and Enforcement Division at the address below. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at the address below by the last day of the month following the month in which samples are taken.

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

- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g., monthly, quarterly) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g., per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.
- (E) NetDMR Reporting Requirements

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

- a. Submittal of *NetDMR Subscriber Agreement*

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

- b. Submittal of Reports Using NetDMR

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

submission requirement of section 5(C) of this permit.

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

c. Submittal of NetDMR Opt-Out Requests

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

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

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

(F) Copies of all DMRs shall be submitted concurrently to the Putnam Publicly Owned Treatment Works ("POTW").

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

- (A) If any sample analysis indicates that an effluent limitation specified in section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Water Permitting and Enforcement Division (Attn: DMR Processing) within thirty (30) days of the exceedance.
- (B) The Permittee shall immediately notify the Water Permitting and Enforcement Division and the Putnam POTW of all discharges that could cause problems to the POTW, including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in section 4 of this permit, the Permittee shall notify the Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

SECTION 7: COMPLIANCE SCHEDULE

- (A) On or before sixty (60) days after the permit issuance date, the Permittee shall submit for the Commissioner's review and written approval 1) a proposed schedule, plans and specifications and/or manufacturer's product information for the installation of a recirculation pump in tank no. 2, and 2) an updated copy of the Operation and Maintenance Manual. The Operation and Maintenance Manual shall describe the standard operating procedures implemented for the collection of flow proportional daily composite samples prior to discharge to the sewer.

SECTION 8: COMPLIANCE CONDITIONS

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

User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six percent (66%) or more of all measurements taken for the same pollutant parameter during a six (6) month period exceed (by any magnitude) the Average Monthly, Maximum Daily or Maximum Instantaneous Limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period equal or exceed the Average Monthly, Maximum Daily or Maximum Instantaneous Limit(s) multiplied by 1.4 for biochemical oxygen demand, total suspended solids, or fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with the 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 BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

Michael Sullivan
Deputy Commissioner
Department of Energy and Environmental Protection

MS/MVM

cc: Town of Putnam POTW

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Crabtree & Evelyn, Ltd.

PERMIT, ADDRESS, AND FACILITY DATA

Permit No. 201304003

Application No. SP0002299

<u>Mailing Address:</u> Street: P.O. Box 167 City: Woodstock ST: CT Zip: 06281 Contact Name: Randy Bauer Phone No.: (860) 928-2761 x3850 Email: Rbauer@crabtree-evelyn.com	<u>Location Address:</u> Street: 102 Peake Brook Road City: Woodstock ST: CT DMR Contact: Randy Bauer Phone No.: (860) 928-2761 x3850 Email: Rbauer@crabtree-evelyn.com
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Permit Information

Duration 5 Year X 10 Year ___ 30 Year
Type New ___ Reissuance X Modification
Categorization Point (X) Non-Point () GIS #
NPDES () Pretreatment (X) Groundwater (UIC) () Groundwater (Other) ()

 NPDES Major (MA)
 NPDES Significant Minor or Pretreatment SIU (SI) **X**
 NPDES or Pretreatment Minor (MI)
 Pretreatment Significant Industrial User (SIU) **X**
 Pretreatment Categorical (CIU) **X**

Standard Industrial Classification ("SIC") Code: 2844 – Perfumes, Cosmetics, and Other Toilet Preparations
 2841 – Soap and Other Detergents, except Specialty Cleaners

Compliance Issues

Compliance schedule? Yes No X
 Is the permittee subject to a pending enforcement action? Yes No X

Ownership Code

Private X Federal ___ State ___ Municipal ___ Other

DEEP Staff Engineer Mariana Miller

Permit Fees

Discharge Code	DSN Number	Annual Fee
501059Z and 501032X	200-1 and 201-1	\$9,085.00

For Sewer Discharges

The discharge is to the Putnam POTW via the Town of Woodstock sanitary sewer system. The facility I.D. number of the POTW is 116-001.

Nature of Business Generating Discharge

Crabtree & Evelyn ("C&E") develops, manufactures and packages creams, lotions, liquid soaps, shampoos, conditioners, massage and bath oils, body and hand washes, bath gels, and body and hand scrubs.

Process and Treatment Description (by Discharge Serial Number ("DSN"))

DSN 200-1 – Wastewater is generated by cleaning multiple work areas within the toiletries blending and filling departments. There is also a discharge of non-contact cooling water from an emergency pressure relief system. Wastewaters are treated in two separator tanks. The pH of the wastewaters is adjusted prior to discharge.

DSN 201-1 – Wastewater is generated by cleaning glassware in the research and development lab. No treatment is necessary.

Resources Used to Draft Permit

- Federal Effluent Limitation Guidelines 40 CFR 417, Subpart H: Soap and Detergent Manufacturing Point Source Category, Manufacture of Liquid Soaps Subcategory; 40 CFR 403: General Pretreatment Regulations for Existing and New Sources of Pollution
- Performance Standards
- Federal Development Document
- Treatability Manual
- Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy
- Coastal Management Consistency Review Form
- Other

Basis for Limitations, Standards or Conditions

- Case-by-Case using Best Professional Judgment ("BPJ") (See *Comments*)

Comments

The pH limits of 5.0-10.0 S.U., maintained from the previous permit, are considered to be protective of sanitary sewer systems.

Crabtree & Evelyn ("C&E") was previously categorized under 40 CFR 417, Subpart P: Manufacture of Liquid Detergents Subcategory. However, C&E does not manufacture any detergents at the facility. C&E representatives have indicated that the liquid soaps manufactured by C&E are a blend of surfactants, not saponified oils or fatty acids. The oils and fatty acids used are blended with emulsifiers to create a variety of personal care products. As such, division staff and C&E representatives feel that 40 CFR 417, Subpart H is most applicable to the operations that take place at the facility.

This facility is subject to the Pretreatment Standards for Existing Sources because the dates when indirect chargers would be considered to be 'new sources' under 40 CFR 417 apply only to subparts O, P, Q and R.

In accordance with 40 CFR 417.84, any existing source subject to regulation under this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR 403. In addition, monitoring is required for biochemical oxygen demand (5 day), total suspended solids, oil and grease, pH, and chemical oxygen demand. These requirements are reflected in monitoring table A of this permit. Monitoring requirements have also been retained for surfactants.

40 CFR 417.166(a) (the Pretreatment Standards for New Sources in subpart P) states "There shall be no discharge of wastewater streams in which both the COD/BOD7 ratio exceeds 10.0 and the COD exceeds 1.10 kg/kg of anhydrous product." As such, the previously issued permit required C&E to monitor DSN 200 for BOD7. This monitoring requirement has not been included in this permit, given that the discharge is more appropriately regulated under subpart H.

On May 26, 2011, C&E submitted Application No. 201103854 to modify the average monthly flow limit for DSN 200-1 from 2,000 gpd to 10,600 gpd and the maximum daily flow limit for DSN 200-1 from 4,800 gpd to 15,000 gpd. A permit modification was issued to C&E on September 28, 2011. This permit contains the flow rates authorized under the modification.

On April 21, 2014, C&E submitted a request for approval to re-route the air compressor condensate discharge from the boiler room to the floor drain in the facility washroom. It was anticipated that there would not be a change in flow. This change was approved on June 2, 2014.

C&E also generates wastewaters covered under the *General Permit for the Discharge of Stormwater Associated with Industrial Activity*.

The Putnam POTW confirmed its approval with the permit conditions on _____.

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

TENTATIVE DECISION

The Commissioner of Energy and Environmental Protection (“the Commissioner”) hereby gives notice of a tentative decision to renew a permit based on an application submitted by **Crabtree & Evelyn, Ltd.** (“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 decision that continuance of the existing system to treat the discharge would protect the waters of the state from pollution, and the Commissioner proposes to renew a permit for the discharge to the Putnam Publicly Owned Treatment Works (“POTW”) via the sanitary sewer system in the town of Woodstock.

The proposed permit, if issued by the Commissioner, will require that all wastewater be treated to meet the applicable effluent limitations.

APPLICANT'S PROPOSAL

Crabtree & Evelyn, Ltd. proposes to continue discharging up to 15,160 gallons per day (“gpd”) of treated wastewaters (15,000 gpd from Discharge Serial Number (“DSN”) 200-1 and 160 gpd from DSN 201-1) to the Putnam POTW from operations at a soap manufacturing facility.

The name and mailing address of the permit applicant are **Crabtree & Evelyn, Ltd., P.O. Box 167, Woodstock, CT 06281.**

The activity takes place at 102 Peake Brook Road, Woodstock, CT.

REGULATORY CONDITIONS

Type of Treatment

DSN 200-1 – Wastewater is generated by cleaning multiple work areas within the toiletries blending and filling departments. There is also a discharge of non-contact cooling water from an emergency pressure relief system. Wastewater is treated in two separator tanks. The pH of the wastewater is adjusted prior to discharge.

DSN 201-1 – Wastewater is generated by cleaning glassware in the research and development lab. No treatment is necessary.

Effluent Limitations

This permit contains effluent limitations consistent with a Case-by-Case Determination using the criteria of Best Professional Judgment and Pretreatment Standards for New Sources under 40 CFR 417.84, and which will protect the waters of the state from pollution when all the conditions of this permit have been met.

In accordance with section 22a-430-4(1) of the Regulations of Connecticut State Agencies (“RCSA”), the permit contains monitoring requirements for biochemical oxygen demand, chemical oxygen demand, oil and grease, pH, surfactants and total suspended solids.

Compliance Schedule

This permit contains an enforceable compliance schedule which requires that on or before sixty (60) days after the permit issuance date, the applicant submits a proposed schedule, plans and specifications and/or manufacturer’s product information for the installation of a recirculation pump, and an updated Operation and Maintenance Manual, which will describe the standard operating procedures implemented for the collection of flow proportional daily composite samples.

COMMISSIONER'S AUTHORITY

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

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. 201304003

PERMIT I.D. NO. SP0002299

Interested persons may obtain copies of the application from Randy Bauer, P.O. Box 167, Woodstock, CT 06281. (860) 928-2761 x3850.

The application is available for inspection by contacting Mariana Miller, (860) 424-3025, at the Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127 from 8:30-4:30, Monday through Friday.

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

PUBLIC COMMENT

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

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

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

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

Dated: 12/01/2015