Agenda Item 7 – Covidien Draft Permit Renewal

COVIDIEN DRAFT NEW PERMIT

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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

PRETREATMENT PERMIT

issued to

Covidien Limited Partnership
195 McDermott Road
North Haven, CT 06473

Location Address:
195 McDermott Road
North Haven, CT 06473

Issuance Date:
Effective Date:
Expiration Date:

Permit ID: SP0002026

SECTION 1: GENERAL PROVISIONS

(A) This permit is issued 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) Covidien Limited Partnership, ("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 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").

"Annually" in the context of a sampling frequency, means the sample must be collected in the month of June.

"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.

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

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

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

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

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of March, June, September, and December.

"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.

"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.

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

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S FINAL DETERMINATION

(A) The Commissioner has made a final determination and found that the continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's final determination is based on Application No. 201502864 for permit reissuance received on April 24, 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. SP0002026, issued by the Commissioner to the Permittee on the issuance date, Application No. 201502864 received by the Department of Energy and Environmental Protection ("Department") on April 24, 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. SP0002026, 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

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

Wastewater Description: Process wastewater from Polymer Development and Braid Manufacturing

Monitoring Location Description: After final pH adjustment tank

Discharge is to: The Town of North Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency [2]	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/ Reporting Frequency[2]	Sample Type or Measurement to be Reported
Acenaphthene*	µg/l	19	47	Semi-Annually	Daily Composite	70.5	NR	Grab
Anthracene*	µg/l	19	47	Semi-Annually	Daily Composite	70.5	NR	Grab
Benzene*	µg/l	57	134	NR	NA	201	Semi-Annually	Grab
Bis(2-ethylhexyl) phthalate	µg/l	95	258	Semi-Annually	Daily Composite	387	NR	Grab
Carbon Tetrachloride*	µg/l	142	380	NR	NA	570	Semi-Annually	Grab
Chlorobenzene*	µg/l	142	380	NR	NA	570	Semi-Annually	Grab
Chloroethane*	µg/l	110	295	NR	NA	442.5	Semi-Annually	Grab
Chloroform*	µg/l	111	325	NR	NA	487.5	Semi-Annually	Grab
Di-n-butyl phthalate*	µg/l	20	43	Semi-Annually	Daily Composite	64.5	NR	Grab
1,2-Dichlorobenzene*	µg/l	196	794	NR	NA	1,191	Semi-Annually	Grab
1,3-Dichlorobenzene*	µg/l	142	380	NR	NA	570	Semi-Annually	Grab
1,4-Dichlorobenzene*	µg/l	142	380	NR	NA	570	Semi-Annually	Grab
1,1-Dichloroethane*	µg/l	22	59	NR	NA	88.5	Semi-Annually	Grab
1,2-Dichloroethane*	µg/l	180	574	NR	NA	861	Semi-Annually	Grab
1,1-Dichloroethylene*	µg/l	22	60	NR	NA	90	Semi-Annually	Grab
1,2-trans-Dichloroethylene*	µg/l	25	66	NR	NA	99	Semi-Annually	Grab
1,2-Dichloropropane*	µg/l	196	794	NR	NA	1,191	Semi-Annually	Grab
1,3-Dichloropropylene*	µg/l	196	794	NR	NA	1,191	Semi-Annually	Grab
Diethyl phthalate*	µg/l	46	113	Semi-Annually	Daily Composite	169.5	NR	Grab
Dimethyl phthalate*	µg/l	19	47	Semi-Annually	Daily Composite	70.5	NR	Grab
4,6-Dinitro-o-cresol*	µg/l	78	277	Semi-Annually	Daily Composite	415.5	NR	Grab
Ethyl acetate	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab
Ethylbenzene*	µg/l	142	380	NR	NA	570	Semi-Annually	Grab
Flow, Day of Sampling	GPD	NA	80,000	Semi-Annually	Daily Flow	NA	NR	Grab
Flow, Maximum during a 24-hour period [1]	GPD	NA	80,000	Continuous / Monthly	Daily Flow	NA	NR	Grab
Flow Rate (Average Daily) [1]	GPD	40,000	NA	Continuous / Monthly	Daily Flow	NA	NR	Grab
Fluoranthene*	µg/l	22	54	Semi-Annually	Daily Composite	81	NR	Grab
Fluorene*	µg/l	19	47	Semi-Annually	Daily Composite	70.5	NR	Grab
Formaldehyde	mg/l	NA	----	Semi-Annually	Daily Composite	NA	NR	Grab
Hexachlorobenzene*	µg/l	196	794	Semi-Annually	Daily Composite	1,191	NR	Grab

Hexachlorobutadiene*	µg/l	142	380	Semi-Annually	Daily Composite	570	NR	Grab
Hexachloroethane*	µg/l	196	794	Semi-Annually	Daily Composite	1,191	NR	Grab
Methyl Chloride*	µg/l	110	295	NR	NA	442.5	Semi-Annually	Grab
Methylene Chloride*	µg/l	36	170	NR	NA	255	Semi-Annually	Grab
Naphthalene*	µg/l	19	47	Semi-Annually	Daily Composite	70.5	NR	Grab
Nitrobenzene*	µg/l	2,237	6,402	Semi-Annually	Daily Composite	9,603	NR	Grab
2-Nitrophenol*	µg/l	65	231	Semi-Annually	Daily Composite	346.5	NR	Grab
4-Nitrophenol*	µg/l	162	576	Semi-Annually	Daily Composite	864	NR	Grab
Oil Petroleum, Total Recoverable	mg/l	NA	NA	NR	NA	100.00	Semi-Annually	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.5-10.5	Semi-Annually	RDS
pH, Continuous	S.U.	NA	NA	NR	NA	5.5-10.5	Semi-Annually	RDM
Phenanthrene*	µg/l	19	47	Semi-Annually	Daily Composite	70.5	NR	Grab
Pyrene*	µg/l	20	48	Semi-Annually	Daily Composite	72	NR	Grab
Suspended Solids, Total	mg/l	NA	----	Semi-Annually	Daily Composite	NA	NR	Grab
Tetrachloroethylene*	µg/l	52	164	NR	NA	246	Semi-Annually	Grab
Tin	mg/l	NA	----	Semi-Annually	Daily Composite	NA	NR	Grab
Toluene*	µg/l	28	74	NR	NA	111	Semi-Annually	Grab
Total Cyanide*	µg/l	420	1,200	NR	NA	1,800	Semi-Annually	Grab
Total Lead*	µg/l	320	690	Semi-Annually	Daily Composite	1,035	NR	Grab
Total Zinc*	µg/l	1,050	2,610	Semi-Annually	Daily Composite	3,915	NR	Grab
1,2,4-Trichlorobenzene*	µg/l	196	794	Semi-Annually	Daily Composite	1,191	NR	Grab
1,1,1-Trichloroethane*	µg/l	22	59	NR	NA	88.5	Semi-Annually	Grab
1,1,2-Trichloroethane*	µg/l	32	127	NR	NA	190.5	Semi-Annually	Grab
Trichloroethylene*	µg/l	26	69	NR	NA	103.5	Semi-Annually	Grab
Vinyl Chloride*	µg/l	97	172	NR	NA	258	Semi-Annually	Grab

Table Footnotes and Remarks:

Footnotes:

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

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

Remarks:

*The Permittee is hereby authorized to forego sampling for these parameters in accordance with section 40 CFR 403.12(e)(2). Consistent with this section of the regulations, the Permittee shall include a statement on each Discharge Monitoring Report ("DMR"), using the language from Attachment A, certifying there has been no increase in the levels of the noted parameters due to the activities at the facility since filing of the last DMR. Additionally, in the event that any of these chemical parameters are found to be present or are expected to be present based on changes that occur in the Permittee's operations, the Permittee shall notify the Department and must immediately comply with the monitoring requirements provided in the table above.

Table B

Discharge Serial Number: 202-1 | **Monitoring Location: 1**

Wastewater Description: Process wastewater from Needle Manufacturing, and biosurgery barriers and sealants wastewater

Monitoring Location Description: After final pH adjustment tank, prior to discharge to the sanitary sewer

Discharge is to: The Town of North Haven Water Pollution Control Facility

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
Cadmium, Total*	mg/l	0.07	0.11	Semi-Annually	Daily Composite	0.17	NR	Grab
Chromium, Hexavalent	mg/l	0.1	0.2	Quarterly	Daily Composite	0.3	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Copper, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Cyanide, Total*	mg/l	0.65	1.2	Semi-Annually	Daily Composite	1.8	NR	Grab
Flow, Day of Sampling[1]	GPD	NA	6,000	Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during a 24-hr period[1]	GPD	NA	6,000	Monthly	Daily Flow	NA	NR	NA
Flow Rate (Average Daily)[1]	GPD	----	NA	Monthly	Daily Flow	NA	NR	NA
Lead, Total*	mg/l	0.1	0.5	Monthly	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.5-10.5	Monthly	Grab
pH, Maximum	S.U.	NA	NA	NR	NA	10.5	Monthly	Grab
pH, Minimum	S.U.	NA	NA	NR	NA	5.5	Monthly	Grab
Silver, Total*	mg/l	0.1	0.43	Semi-Annually	Daily Composite	0.65	NR	Grab
Zinc, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	Grab
Total Toxic Organics[3]	mg/l	NA	2.13	NR	Daily Composite	2.13	Monthly	Grab

Table Footnotes and Remarks:

Footnotes:

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

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

[3]See Section 5(G) of this permit

Remarks:

*Although (1) Cadmium, Total, (2) Cyanide, Total, (3) Lead, Total, (4) Silver, Total are regulated chemicals included in the federal wastewater discharge category associated with the category of this discharge (40 CFR 433), the Permittee is hereby authorized to forego sampling for these parameters in accordance with Section 40 CFR 430.12(e)(2) as the parameters have been identified as Non-Detect and Believed Absent within Application No. 201502864 and associated documents. Consistent with this section of the regulations, the Permittee shall include a statement on each Discharge Monitoring Report ("DMR"), using the language from Attachment A, certifying there has been no increase in the levels of the four (4) specified parameters due to the activities at the facility during the reporting period. In the event that any of the four (4) specified parameters are found to be present or expected to be present at levels higher than that of the background levels from the intake water, the Permittee shall shall notify the Department and must immediately comply with the monitoring requirements provided in the table above.

Table C

Discharge Serial Number: 203-1 | **Monitoring Location: 1**

Wastewater Description: Molding Polymer Clip Washing Wastewaters

Monitoring Location Description: Directly from hose leading from spray rinse machine

Discharge is to: The Town of North Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency [1]	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/ Reporting Frequency[1]	Sample Type or Measurement to be Reported
Flow, Day of Sampling	GPD	NA	2,600	Annually	Daily Flow	NA	NR	NA
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.5-10.5	Annually	Grab

Table Footnotes and Remarks:

Footnotes:

[1] 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'.

Table D

Discharge Serial Number: 204-1 | **Monitoring Location: 1**

Wastewater Description: Laboratory Wastewaters, Main Building

Monitoring Location Description: Directly from Individual laboratory sinks

Discharge is to: The Town of North Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency [1]	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample/ Reporting Frequency[1]	Sample Type or Measurement to be Reported
Copper, Total	mg/l	NA	2.0	Annually	Composite[2]	3.0	NR	NA
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.5-10.5	Annually	RDS[3]
Zinc, Total	mg/l	1.0	2.0	Annually	Composite[2]	3.0	NR	NA

Table Footnotes and Remarks:

Footnotes:

[1] 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'.

[2]The Permittee shall combine a Grab Sample from two separate laboratory sinks to meet the annual sampling requirements contained in Table D.

[3]Range During Sampling means the range of pH from all grab samples used to create a composite sample.

Remarks:

Only secondary rinses are allowed to discharge via the drains. Concentrated solutions and first rinses shall not be disposed of through sinks, but hauled away by a waste hauler permitted under Section 22a-454(a) of the Connecticut General Statutes.

Table E	
Discharge Serial Number: 205-1	**Monitoring Location: 1**
Wastewater Description: Laboratory Wastewaters, Office Building	
Monitoring Location Description: NA – Monitoring not required	
Discharge is to: The Town of North Haven Water Pollution Control Facility	
Only secondary rinses are allowed to discharge via the drains. Concentrated solutions and first rinses shall not be disposed of through sinks, but hauled away by a waste hauler permitted under Section 22a-454(a) of the Connecticut General Statutes.	

Table F	
Discharge Serial Number: 206-1	**Monitoring Location: 1**
Wastewater Description: Laboratory Wastewaters, Needles Manufacturing	
Monitoring Location Description: NA – Monitoring not required	
Discharge is to: The Town of North Haven Water Pollution Control Facility	
Only secondary rinses are allowed to discharge via the drains. Concentrated solutions and first rinses shall not be disposed of through sinks, but hauled away by a waste hauler permitted under Section 22a-454(a) of the Connecticut General Statutes.	

(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.

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 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 received by the Bureau of Materials Management and Compliance Assurance by the last day of the month following the month in which samples are taken.

(D) 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.

(E) DMR Reporting Requirements

1. 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.

    a. Submittal of Reports Using NetDMR

    Unless otherwise approved by the Commissioner, 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(C) of this permit.

    DMRs shall be submitted electronically no later than the thirtieth (30^{th}) 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 and associated attachments 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.

b. 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

c. Submittal of Hard Copy DMRs

If an opt-out request has been submitted to the Department and approved by the Commissioner, the results of chemical analysis required above shall be entered on the DMR, provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance 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

(F) 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.

(G) For Total Toxic Organics (TTO) monitoring, in accordance with section 22a-430-4(l) of the RCSA and 40 CFR 433 (Metal Finishing), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. This certification statement shall be as follows:

"Based on my inquiry of the person or persons responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report which required such certification. I further certify that this facility is implementing the solvent management plan approved by the Commissioner."

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 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. If DMRs are submitted on a monthly basis, this requirement may be fulfilled by submitting the second sample results on the DMR for the month in which the second sample was collected.

(B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("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 1(B) 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 Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

SECTION 7: COMPLIANCE SCHEDULE

(A) The Permittee shall achieve compliance with the effluent limitations in Section 4 as soon as possible but in no event later than 180 days after the effective date of this permit.

(B) On or before 120 days after the effective date of this permit, the Permittee shall submit sampling results* for the treatment system designed for the treatment of Hexavalent Chromium, the treatment system shall be installed in accordance with the approved application for Wastewater Treatment System and Process Modification designated as Application Nos. 201908568 and 201908569 (received by the Department on July 23, 2019, with additional information received on October 4, 2019). The approved application was submitted in accordance with the RCSA 22a-430-3(i)(2) and 22a-430-3(i)(3).

*Sampling results should include:

1. Sampling results for Hexavalent Chromium from the influent to the sump, prior to treatment
2. Sampling results for Hexavalent Chromium from the effluent of the Ion Exchange, after treatment

(C) Dates. The date of submission to the Commissioner of any document required by this section of the permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three (3) days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" as used in this section of the permit means calendar day. Any document or action which is required by this section of the permit to be submitted, or performed, by a date which falls on, Saturday, Sunday, or a Connecticut or federal holiday, shall be submitted or performed on or before the next day which is not a Saturday, Sunday, or Connecticut or federal holiday.

(D) Notification of noncompliance. In the event that the Permittee becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this section of the permit or of any document required hereunder, the Permittee shall immediately notify the Commissioner and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, minimized to the greatest extent possible. In so notifying the Commissioner, the Permittee shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and the Permittee shall comply with any dates, which may be approved in writing by the Commissioner. Notification by the Permittee shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.

(E) Notice to Commissioner of changes. Within fifteen (15) days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this section of the permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the correct or omitted information to the Commissioner.

(F) Submission of documents. Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit shall, unless otherwise specified in writing by the Commissioner, be directed to:

Laura Gaughran, Sanitary Engineer 1
Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

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 (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.

- **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

Yvonne Bolton
Bureau Chief
Bureau of Materials Management and Compliance Assurance

YB/LG

cc: The Town of North Haven Water Pollution Control Facility

Attachment A

Certification: Waiver of Monitoring

"Based on my inquiry of the person or persons directly responsible for managing compliance with the **Pretreatment Standards for New Sources 40 CFR 414.46 Organic Chemicals, Plastics, and Synthetic Fibers**, and with the **Pretreatment Standards for New Sources 40 CFR 433.17**, I certify that, to the best of my knowledge and belief, there has been no increase in the level of Acenaphthene, Anthracene, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroethane, Chloroform, Di-n-butyl phthalate, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethylene, 1,2-trans-Dichloroethylene, 1,2-Dichloropropane, 1,3-Dichloropropylene, Diethyl phthalate, Dimethyl phthalate, 4,6-Dinitro-o-cresol, Ethylbenzene, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Methyl Chloride, Methylene Chloride, Naphthalene, Nitrobenzene, 2-Nitrophenol, 4-Nitrophenol, Phenanthrene, Pyrene, Tetrachloroethylene, Toluene, Total Cyanide, Total Lead, Total Zinc, 1,2,4-Trichlorobenzene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Trichloroethylene, and Vinyl Chloride in the wastewaters for DSN 201, and that there have been no increase in the level of (1) Cadmium, Total, (2) Cyanide, Total, (3) Lead, Total, and (4) Silver, Total in the wastewaters for DSN 202 due to the activities at the facility since filing of the last periodic report under 40 CFR 403.12(e)(2)."

Authorized Official: _____ Title: _____

Signature: _____ Date: _____

COVIDIEN CURRENT PERMIT

PRETREATMENT PERMIT

issued to

United States Surgical
Division of Tyco Healthcare Group LP
195 McDermott Road
North Haven, CT 06473

Location Address:

United States Surgical
Division of Tyco Healthcare Group LP
195 McDermott Road
North Haven, CT 06473

Facility ID: 101-186 **Permit ID:** SP0002026 **Permit Expires:** October 21, 2015

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 (MOA) 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.

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

Section 22a-430-3 General Conditions

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

Section 22a-430-4 Procedures and Criteria

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

(i) Final Determination
(j) Public Hearings
(k) Submission of Plans and Specifications. Approval.
(l) Establishing Effluent Limitations and Conditions
(m) Case by Case Determinations
(n) Permit issuance or renewal
(o) Permit Transfer
(p) Permit revocation, denial or modification
(q) Variances
(r) Secondary Treatment Requirements
(s) Treatment Requirements for Metals and Cyanide
(t) Discharges to POTWs - Prohibitions

(C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars 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 Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least 30 days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.

(F) 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 Regulations of Connecticut State Agencies.

SECTION 2: DEFINITIONS

(A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and section 22a-430-3(a) and 22a-430-6 of the RCSA.

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

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

"Annual" in the context of a sampling frequency, means the sample must be collected in the month of June.

"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.

"Composite" a sample collected over a specified period of time in order that the results are representative of the monitored activity over the same time period. A "Composite Sample" must be comprised of at least two grab samples.

"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 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.

"Month" means the period commencing at 12:00 a.m. on the first day of any calendar month and ending at 12:00 am on the first day of the next calendar month.

"Monthly" means once per month.

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

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

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

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

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

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S DECISION

(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 and further, that the new discharges would protect the waters of the state from pollution. The Commissioner's decision is based on Application No. 200303398 for permit reissuance received on September 24, 2003 and the administrative record established in the processing of that application.

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

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

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

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

Table A

Discharge Serial Number: 201-1 | Monitoring Location: 1

Wastewater Description: Process wastewater from suture manufacturing

Monitoring Location Description: After final pH adjustment tank

Discharge is to: The Town of North Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit[3]	Maximum Daily Limit[3]	Sample/Reporting Frequency [2]	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/ Reporting Frequency[2]	Sample Type or measurement to be reported
Acenaphthene *	ug/l	19.0	47.0	Semi-Annual	daily composite	70.5	NR	NR
Acenaphthene *	gr/d	2.88	7.116	Semi-Annual	daily composite	NA	NR	NR
Anthracene *	ug/l	19.0	47.0	Semi-Annual	daily composite	70.5	NR	NR
Anthracene *	gr/d	2.88	7.116	Semi-Annual	daily composite	NA	NR	NR
Benzene *	ug/l	57.0	NA	NR	NA	134.0	Semi-Annual	Grab
Benzene *	gr/d	8.629	20.288	NR	NA	NA	NR	NR
Bis(2-ethylhexyl)phthalate	ug/l	95.0	258.0	Semi-Annual	daily composite	387.0	NR	NR
Bis(2-ethylhexyl)phthalate	gr/d	14.383	39.06	Semi-Annual	daily composite	NA	NR	NR
Carbon Tetrachloride *	ug/l	142.0	NA	NR	NA	380.0	Semi-Annual	Grab
Carbon Tetrachloride *	gr/d	21.498	57.532	NR	NA	NA	NR	NA
Chlorobenzene *	ug/l	142.0	NA	NR	NA	380.0	Semi-Annual	Grab
Chlorobenzene *	gr/d	21.498	57.532	NR	NA	NA	NR	NA
Chloroethane *	ug/l	110.0	NA	NR	NA	295.0	Semi-Annual	Grab
Chloroethane *	gr/d	16.654	44.663	NR	NA	NA	NR	NR
Chloroform *	ug/l	111.0	NA	NR	NA	325.0	Semi-Annual	Grab
Chloroform *	gr/d	16.805	49.205	NR	NA	NA	NR	NR
Di-n-butyl phthalate *	ug/l	20.0	43.0	Semi-Annual	daily composite	64.5	NR	NR
Di-n-butyl phthalate *	gr/d	3.028	6.510	Semi-Annual	daily composite	NA	NR	NR
1,2-Dichlorobenzene *	ug/l	196.0	NA	NR	NA	794.0	Semi-Annual	Grab
1,2-Dichlorobenzene *	gr/d	29.674	120.21	NR	NA	NA	NR	NR
1,3-Dichlorobenzene *	ug/l	142.0	NA	NR	NA	380.0	Semi-Annual	Grab
1,3-Dichlorobenzene *	gr/d	21.50	57.532	NR	NA	NA	NR	NR
1,4-Dichlorobenzene *	ug/l	142.0	NA	NR	NA	380.0	Semi-Annual	Grab
1,4-Dichlorobenzene *	gr/d	21.50	57.532	NR	NA	NA	NR	NR
1,1-Dichloroethane *	ug/l	22.0	NA	NR	NA	59.0	Semi-Annual	Grab
1,1-Dichloroethane *	gr/d	3.331	8.933	NR	NA	NA	NR	NR
1,2-Dichloroethane *	ug/l	180.0	NA	NR	NA	574.0	Semi-Annual	Grab
1,2-Dichloroethane *	gr/d	27.252	86.903	NR	NA	NA	NR	NR
1,1-Dichloroethylene *	ug/l	22.0	NA	NR	NA	60.0	Semi-Annual	Grab
1,1-Dichloroethylene *	gr/d	3.331	9.084	NR	NA	NA	NR	NR
1,2-trans-Dichloroethylene *	ug/l	25.0	NA	NR	NA	66.0	Semi-Annual	Grab

1,2-trans-Dichloroethylene *	gr/d	3.785	9.992	NR	NA	NA	NR	NR
1,2-Dichloropropane *	ug/l	196.0	NA	NR	NA	794.0	Semi-Annual	Grab
1,2-Dichloropropane *	gr/d	29.674	120.12	NR	NA	NA	NR	NR
1,3-Dichloropropylene *	ug/l	196.0	NA	NR	NA	794.0	Semi-Annual	Grab
1,3-Dichloropropylene *	gr/d	29.674	120.12	NR	NA	NA	NR	NR
Diethyl phthalate *	ug/l	46.0	113.0	Semi-Annual	daily composite	169.5	NR	NR
Diethyl phthalate *	gr/d	6.964	17.108	Semi-Annual	daily composite	NA	NR	NR
Dimethyl phthalate *	ug/l	19.0	47.0	Semi-Annual	daily composite	70.5	NR	NR
Dimethyl phthalate *	gr/d	2.876	7.116	Semi-Annual	daily composite	NA	NR	NR
4,6-Dinitro-o-cresol *	ug/l	78.0	277.0	Semi-Annual	daily composite	415.5	NR	NR
4,6-Dinitro-o-cresol *	gr/d	11.809	41.938	Semi-Annual	daily composite	NA	NR	NR
Ethylacetate	mg/l	NA	NA	NR	NA	-----	Semi-Annual	Grab
Ethylbenzene *	ug/l	142.0	NA	NR	NA	380.0	Semi-Annual	Grab
Ethylbenzene *	gr/d	21.498	57.532	NR	NA	NA	NR	NA
Flow, Average Daily	gpd	40,000	NA	continuous/monthly	See Footnotes	NA	NR	NA
Flow, Maximum [1]during 24-hour period	gpd	NA	80,000	continuous/monthly	See Footnotes	NA	NR	NA
Flow, Total (Day of Sampling)	gpd	NA	80,000	Semi-Annual	daily flow	NA	NR	NA
Fluoranthene *	ug/l	22.0	54.0	Semi-Annual	daily composite	81.0	NR	NR
Fluoranthene *	gr/d	3.331	8.176	Semi-Annual	daily composite	NA	NR	NR
Fluorene *	ug/l	19.0	47.0	Semi-Annual	daily composite	70.5	NR	NR
Fluorene *	gr/d	2.877	7.116	Semi-Annual	daily composite	NA	NR	NR
Formaldehyde	mg/l	NA	-----	Semi-Annual	daily composite	NA	NR	NR
Hexachlorobenzene *	ug/l	196.0	794.0	Semi-Annual	daily composite	1191.0	NR	NR
Hexachlorobenzene *	gr/d	29.674	120.21	Semi-Annual	daily composite	NA	NR	NR
Hexachlorobutadiene *	ug/l	142.0	380.0	Semi-Annual	daily composite	570.0	NR	NR
Hexachlorobutadiene *	gr/d	21.499	57.532	Semi-Annual	daily composite	NA	NR	NR
Hexachloroethane *	ug/l	196.0	794.0	Semi-Annual	daily composite	1191.0	NR	NR
Hexachloroethane *	gr/d	29.674	120.21	Semi-Annual	daily composite	NA	NR	NR
Methyl Chloride *	ug/l	110.0	NA	NR	NA	295.0	Semi-Annual	Grab
Methyl Chloride *	gr/d	16.654	44.66	NR	NA	NA	NR	NA
Methylene Chloride *	ug/l	36.0	NA	NR	NA	170.0	Semi-Annual	Grab
Methylene Chloride *	gr/d	5.450	25.74	NR	NA	NA	NR	NA
Naphthalene *	ug/l	19.0	47.0	Semi-Annual	daily composite	70.5	NR	NR
Naphthalene *	gr/d	2.876	7.116	Semi-Annual	daily composite	NA	NR	NR
Nitrobenzene *	ug/l	2,237.0	6,402.0	Semi-Annual	daily composite	9603.0	NR	NR
Nitrobenzene *	gr/d	338.68	969.26	Semi-Annual	daily composite	NA	NR	NR
2-Nitrophenol *	ug/l	65.0	231.0	Semi-Annual	daily composite	346.5	NR	NR
2-Nitrophenol *	gr/d	9.841	34.97	Semi-Annual	daily composite	NA	NR	NR
4-Nitrophenol *	ug/l	162.0	576.0	Semi-Annual	daily composite	864.0	NR	NR
4-Nitrophenol *	gr/d	24.526	87.206	Semi-Annual	daily composite	NA	NR	NR
Oil & Grease, hydrocarbon, total petroleum	mg/l	NA	NR	NR	NA	100.0	Semi-Annual	Grab

pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 – 10.0	Semi-Annual	RDS
pH, Continuous	S.U.	NA	NA	NR	NA	6.0 – 10.0	continuous/monthly	RDM
Phenanthrene *	ug/l	19.0	47.0	Semi-Annual	daily composite	70.5	NR	NR
Phenanthrene *	gr/d	2.877	7.116	Semi-Annual	daily composite	NA	NR	NR
Pyrene *	ug/l	20.0	48.0	Semi-Annual	daily composite	72.0	NR	NR
Pyrene *	gr/d	3.028	7.267	Semi-Annual	daily composite	NA	NR	NR
Suspended Solids, Total	mg/l	NA	-----	Semi-Annual	daily composite	NA	NR	NR
Tetrachloroethylene *	ug/l	52.0	NA	NR	NA	164.0	Semi-Annual	Grab
Tetrachloroethylene *	gr/d	7.873	24.830	NR	NA	NA	NR	NR
Tin	ug/l	NA	-----	Semi-Annual	daily composite	NA	NR	NR
Toluene *	ug/l	NA	NA	NR	NA	74.0	Semi-Annual	Grab
Toluene *	gr/d	NA	11.204	NR	NA	NA	NR	NR
Total Cyanide *	ug/l	420.0	NA	NR	NA	1,200.0	Semi-Annual	Grab
Total Cyanide *	gr/d	63.588	181.68	NR	NA	NA	NR	NR
Total Lead *	ug/l	320.0	690.0	Semi-Annual	daily composite	1035.0	NR	NR
Total Lead *	gr/d	48.448	104.467	Semi-Annual	daily composite	NA	NR	NR
Total Zinc *	ug/l	1,050.0	2,610.0	Semi-Annual	daily composite	3915.0	NR	NR
Total Zinc *	gr/d	158.97	395.154	Semi-Annual	daily composite	NA	NR	NR
1,2,4-Trichlorobenzene *	ug/l	196.0	794.0	Semi-Annual	daily composite	1191.0	NR	NR
1,2,4-Trichlorobenzene *	gr/d	29.674	120.211	Semi-Annual	daily composite	NA	NR	NR
1,1,1-Trichloroethane *	ug/l	22.0	NA	NR	NA	59.0	Semi-Annual	Grab
1,1,1-Trichloroethane *	gr/d	3.331	8.933	NR	NA	NA	NR	NR
1,1,2-Trichloroethane *	ug/l	32.0	NA	NR	NA	127.0	Semi-Annual	Grab
1,1,2-Trichloroethane *	gr/d	4.845	19.228	NR	NA	NA	NR	NR
Trichloroethylene *	ug/l	26.0	NA	NR	NA	69.0	Semi-Annual	Grab
Trichloroethylene *	gr/d	3.936	10.447	NR	NA	NA	NR	NR
Vinyl Chloride *	ug/l	97.0	NA	NR	NA	172.0	Semi-Annual	Grab
Vinyl Chloride *	gr/d	14.685	26.041	NR	NA	NA	NR	NR

Table A Footnotes and Remarks;

Footnotes:

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

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

[3] For instantaneous limits written as mass (gr/d) the Permittee shall calculate the mass to be reported by using the instantaneous grab sample concentration multiplied by the total daily flow for the day of sample collection.

Permit terms and conditions

* Although the noted pollutants are regulated chemicals included in the federal wastewater discharge category associated with this facility (40 CFR 414) the Permittee is hereby authorized to forego sampling for these parameters in accordance with section 40 CFR 403.12(e)(2) of the federal regulations. Consistent with this section of the regulations, the Permittee shall include a statement on each Discharge Monitoring Report (DMR), on a form provided (Attachment A), certifying there has been no increase in the levels of the noted pollutants due to the activities at the facility since filing of the last DMR. Additionally, in the event that any of these chemical parameters are found to be present or are expected to be present based on changes that occur in the Permittee's operations, the Permittee shall notify the Department and must immediately comply with the monitoring requirements provided in the table above.

Table B

Discharge Serial Number: 202-1 | **Monitoring Location:** 1

Wastewater Description: Chemical etch, cleaning, electropolishing, pickling, tumbling and cleaning of surgical needles and biosurgery barriers and sealants wastewaters

Monitoring Location Description: after pH adjustment system

Discharge is to: The Town of North Haven Water Pollution Control Facility

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	Sample Type or measurement to be reported
Cadmium, Total *	mg/l	0.07	0.11	Semi-annual	daily composite	0.165	NR	NA
Chromium, Total	mg/l	1.0	2.0	Monthly	daily composite	3.0	NR	NA
Copper, Total	mg/l	1.0	2.0	Monthly	daily composite	3.0	NR	NA
Cyanide, Total *	mg/l	0.65	1.2	Semi-annual	daily composite	1.8	NR	NA
Flow, Average and Maximum Daily[1]	gpd	-----	6,000	continuous	See Remarks	NA	NR	NA
Flow, Total Day of Sampling[1]	gpd	NA	6,000	Monthly	daily flow	NA	NR	NA
Lead, Total *	mg/l	0.1	0.5	Monthly	daily composite	0.75	NR	NA
Nickel, Total	mg/l	1.0	2.0	Monthly	daily composite	3.0	NR	NA
pH, Day of Sampling	SU	NA	NA	NR	NA	6.0 10.0	Monthly	RDS
pH, Continuous	S.U.	NA	NA	NR	NA	6.0 – 10.0	continuous	RDM
Silver, Total *	mg/l	0.1	0.43	Semi-annual	daily composite	0.645	NR	NA
Zinc, Total	mg/l	1.0	2.0	Monthly	daily composite	3.0	NR	NA
Total Toxic Organics	mg/l	NA	NA	NR	NA	2.13	Monthly	Grab

Table B Footnotes and Remarks:

Footnotes

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

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

Remarks:

* Although Cadmium, Total, Cyanide, Total, Lead, Total and Silver, Total are regulated chemicals included in the federal wastewater discharge category associated with this facility (40 CFR 414) the Permittee is hereby authorized to forego sampling for these parameters in accordance with section 40 CFR 403.12(e)(2) of the federal regulations. Consistent with this section of the regulations, the Permittee shall include a statement on each Discharge Monitoring Report (DMR), on a form provided (Attachment A), certifying there has been no increase in the levels of Cadmium, Total, Cyanide, Total, Lead, Total and Silver, Total due to the activities at the facility since filing of the last DMR. Additionally, in the event that any of these chemical parameters are found to be present or are expected to be present based on changes that occur in the Permittee's operations, the Permittee shall notify the Department and must immediately comply with the monitoring requirements provided in the table above.

Table C

Discharge Serial Number: 203-1 | **Monitoring Location:** 1

Wastewater Description: Molding Polymer Clip Washing Wastewaters

Monitoring Location Description: Directly from discharge hose leading from spray rinse machine

Discharge is to: The Town of North Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency[1]	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency	Sample Type or measurement to be reported
Copper, Total	mg/l	NA	NA	NR	NA	3.0	Annual	Grab
Flow. Total Day of Sampling	gpd	NA	2.600	Annual	daily flow	NA	NR	NA
pH, Day of Sampling	SU	NA	NA	NR	NA	5.5 – 10.5	Annual	Grab
Zinc, Total	mg/l	NA	NA	NR	NA	3.0	Annual	Grab

Table Footnotes:

[1] 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'.

Table D

Discharge Serial Number: 204-1 | Monitoring Location: 1

Wastewater Description: Laboratory Wastewaters, Main Building

Monitoring Location Description: Directly from individual laboratory sinks

Discharge is to: The Town of North Haven Water Pollution Control Facility

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency[1]	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency	Sample Type or measurement to be reported
Copper, Total	mg/l	NA	2.0	Annual	Composite[2]	3.0	NR	NA
pH, Day of Sampling	SU	NA	NA	NR	NA	5.5 – 10.5	Annual	RDS[3]
Zinc, Total	mg/l	1.0	2.0	Annual	Composite[2]	3.0	NR	NA

Table Footnotes:

[1] 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'.

[2] The permittee shall combine a grab sample from two (2) separate laboratory sinks to meet the annual sampling requirements contained in Table D.

[3] Range During Sampling means the range of pH from all grab samples used to create a composite sample.

Remarks:

Only secondary rinses are allowed to discharge via the drains. Concentrated solutions and first rinses shall not be disposed of through sinks, but hauled away by a waste hauler permitted under Section 22a-454(a) of the Connecticut General Statutes.

Table E	
Discharge Serial Number: 205-1	**Monitoring Location:** 1
Wastewater Description: Laboratory Wastewaters, Office Building	
Monitoring Location Description: NA Monitoring not required	
Only secondary rinses are allowed to discharge via the drains. Concentrated solutions and first rinses shall not be disposed of through sinks, but hauled away by a waste hauler permitted under Section 22a-454(a) of the Connecticut General Statutes.	

Table F	
Discharge Serial Number: 206-1	**Monitoring Location:** 1
Wastewater Description: Laboratory Wastewaters, Needle Manufacturing	
Monitoring Location Description: NA – Monitoring not required	
Only secondary rinses are allowed to discharge via the drains. Concentrated solutions and first rinses shall not be disposed of through sinks, but hauled away by a waste hauler permitted under Section 22a-454(a) of the Connecticut General Statutes.	

(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 Environmental Protection personnel, the Permittee, or other parties.

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

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

SECTION 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 employ 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.

(B) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR136 unless otherwise specified.

(C) The results of chemical analysis required above shall be entered on the Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Materials Management and Compliance Assurance at the following address. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at this address by the last day of the month following the month in which samples are taken.

Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division (Attn: DMR Processing)
Connecticut Department of 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, 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.

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

(F) For any table above that requires Total Toxic Organics (TTO) monitoring, the Permittee may, in lieu of analyzing for Total Toxic Organics, include a statement on the DMR, at the frequency required, certifying compliance with your Solvent Management Plan if such plan has been approved by the Commissioner in accordance with 22a-430-4(l) of the RCSA and by 40 CFR 433 (Metal Finishing). If such approval has been granted and the reports include the compliance statement sampling for Total Toxic Organics is no longer a requirement of this permit. The Solvent Management Plan was approved on April 7, 2009.

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 Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing) within 30 days of the exceedance.

(B) The Permittee shall immediately notify the Bureau of Materials Management and Compliance Assurance and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("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 Bureau of Materials Management and Compliance Assurance within 24 hours of becoming aware of the violation.

SECTION 7: COMPLIANCE CONDITIONS

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 months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee 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 or more of all measurements taken during a six-month period exceed the Average Monthly or Maximum Daily Limit(s) for the same pollutant parameter.

- **Technical Review Criteria violations:** Those in which 33% or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the average or maximum daily limits multiplied by (1.4 for BOD, TSS, oil and grease) or (1.2 for all other pollutants except pH).

- **Compliance Schedule:** Failure to meet within 90 days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit.

- **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 pollutant(s) that has caused imminent endangerment to human health, welfare or to the environment.

This permit is hereby issued on October 22, 2010

/s/AMEY W. MARRELLA
Amey W. Marrella
Commissioner

AM/OB

cc: Town of North Haven Water Pollution Control Facility

Certification: Waiver of Monitoring

Attachment A

"Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for Existing Sources **40 CFR 414.45 Organic Chemicals, Plastics, and Synthetic Fibers** and with the **Pretreatment Standards for Existing Sources 40 CFR 433.15 Metal Finishing Point Source,** I certify that, to the best of my knowledge and belief, there has been no increase in the level of Acenaphthene, Anthracene, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroethane, Chloroform, Di-n-butyl phthalate, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethylene, 1,2-trans-Dichloroethylene, 1,2-Dichloropropane, 1,3-Dichloropropylene, Diethyl phthalate, Dimethyl phthalate, 4,6-Dinitro-o-cresol, Ethylbenzene, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Methyl Chloride, Methylene Chloride, Naphthalene, Nitrobenzene, 2-Nitrophenol, 4-Nitrophenol, Phenanthrene, Pyrene, Tetrachloroethylene, Toluene, Total Cyanide, Total Lead, Total Zinc, 1,2,4-Trichlorobenzene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, Trichloroethylene and Vinyl Chloride in the wastewaters for DSN 201, and that there has been no increase in the level of Cadmium-Total, Cyanide-Total, Lead-Total and Silver-Total in the wastewaters for DSN 202 due to the activities at the facility since filing of the last periodic report under 40 CFR 403.12(e)(i)."

Authorized Official : _____ **Title:** _____

Signature:_____ **Date:**_____

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: United States Surgical, Division of Tyco Healthcare Group LP

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0002026 APPLICATION #:200303398 FACILITY ID. 101-186

Mailing Address:	Location Address:
Street: 195 McDermott Road	Street: same
City: North Haven ST: CT Zip: 06473	City: ST CT Zip:
Contact Name: Steve Burke	**DMR Contact** William Richardson
Phone No.: (203) 492-7188	Phone No.: (203) 492-7188

PERMIT INFORMATION

DURATION 5 YEAR _x_ 10 YEAR ___ 30 YEAR

TYPE New _ Reissuance _x_ Modification

CATEGORIZATION POINT (x) NON-POINT ( ) GIS # 13253

NPDES ( ) PRETREAT (x) GROUND WATER(UIC) ( ) GROUND WATER (OTHER) ( )

NPDES MAJOR(**MA**) ___
NPDES SIGNIFICANT MINOR or PRETREAT SIU (**SI**) _x
NPDES or PRETREATMENT MINOR (**MI**)

PRETREAT SIGNIFICANT INDUS USER(**SIU**) _x
PRETREAT CATEGORICAL (**CIU**) _x
Note: If it's a CIU then check off SIU

POLLUTION PREVENTION MANDATE _ ENVIRONMENTAL EQUITY ISSUE

COMPLIANCE ISSUES

COMPLIANCE SCHEDULE YES NO x (If yes check off what it is in relation to.)

POLLUTION PREVENTION ___ TREATMENT REQUIREMENT____WATER CONSERVATION

WATER QUALITY REQUIREMENT __ REMEDIATION __ OTHER _____

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

OWNERSHIP CODE

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

DEP STAFF ENGINEER Olimpia Brucato

PERMIT FEES

Discharge Code	DSN Number	Annual Fee
501042Z	DSN 201	$8,425.00
501035Y	DSN 202	$4,337.50
501035Y	DSN 203	$0
501032Y	DSN 204	$660.00
501032Y	DSN 205	$0
501032Y	DSN 206	$0
	Total	$13,442.50

FOR SEWER DISCHARGES
Discharge to The Town of North Haven Water Pollution Control Facility via its collection system. The facility ID. of the POTW is 101-001.

NATURE OF BUSINESS GENERATING DISCHARGE
Discharges are generated from the production of synthetic bioabsorbable polymer and surgical sutures and stainless steel needles.

PROCESS AND TREATMENT DESCRIPTION (by DSN)
DSN 201 - 80,000 gpd of process wastewater from suture manufacturing are treated by pH adjustment.
DSN 202 - 6,000 gpd of chemical etch, cleaning, electropolishing, pickling, tumbling and cleaning of surgical needles and biosurgery barriers and sealants wastewaters are treated by pH adjustment.
DSN 203 - 2,600 gpd of molding polymer clip washing wastewaters, treatment not necessary.
DSN 204 - 3,400 gpd of laboratory wastewaters, treatment is not necessary. Laboratory consists of quality assurance complaint investigation instrument sterilization and field returns.
DSN 205 - 300 gpd of laboratory wastewaters, treatment is not necessary.
DSN 206 - 100 gpd of laboratory wastewaters, treatment is not necessary.

RESOURCES USED TO DRAFT PERMIT

X Federal Effluent Limitation Guideline 40 CFR § 414.45 (DSN 201)
PART 414—ORGANIC CHEMICALS, PLASTICS, AND SYNTHETIC FIBERS
The company indicated Thermoplastic Resins 40CFR 414
Subpart D - Thermoplastic Resins
§414.45, Pretreatment standards for existing sources (PSES) (directs to 414.111)
"Except as provided in 40 CFR 403.7 and 403.13, any existing source subject to this subpart which introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve discharges in accordance with §414.111."
§414.111, Toxic pollutant standards for indirect discharge point sources
(lists the 45 parameters)

X Federal Effluent Limitation Guideline 40 CFR § 433.15 (DSN 202)
Part 433-Metal Finishing Point Source (PSES)
Subpart A, §433.15

__ Performance Standards

__ Federal Development Document
name of category

__ Treatability Manual

__ Department File Information

__ Connecticut Water Quality Standards

__ Anti-degradation Policy

_x_ Coastal Management Consistency Review Form (See Other Comments)
Not required because no construction was done at the site outside the facility.

__ Other – Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

_x_ Pretreatment Standards for Existing Sources (PSES)
DSN 201 – §414.45, OCPSF -all 45 parameters listed under §414.111 for the average monthly limit and maximum daily limit
DSN 202 – §433.15 cadmium, chromium, copper, cyanide, lead, nickel, zinc for the average monthly limit and maximum daily limit. TTO (instantaneous limit), silver (maximum daily)

_X_ Best Professional Judgment and a Case-by-Case Determination
DSN 201 – ethylacetate, formaldehyde, total suspended solids, tin, pH, oil & grease-HC fraction
DSN 202 – pH
DSN 203 – copper, zinc, pH
DSN 204 – copper, zinc, pH
DSN 205 – no monitoring
DSN 206 – no monitoring
Note: Based on the data submitted, pollutants were not expected to be present for DSN's 203, 204, 205, 206.

_X_ Section 22a-430-4(s) of the Regulations of Connecticut State Agencies
DSN 202 – silver (average monthly)

GENERAL COMMENTS

DSN 203 was formerly discharged under the Tumbling and Cleaning General Permit and was added to this permit. It was decided that it fell under the metal finishing category after conversations with EPA. In developing the permit's concentration limits, EPA Metal Finishing Categorical Limits (40 CFR Part 433) and Section 22a-430-4(s)(2) of the Regulations of Connecticut State Agencies limits were compared. The Connecticut limits were found to be more stringent and thus incorporated in the permit.

Tin was reduced to semi-annual because discharge monitoring reports indicated that it was non-detect. Oil & Grease, Hydrocarbon Fraction limit was raised from 99.0 mg/l to 100.0 mg/l to be consistent with Oil & Grease, Hydrocarbon Fraction limits for pretreatment discharges to sanitary sewer.

EPA's General Pretreatment Streamlining Regulations for Existing and New Sources of Pollution, Section §403.8(f)(1)(iii)(B)(4) and §403.12(e), authorizes the Control Authority to waive permit monitoring requirements for pollutants that are not present and/or used anywhere in the Permittee's facility, but are included in the respective federal category. The Control Authority may authorize the Industrial User subject to a categorical Pretreatment Standard to forego sampling of a pollutant regulated by a categorical Pretreatment Standard if the Industrial User has demonstrated through sampling and other technical factors that the pollutant is neither present nor expected to be present in the discharge, or is present only at background levels from intake water and without any increase in the pollutant due to activities of the Industrial User. Per 40 CFR §403.12(e)(2)(iii), in making a demonstration that a pollutant is not present, the Industrial User must provide data from at least one sampling of the facility's process wastewater prior to any treatment present at the facility that is representative of all wastewater from all processes.

United States Surgical, Division of Tyco Healthcare Group LP fulfilled this requirement and demonstrated, using an EPA approved method from 40 CFR Part 136, that forty-four (44) of the forty-five (45) pollutants for DSN 201-1 (OCPSCF, §414.45) and that four (4) out of eight (8) pollutants for DSN 202-1 (Metal Finishing, §433.15) were neither present nor expected to be present in the discharge by providing the analytical data in a submittal dated May 6, 2009 from at least one sampling of the facility's process wastewater (prior to any treatment present at the facility) that was representative of all wastewater from all processes.

For DSN 201-1, the sample was analyzed for all forty-five (45) regulated chemicals listed under §414.111. For DSN 202-1, the sample was analyzed for four (4) of the 8 (eight) regulated chemicals listed under §433.15 based on the most sensitive EPA approved method. As a result, DEP staff is recommending that United States Surgical, Division of Tyco Healthcare Group LP be authorized to forego sampling of the aforementioned chemicals listed under the respective category and relevant discharge.

Per 40 CFR 403.12(e)(2)(ii), the monitoring waiver is valid only for the duration of the effective period of the permit or other equivalent individual control mechanism, but in no case longer than 5 years. The User must submit a new request for the waiver before the waiver can be granted for each subsequent control mechanism.

The Industrial User must provide data from at least one sampling of the facility's process wastewater prior to any treatment present at the facility that is representative of all wastewater from all processes, per 40 CFR 403.12(e)(2)(iii). United States Surgical, Division of Tyco Healthcare Group LP demonstrated this in a submittal dated May 6, 2009.

The request for a monitoring waiver must be signed by a principal executive officer, ranking elected official or other duly authorized employee) and include the certification statement in §403.6(a)(2)(ii). Non-detectable sample results may only be used as a demonstration that a pollutant is not present if the EPA approved method from 40 CFR Part 136 with the lowest minimum detection level for that pollutant was used in the analysis. On June 15, 2010, Steven Burke, Principle Environmental, Health and Safety Engineer of United States Surgical, Division of Tyco Healthcare Group LP submitted in writing a Signatory Responsibility Registration form appointing him duly authorized to sign and submit such reports. The certification statement is as follows:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Per 40 CFR 403.12(e)(2)(iv), any granting of the monitoring waiver by the Control Authority must be included as a condition in the User's control mechanism. The reasons supporting the waiver and any information submitted by the User in its request for the waiver must be maintained by the Control Authority for 3 years after expiration of the waiver.

Per 40 CFR 403.12(e)(2)(v) upon approval of the monitoring waiver and revision of the User's control mechanism by the Control Authority, the Industrial User must certify on each report with the statement below, that there has been no increase in the pollutant in its wastestream due to activities of the Industrial User:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for 40 CFR _____ [specify applicable National Pretreatment Standard part(s)], I certify that, to the best of my knowledge and belief, there has been no increase in the level of _____ [list pollutant(s)] in the wastewaters due to the activities at the facility since filing of the last periodic report under 40 CFR 403.12 (e)(1)."

Per 40 CFR 403.12(e)(2)(vi). In the event that a waived pollutant is found to be present or is expected to be present based on changes that occur in the User's operations, the User must immediately: Comply with the monitoring requirements of paragraph 40 CFR 403.12 (e)(1) of this section [§ 403.12, Reporting requirements for POTW's and industrial users] or other more frequent monitoring requirements imposed by the Control Authority; and notify the Control Authority. In this case, the Permittee shall immediately notify the Department of such circumstances and begin monitoring for such pollutants as required in Table A and Table B.

Consistent with section 403.12(e)(2) of the regulations, the Permittee shall include a statement, as an attachment, on each Discharge Monitoring Report (DMR), certifying that with the Pretreatment Standard for Existing Sources 40 CFR 414.45 Organic Chemicals, Plastics, and Synthetic Fibers there has been no increase in the levels of Acenaphthene, Anthracene, Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroethane, Chloroform, Di-n-butyl phthalate, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,1-Dichloroethane, 1,2-Dichloroethane, 1,1-Dichloroethylene, 1,2-trans-Dichloroethylene, 1,2-Dichloropropane, 1,3-Dichloropropylene, Diethyl phthalate, Dimethyl phthalate, 4,6-Dinitro-o-cresol, Ethylbenzene, Fluoranthene, Fluorene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Methyl Chloride, Methylene Chloride, Naphthalene, Nitrobenzene, 2-Nitrophenol, 4-Nitrophenol, Phenanthrene, Pyrene, Tetrachloroethylene, Toluene, Total Cyanide, Total Lead, Total Zinc, 1,2,4-Trichlorobenzene, 1,1,1-Trichloroethane,

1,1,2-Trichloroethane, Trichloroethylene and Vinyl Chloride in the wastewaters for DSN 201, or with the Pretreatment Standard for Existing Sources 40 CFR 433.15 Metal Finishing Point Source, there has been no increase in the level of Cadmium-Total, Cyanide-Total, Lead-Total and Silver-Total for DSN 202 due to the activities at the facility since filing of the last DMR.

COVIDIEN CURRENT PERMIT VIOLATIONS LOG

Violation Report Majors

UNITED STATES SURGICAL, DIVISION OF TYCO HEALTHCARE GROUP LP

2011

End Date	Param	Parameter Desc	Loc	Type	Stat Base Code	Limit Value	DMR Value	Units	Vio Code
05/31/2015	61941	pH, maximum	1	C3	INST MAX	10.5000	10.7000	SU	E90
12/31/2018	39100	Di[2-ethylhexyl] phthalate [DEHP]	1	C2	MO AVG	95.0000	97.0000	ug/L	E90

2021

End Date	Param	Parameter Desc	Loc	Type	Stat Base Code	Limit Value	DMR Value	Units	Vio Code
12/31/2016	01027	Cadmium, total [as Cd]	1	C2	MO AVG	0.0700	0.2800	mg/L	E90
12/31/2016	01027	Cadmium, total [as Cd]	1	C3	DAILY MX	0.1100	0.2800	mg/L	E90
12/31/2016	01051	Lead, total [as Pb]	1	C2	MO AVG	0.1000	0.1200	mg/L	E90
03/31/2018	01034	Chromium, total [as Cr]	1	C2	MO AVG	1.0000	1.2000	mg/L	E90
08/31/2018	01034	Chromium, total [as Cr]	1	C2	MO AVG	1.0000	2.1000	mg/L	E90
08/31/2018	01034	Chromium, total [as Cr]	1	C3	DAILY MX	2.0000	2.1000	mg/L	E90
08/31/2018	01067	Nickel, total [as Ni]	1	C2	MO AVG	1.0000	1.2000	mg/L	E90