

UIC PERMIT

Issued to

Hilltop Inn Suites, LLC
373 Norwich-Westerly Road
North Stonington, CT 06359

Location Address:
Hilltop Inn & Suites
373 Norwich-Westerly Road
North Stonington, CT

Permit ID: UI0000346
Watershed: Shunock River
Basin Code: 1004

Issuance Date:
Effective Date: [Renewals: 1st day of next month]
Expiration Date: [10 years from Effective Date]

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued in accordance with section 1421 of the Federal Safe Drinking Water Act 42 USC 300h et. seq., section 22a-430 of Chapter 446k, Connecticut General Statutes (“CGS”), and Regulations of Connecticut State Agencies (“RCSA”) adopted thereunder, as amended.
- (B) Hilltop Inn Suites, LLC (“Permittee”) shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsection (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(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 to Comply
- (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.
- (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-157 of the CGS.
- (E) The Permittee shall comply with Section 22a-416-1 through Section 22a-416-10 of the RCSA concerning operator certification.
- (F) No provision of this permit and no action or inaction by the Commissioner of Energy & Environmental Protection ("Commissioner") shall be construed to constitute an assurance by the Commissioner that the actions taken by the Permittee pursuant to this permit will result in compliance or prevent or abate pollution.
- (G) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner. To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least 30 days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure, by the transferee, to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (H) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (I) 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:
- “Average Monthly Limit” means the highest allowable average of all grab samples taken during any calendar month.
- “Maximum Concentration”, in the context of this permit, is defined as the maximum concentration at any time as determined by a grab sample.
- “Quarterly”, in the context of a sampling frequency, shall mean sampling is required during each calendar quarter ending on the last day of March, June, September and December.
- “Range During Month” or “RDM” means the lowest and the highest values of all of the monitoring data for the reporting month.
- “3 times per year”, in the context of a maintenance frequency, shall mean the maintenance must be performed at least 3 times during the period of May to November.
- “Twice per month”, when used as a sample frequency, shall mean two samples per calendar month collected no less than 12 days apart.
- “Twelve Month Rolling Average”, means the average monthly concentration of the current month’s samples averaged with the average monthly concentration from each of the previous eleven months.

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. The Commissioner's decision is based on **Application No. 201205837** for permit reissuance received on August 7, 2012 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 ten years and until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge a maximum flow of 13,920 gallons per day of domestic sewage in accordance with the terms and conditions of this permit, the above referenced application, and all modifications and approvals issued by the Commissioner or the Commissioner’s authorized agent for the discharges and/or activities authorized by, or associated with, this permit 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 Safe Drinking 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 Safe Drinking Water Act or Connecticut General Statutes or regulations adopted thereunder, which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The use of any sewage system additive as defined in section 22a-460(g) of the CGS is prohibited unless such additive complies with section 22a-461 of the CGS. The Commissioner in no way certifies the safety or effectiveness of any sewage system additive.
- (B) Oils, greases, industrial or commercial wastes, toxic chemicals, or other substances that will adversely affect the operation of the subsurface sewage treatment and disposal system, or, which may pollute ground or surface water, shall not be discharged to the subsurface sewage treatment and disposal system.
- (C) The Permittee shall assure that groundwater affected by the subject discharge shall conform to the Connecticut Water Quality Standards.
- (D) The Permittee shall operate and maintain all processes as installed in accordance with the approved plans and specifications and as outlined in the associated operation and maintenance manual. This includes but is not limited to all aeration equipment, aeration tank cycling, mixing equipment, anoxic tanks, chemical feed systems, effluent filters, and UV disinfection. The Permittee shall neither bypass nor fail to operate any of the approved equipment or processes without the written approval of the Commissioner.
- (E) The discharge shall not exceed and shall otherwise conform to the specific terms and conditions listed in this permit. The discharge is restricted by and shall be monitored in accordance with Tables (A) through (C), which are incorporated into this permit as Attachment 1.
- (F) The pH of the discharge shall not be less than 6.0 nor greater than 9.0 Standard Units at any time and shall be monitored in accordance with this permit. The Permittee shall report pH values, specifically maximum and minimum, for each day of sample collection.
- (G) The Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report on the discharge monitoring report the total flow and number of hours of discharge for the day of sample collection and the average daily flow for each sampling month.
- (H) 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.
- (I) 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.
- (J) Unless a different classification of certified operator is required under a separate written approval issued by the Commissioner, the Permittee shall ensure that the wastewater treatment facility is operated by a person with a valid and effective certification in the State of Connecticut, at a minimum, as a facility Class 3 operator pursuant to C.G.S. 22a-416(d) and the regulations adopted thereunder. The Permittee shall ensure that the wastewater treatment facility is operated by such an operator with such qualifications throughout the entire life of the wastewater treatment facility.
- (K) The Permittee shall monitor, inspect and maintain the treatment facilities in accordance with Table (D), which is incorporated into this permit as Attachment 2.
- (L) The Permittee shall perform groundwater monitoring in accordance with Table (E), which is incorporated into this permit as Attachment 3.

- (M) The monitoring and sampling required within this permit is the minimum for reporting purposes only. More frequent monitoring and sampling of the treatment system may be required to operate the facility to obtain acceptable results for the parameters being monitored as required by the Operation and Maintenance Manual approved by the Commissioner.

SECTION 5: SAMPLE COLLECTION AND HANDLING, 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) 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 shall be reported to the Commissioner within 30 days of the exceedance. Resampling for a permit violation is in addition to routine required sampling.
- (C) The Permittee shall enter the results of chemical analysis and treatment facilities monitoring and maintenance required by Section 4 on a Discharge Monitoring Report (DMR) provided by this office and shall submit such DMR 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 each violation of the limitations specified, the corrective actions performed, and a schedule for completing any necessary remaining corrective action. The DMR shall be received at this address by the last day of the month following the month in which the samples are taken.

**Attn: DMR Processing
Connecticut 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**

- (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) NetDMR Reporting Requirements:
Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may report all chemical analysis, monitoring and maintenance 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 discharge monitoring reports (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 thirty (30) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's discharge monitoring reports ("Signatory Authority") as described in RCSA Section 22a-430-3(b)(2) shall contact the Department at deep.netdmr@ct.gov and initiate the NetDMR subscription process for electronic submission of Discharge Monitoring Report (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 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 electronically submit DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement in paragraph (C) of this Section of this permit. DMRs shall be submitted electronically to the Department no later than the last 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 to the Department. The Permittee shall also electronically file any written report of non-compliance described in paragraph (B) of this Section and in the following Section of this Permit as an attachment in NetDMR. NetDMR is accessed from:
<https://netdmr.epa.gov/netdmr/public/home.htm>.

(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 a 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
Bureau of Materials Management and Compliance Assurance
Water Permitting and Enforcement Division
79 Elm Street
Hartford, CT 06106-5127

(d) Non-Electronic or Hard-Copy Submission:

The results of chemical analysis and treatment facilities monitoring that are not required to be submitted electronically under Section 5 shall be submitted in hard-copy form on a DMR. Such DMRs and other reports not required to be submitted electronically shall be reported to the Bureau of Materials Management and Compliance Assurance at the following address.

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

- (e) Copies of all hard-copy DMRs shall be submitted concurrently to the local Health Department.
- (f) Copies of all hard-copy DMRs shall be submitted concurrently to the local Water Pollution Control Authority (hereinafter "WPCA").

SECTION 6: COMPLIANCE SCHEDULE

- (A) On or before thirty (30) days after issuance of this permit, the Permittee shall record on the land records of the Town of North Stonington a document indicating the location of the zone of influence created by the subject discharge, as reflected in the application and approved plans and specifications for this permit. On or before one (1) month after such recording, the Permittee shall submit written verification to the Commissioner that the approved document indicating the location of the zone of influence created by the subject discharge as reflected in the application for this permit has been recorded on the land records in the Town of North Stonington.
- (B) On or before thirty (30) days after issuance of this permit, the Permittee shall record a copy thereof on the land records in the Town of North Stonington. On or before one (1) month after such recording, the Permittee shall submit written verification to the Commissioner that this permit has been recorded on the land records in the Town of North Stonington.
- (C) Every two (2) years, on or before the anniversary date of the issuance of this permit, the Permittee shall submit the results of a detailed permit compliance audit to the Commissioner. Such audits shall be performed within sixty (60) days prior to the anniversary date. The compliance audits shall be performed by a qualified professional engineer licensed to practice in Connecticut with the appropriate education, experience and training that is relevant to the work required.

Each audit shall evaluate compliance with all permit terms and conditions for the preceding two-year period. The evaluation shall review all pertinent records and documents as necessary, including Discharge Monitoring Reports (DMRs), laboratory reports, operations and maintenance plans, performance logs/records, equipment specifications, maintenance schedules, engineering drawings, and spare parts inventory.

Each audit report shall include a description of all records and documents used in the evaluation, a summary of compliance with permit terms and conditions, and detailed descriptions of all remedial actions taken or proposed to address each violation or deficiency discovered.

The 8-year anniversary audit report shall also include detailed findings from a physical inspection of each on-site sewage treatment and disposal system and an evaluation of the performance and operation of each such system. In the event of a system malfunction or failure, the Permittee shall prepare and submit a remedial plan for the Commissioner's review and written approval.

A copy of each audit shall be submitted concurrently to the local WPCA and to the local Health Department.

This permit is hereby issued on

Yvonne Bolton
Bureau Chief
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection

YB:ea

cc: North Stonington Health Dept.
Tristan Wallace, Loureiro Engineering Associates, Inc.
DMR

ATTACHMENT 1

TABLE A				
Discharge Serial No. 301-2			Monitoring Location: G	
Wastewater Description: Domestic Sewage Influent to Equalization Tank				
Monitoring Location Description: Equalization Tank				
Average Daily Flow: 9,280 gallons per day			Maximum Daily Flow: 13,920 gallons per day	
INSTANTANEOUS MONITORING				
Parameter	Units	Average Monthly Limit	Sample Type	Sample Frequency
Biochemical Oxygen Demand	mg/l	---	Grab	Twice per month
Total Suspended Solids	mg/l	---	Grab	Twice per month
Total Kjeldahl Nitrogen	mg/l	---	Grab	Twice per month
ADDITIONAL NOTES:				
1. “---” in the limits column on this monitoring table means a limit is not specified, but monitoring is required and a value must be reported on the DMR.				

TABLE B				
Discharge Serial No. 301-2			Monitoring Location: J	
Wastewater Description: Effluent Intermediate Process				
Monitoring Location Description: Aeration Tank				
Average Daily Flow: 9,280 gallons per day			Maximum Daily Flow: 13,920 gallons per day	
INSTANTANEOUS MONITORING				
Parameter	Units	Average Monthly Limit	Sample Type	Sample Frequency
pH	S.U.	---	Grab	Twice per month
Temperature	° F	---	Grab	Twice per month
ADDITIONAL NOTES:				
1. “---” in the limits column on this monitoring table means a limit is not specified, but monitoring is required and a value must be reported on the DMR.				

TABLE C					
Discharge Serial No. 301-2			Monitoring Location: 1		
Wastewater Description: Pretreated Domestic Sewage Effluent					
Monitoring Location Description: Effluent Wet Well					
FLOW/TIME BASED MONITORING					
Parameter	Units	Average Daily Flow Limit	Maximum Daily Flow Limit	Sample Type	Sample Frequency
Flow Rate (Average daily) ¹	gpd	9,280	13,920	Daily flow	Continuous
INSTANTANEOUS MONITORING					
Parameter	Units	Average Monthly Limit	Maximum Concentration	Sample Type	Sample Frequency
Biochemical Oxygen Demand	mg/l	20	30	Grab	Twice per month
Total Suspended Solids	mg/l	20	30	Grab	Twice per month
Total Nitrogen	mg/l	10 ²	---	Grab	Twice per month
Ammonia	mg/l	---	---	Grab	Twice per month
Nitrate Nitrogen	mg/l	---	---	Grab	Twice per month
Nitrite Nitrogen	mg/l	---	---	Grab	Twice per month
Total Kjeldahl Nitrogen	mg/l	---	---	Grab	Twice per month
pH, Minimum (Day of Sampling)	S.U.	NA	6.0 - 9.0	Continuous	Continuous
pH, Maximum (Day of Sampling)	S.U.	NA	6.0 - 9.0	Continuous	Continuous
pH, Minimum Value of RDM	S.U.	NA	6.0 - 9.0	Continuous	Continuous
pH, Maximum Value of RDM	S.U.	NA	6.0 - 9.0	Continuous	Continuous
Fecal Coliform	col/100 ml	100	200	Grab	Weekly
Alkalinity	mg/l	---	---	Grab	Twice per month
Turbidity	NTU	---	---	Grab	Twice per month
FOOTNOTES:					
1. For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report on the DMR the Average Daily Flow and the Maximum Daily Flow for each month.					
2. Limit is based on a twelve month rolling average.					
ADDITIONAL NOTES:					
1. “---” in the limits column on this monitoring table means a limit is not specified, but monitoring is required and a value must be reported on the DMR.					
2. “NA” in the limits column on this monitoring table means “Not Applicable”					

ATTACHMENT 2

TABLE D INSPECTION, MONITORING AND MAINTENANCE REQUIREMENTS	
Discharge Serial No.: 301-2	Monitoring Location: S
Wastewater Description: Domestic Sewage	
Average Daily Flow: 9,280 gallons per day	Maximum Daily Flow: 13,920 gallons per day
Inspection, Monitoring, or Maintenance	Minimum Frequency
Mechanical inspection of pump station	Monthly
Pump out pump chamber	Annually
Test run of emergency generator	Monthly
Water meter readings of water usage	Weekly
Visual inspection of aeration chambers	Monthly
Visual inspection of anoxic chambers	Monthly
Visual inspection of clarifier	Monthly
Mechanical inspection of alarms	Monthly
Mechanical inspection of blowers	Monthly
Mechanical inspection of carbon feed system	Monthly
Mechanical inspection of alkalinity feed system	Monthly
Visual inspection of UV-disinfection system	Monthly
Clean UV bulbs	Monthly
Mechanical inspection of valve chambers	Monthly
Visual inspection of distribution chambers	Quarterly
Visual inspection of surface condition of leaching field	Quarterly
Depth of ponding in leaching field	Quarterly
Mow grass over leaching field	3 times per year
ADDITIONAL NOTES: <ol style="list-style-type: none"> 1. All inspection, monitoring, and maintenance required in this table shall be reported annually by the end of each January as an attachment to the December DMR. 2. The North Stonington Sanitarian shall be notified at least one week prior to pumping of septic tanks and grease traps. Verification of all pump outs shall be attached to the monitoring report and a copy of the report shall be sent to the North Stonington Director of Health. 	

ATTACHMENT 3

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TABLE E GROUNDWATER MONITORING			
Discharge Serial No. 301-A, 301-B, 301-C, 301-D		Monitoring Location: GW	
Groundwater Monitoring Location No.: GWW1, GWW3, SW1, and SW2		Description: Downgradient monitoring wells	
Parameter	Units	Minimum Frequency of Sampling	Sample Type
Fecal Coliform	col/100ml	Quarterly	Grab
Groundwater Depth (Standard depth below grade)	Ft	Quarterly	Instantaneous
Ammonia Nitrogen	mg/l	Quarterly	Grab
Nitrate Nitrogen	mg/l	Quarterly	Grab
Nitrite Nitrogen	mg/l	Quarterly	Grab
Total Kjeldahl Nitrogen	mg/l	Quarterly	Grab
Total Nitrogen	mg/l	Quarterly	Grab
pH	S.U.	Quarterly	Instantaneous
Total Dissolved Phosphorous	mg/l	Quarterly	Grab

DATA TRACKING AND TECHNICAL FACT SHEET

APPLICATION No.: 201205837

PERMIT No.: UI0000346

DISCHARGER NAME AND ADDRESS

APPLICANT/PERMITTEE: Hilltop Inn Suites, LLC

MAILING ADDRESS: 373 Norwich-Westerly Road (Route 2), North Stonington, CT 06359

CONTACT PERSON: Umesh Patel (860) 575-3324

LOCATION ADDRESS: Hilltop Inn & Suites
373 Norwich-Westerly Road (Route 2)
North Stonington, CT 06359

PERMIT TYPE

New () Reissuance (X) Modification () Subsection-e ()

PERMIT DURATION

5 YEAR () 10 YEAR (X) 30 YEAR ()

OWNERSHIP CODE

Private (X) Federal () State () Municipal (town only) () Other public ()

DISCHARGE CATEGORIZATION

Point () Non-point (X) GIS # _____
NPDES () Pretreat (X) Ground Water (UIC) (X) Ground Water (Other) ()
Major () Significant Minor () Minor (X)

UIC PERMIT INFORMATION

Total Wells 1 Well Type 5W12

DEEP STAFF ENGINEER/ANALYST

Emily Anness

NATURE OF BUSINESS GENERATING DISCHARGE

Hilltop Inn & Suites, LLC proposes to continue discharging its permitted maximum daily discharge flow of 13,920 gallons per day of domestic sewage wastewaters to the groundwaters in the watershed of the Shunock River watershed from operations at a 139-room hotel.

PROCESS AND TREATMENT DESCRIPTION (by DSN) AT(X) RECYCLE ()

An alternative sewage treatment system comprising an extended aeration wastewater treatment system, which includes a flow equalization tank, aerobic and anoxic biological treatment processes, a clarifier, a granular filter, and UV disinfection, followed by a constructed fill bed and leaching field with a design flow of 13,920 gallons per day.

COMPLIANCE SCHEDULE

YES (X) NO ()
Pollution Prevention () Treatment Requirement () Water Conservation ()
Permit Steps () Water Quality Requirement () Remediation ()
Audit Language (X) Other ()

DATA TRACKING AND TECHNICAL FACT SHEET

RESOURCES USED TO DRAFT PERMIT

<u> </u> Federal Effluent Limitation Guideline	<u>40CFR</u>
<u> </u> Performance Standards	<u> </u> Name of Category
<u> </u> Federal Development Document	<u> </u> Name of Category
<u> </u> Treatability Manual	<u> </u> Name of Category
<u> X </u> Department File Information	
<u> X </u> Connecticut Water Quality Standards	
<u> </u> Anti-degradation Policy	
<u> </u> Coastal Management Consistency Review Form	
<u> </u> Other - Explain	

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

 X Best Professional Judgement (BPJ)
 X Case by Case Determination (See Other Comments)

OTHER COMMENTS

Previous Application and Permit Issuance

On August 12, 1999, Triple L. Holdings, Inc. submitted an individual wastewater discharge permit application, Application No. 199902521, for a maximum discharge of 13,920 gallons per day from a proposed new hotel. Due to shallow depth to ledge, the use of an alternative treatment system was proposed in order to reduce effluent BOD, TSS, Total Nitrogen and bacteria prior to discharging to groundwaters of the Shunock River watershed. After the completion of the alternative treatment system, which included an extended aeration wastewater treatment system (WWTP) and a constructed fill bed, the Department issued Individual Permit No. UI0000346 on August 30, 2002. On May 5, 2005, the Department transferred the permit from Triple L. Holdings, Inc. to Esplanade Hilltop, LLC.

Permit Renewal

On August 7, 2012, Esplanade Hilltop, LLC submitted an untimely permit renewal application, Application No. 201205837, for Individual Permit No. UI0000346. The renewal application was subsequently deemed sufficient on November 5, 2012, which continued authorization to discharge in accordance with the terms and conditions of Individual Permit No. UI0000346 until a final determination is made on Application No. 201205837. Following changes in personnel and a permit transfer on May 21, 2014 from Esplanade Hilltop, LLC to Hilltop Inn Suites, LLC, the permittee submitted an updated engineering report (Attachment Q of the permit renewal application) in 2018. Since the original permit issuance date, the 139-room hotel has undergone no modifications affecting the number of guest rooms or amount of conference room seating, and therefore no adjustments to the design flow are required. Discharge monitoring reports for groundwater data between 2011 and 2018 demonstrated that the constructed fill bed and leaching field provided adequate treatment of WWTP effluent, but the effluent data showed persistent Total Nitrogen exceedances--indicating that the WWTP did not provide sufficient removal of Total Nitrogen prior to discharge to the leaching field. In response to this finding, the Department performed a site investigation on June 7, 2018 and issued NOV WRSS 18002 on August 21, 2018 for failure to properly maintain the WWTP and for violations of permit limits.

Between 2018 and 2020, the permittee implemented several improvements to the WWTP, including

DATA TRACKING AND TECHNICAL FACT SHEET

general repairs to the system structure, adjustments to the carbon source and pH buffer, modifications to the building housing the clarifier and effluent wet well, and operational management. Discharge Monitoring Reports between 2018 and 2020 showed significant improvements in system performance and demonstrated that the WWTP adequately removes Total Nitrogen, therefore bringing the effluent quality and system performance into compliance. On November 5, 2020, the Department closed NOV WRSS 18002.

Revisions to Permit

The 2012 draft permit has been updated to incorporate current permit format language and has been revised as follows:

- 1) Some definitions have been added or revised for clarity. The following definitions have been added: “Maximum Concentration”, “Range During Month”, “3 times per year”, “Twice per Month”. The following definitions have been revised from the original permit, with revisions shown in *italics*:
 - “Average Limit” – is replaced with “Average Monthly Limit,” which means the *highest allowable* average of all grab samples taken during any calendar month.
 - “Quarterly” – revised to read *each calendar quarter ending on the last day of March, June, September, and December*, consistent with the current format definition.
 - “12 month rolling average limit” – is replaced with “Twelve Month Rolling Average,” consistent with the current format definition.
- 2) Tables A, B, and C in Attachment 1 have been reordered as follows and now reflect the correct sequence of the treatment process.
 - Table A (Domestic Sewage Influent to Equalization Tank)
 - Table B (Effluent Intermediate Process – Aeration Tank)
 - Table C (Pretreated Domestic Sewage Effluent – Effluent Wet Well).
- 3) Table C (Pretreated Domestic Sewage Effluent – Effluent Wet Well) monitoring requirements have been updated as follows:
 - pH – Monitoring and reporting requirements for pH have been added to Table C and are consistent with the narrative requirements of Section 4(F) of the permit, which requires that continuous pH monitoring results be reported as a range (i.e., minimum pH and maximum pH) for each month and for each day of sample collection. In addition, a definition for “Range During Month” or “RDM” has been added to Section 2 of the permit, as “RDM” is now used in Table C in the context of minimum and maximum monthly pH values and, more specifically, refers to the lowest and the highest values of all pH monitoring data for the reporting month.
 - Ammonia, Nitrate Nitrogen, Nitrite Nitrogen, Total Kjeldahl Nitrogen, and Turbidity have been added to Table C and are consistent with current permit format language.
 - Fecal Coliform – The “Average Monthly Limit” and “Maximum Concentration” for Fecal Coliform monitoring have replaced the previous narrative of “200 col/100mL for the maximum monthly (30 consecutive day geometric mean)” and is now listed as a “Grab” sample with an associated “Sample Frequency” of “Weekly.”
 - Alkalinity – The “Sample Type” for alkalinity monitoring is now listed as a “Grab” sample with an associated “Sample Frequency” of “Twice per Month.”
- 4) Table D (Inspection, Monitoring & Maintenance Requirements) has been updated as follows:
 - The following inspection, monitoring and maintenance requirements have been added: visual inspection of aeration chambers, visual inspection of anoxic chambers, visual inspection of clarifier, mechanical inspection of alarms, mechanical inspection of blowers, mechanical

DATA TRACKING AND TECHNICAL FACT SHEET

- inspection of carbon feed system, mechanical inspection of alkalinity feed system, visual inspection of UV-disinfection system, clean UV bulbs, mechanical inspection of valve chambers, visual inspection of distribution chambers.
- The frequency for pumping out the pump station has been increased from “Every 5 years” to “Annually” to be consistent with the current permit format language for routine treatment system inspection requirements.
 - The frequency for mowing grass over leaching field has been increased from “At least twice per year” to “3 times per year” to be consistent with the routine treatment system inspection requirements in the current permit format.
- 5) Table E has been renamed as “Groundwater Monitoring” and has been revised to include pH monitoring and reporting requirements in order to be consistent with groundwater monitoring requirements in the current permit format.

PERMIT FEES

Discharge Code 312000a

Representing DSN 301-2

Annual Fee \$1,110

PROJECT HISTORY

Application received on August 7, 2012.

Notice of Sufficiency signed November 5, 2012.

Draft

**NOTICE OF TENTATIVE DECISION AND INTENT TO RENEW A
STATE PERMIT AND AN UNDERGROUND INJECTION CONTROL PERMIT
FOR THE FOLLOWING DISCHARGE INTO THE
WATERS OF THE STATE OF CONNECTICUT**

TENTATIVE DECISION

The Commissioner of Energy and Environmental Protection hereby gives notice of a tentative decision to reissue a permit based on an application submitted by **Hilltop Inn Suites, LLC** ("the applicant") under section 22a-430 of the Connecticut General Statutes for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative decision that continuance of the existing system would protect the waters of the state from pollution.

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

APPLICANT'S PROPOSAL

Hilltop Inn Suites, LLC proposes to continue discharging its permitted maximum daily discharge flow of 13,920 gallons per day of domestic sewage wastewaters to groundwaters in the watershed of the Shunock River from operations at a 139-room hotel.

The name and mailing address of the permit applicant are:

**Hilltop Inn Suites, LLC
373 Norwich-Westerly Road
North Stonington, CT 06359**

The site name and location is:

**Hilltop Inn & Suites
373 Norwich-Westerly Road
North Stonington, CT 06359**

REGULATORY CONDITIONS

Type of Treatment

An alternative sewage treatment system comprising an extended aeration wastewater treatment system, which includes a flow equalization tank, aerobic and anoxic biological treatment processes, a clarifier, a granular filter, and UV disinfection, followed by a constructed fill bed and leaching field with a design flow of 13,920 gallons per day.

Effluent Limitations

This permit contains effluent limitations consistent with a Case by Case Determination using the criteria

of Best Professional Judgement and will protect the waters of the state from pollution when all the conditions of this permit have been met.

Compliance Schedule

The compliance schedule requires the applicant to submit the results of a detailed permit compliance audit every two years.

COMMISSIONER'S AUTHORITY

The Commissioner of Energy and Environmental Protection is authorized to approve or deny such permits pursuant to section 22a-430 of the Connecticut General Statutes and the Water Discharge Permit Regulations (section 22a-430-3 and 4 of the Regulations of Connecticut State Agencies) and section 1421 of the Federal Safe Drinking Water Act 42 USC et. seq.

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. 201205837 PERMIT ID NO. UI0000346

Interested persons may obtain copies of the application from Tristan Wallace, Loureiro Engineering Associates, Inc., 100 Northwest Drive, Plainville, CT 06062, Telephone number 860-747-6181.

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

Petitions for a hearing should include the application number noted above and also identify a contact person to receive notifications. Petitions should also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. In order to facilitate the filing of requests for hearing during the COVID-19 emergency and consistent with the Department's Temporary Directive, the Office of Adjudications will accept electronically-filed petitions in addition to petitions submitted by mail. Petitions with required signatures may be filed by email to deep.adjudications@ct.gov or mailed to the DEEP Office of Adjudications, 79 Elm Street, Hartford, CT 06106. Within thirty (30) days of filing the petition, original petitions that were filed electronically must be also be mailed to the Office at the above-noted address. If the original petition exists only in electronic format or signatures were produced using a computer or typewriter, the petition must be submitted with a statement bearing the wet-ink signature of the petitioner that the petition is only available in that format and has been submitted to satisfy the requirement that an original petition be filed. If a hearing is held, timely notice of such hearing will be published in a newspaper of general circulation and posted on the DEEP website at <https://www.ct.gov/deep>. Additional information can be found at <https://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. Please contact Michael Hart at 860-424 3025 or via email at Michael.hart@ct.gov if you are seeking a communication aid or service, have limited proficiency in English, or require some other accommodation. If you wish to file an ADA or Title VI discrimination complaint, you may submit your complaint to Barbara Viadella or Cenit Mirabal, DEEP Office of Diversity and Equity at (860) 418-5910 or via email at deep.accommodations@ct.gov. In order to facilitate efforts to provide an accommodation, please request all accommodations as soon as possible following notice of any agency hearing, meeting, program or event.



Oswald Inglese, Jr.

Director

Water Permitting and Enforcement Division

Bureau of Materials Management and Compliance Assurance

Dated: April 29, 2021