

UIC PERMIT

issued to

The Whitby School, Inc.
969 Lake Avenue
Greenwich, CT 06381

Location Address:
The Whitby School
969 Lake Avenue
Greenwich, CT 06831

Permit ID: UI0000355

Permit Expires:

Watershed: East Branch Byram River

Basin Code: 7410

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. and section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended.
- (B) The Whitby School, Inc., ("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.
- (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 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.
- (J) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the CGS).

SECTION 2: DEFINITIONS

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

“Average Monthly Discharge Limitation” 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 in the months of February, May, August, and November.

"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.

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. 201205475** for permit reissuance received on July 9, 2012 and the administrative record established in the processing of that application.

(B) The Commissioner hereby authorizes the Permittee to discharge a maximum flow of 2,310 gallons per day of domestic sewage 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 as follows:

(1) From the issuance of this permit through and including the last day of the first calendar month of such issuance, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. UI0000355, issued by the Commissioner to the Permittee on December 30, 2002, the previous application submitted by the Permittee on March 30 2000, 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. UI0000355, issued by the Commissioner to the Permittee on December 30, 2002.

(2) Beginning on the first day of the month following the issuance of this permit, and continuing 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 this permit, Application No. 201205475 received by the Department on July 9, 2012, 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, this permit.

(C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the Federal 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, wastes from water treatment systems, 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 or any other process equipment necessary for the optimal removal of pollutants. The Permittee shall not bypass or 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 specific terms and conditions listed in this permit. The discharge is restricted by, and shall be monitored in accordance with the 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 on a weekly basis. The Permittee shall report pH values, specifically maximum and minimum, for each day of sample collection. The pH range for each month is defined as the highest and lowest single pH reading during all operating days of the month including periods when sampling is not performed.
- (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) 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 ground water 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 a 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, 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.

All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40 CFR 136 unless otherwise specified.

- (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 reported to the Commissioner within 30 days of the exceedance. Resampling for permit violations 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 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 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
 - (1) 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 and notarized copy of the *Connecticut DEEP NetDMR Subscriber Agreement* to the Department.

(b) *Submittal of Reports Using NetDMR*

Unless otherwise approved by the Commissioner, on or before one-hundred and eighty (180) days after issuance of this permit, the Permittee and/or the Signatory Authority shall electronically submit DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement in paragraph (A) 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 or other reports to the Department. The Permittee shall also electronically file any written report of non-compliance described in paragraph (A) 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 provided by this office. 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. The DMR shall also include a detailed explanation of any violations of the limitations specified and corrective actions performed, and a schedule for the completion of any corrective actions remaining.

**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 seven (7) days after issuance of this permit, the Permittee shall record a copy thereof on the land records in the Town of Greenwich. On or before one (1) month after issuance of this permit, the Permittee shall submit written verification to the Commissioner that this permit has been recorded in the land records in the Town of Greenwich.

(B) Every two 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 which 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 and performance logs/records; equipment specifications and 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 discovery.

(C) 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

Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

cc: Greenwich Health Department
James L. Hankins, P.E., Applied Water Management, Inc.
DMR

DRAFT

DRAFT

ATTACHMENT 1

| TABLE A | | | | | |
|--|-----------------------------------|--------------------------|---|-------------|------------------|
| Discharge Serial No. 301-2 | | | Monitoring Location: 1 (effluent) | | |
| Wastewater Description: Domestic Sewage Effluent from Zenon Treatment System | | | | | |
| Monitoring Location Description: Water Storage Tank | | | | | |
| Average Daily Flow: 4,400 gallons per day | | | Maximum Daily Flow: 6,600 gallons per day | | |
| PARAMETER | FLOW/TIME BASED MONITORING | | | | |
| | Units | Average Daily Flow Limit | Maximum Daily Flow Limit | Sample Type | Sample Frequency |
| Flow Rate (Average daily) ¹ | gpd | 4,400 | 6,600 | Daily flow | Continuous |
| PARAMETER | INSTANTANEOUS MONITORING | | | | |
| | 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 | Grab | Twice per month |
| Total Phosphorus | mg/l | --- | 15 | Grab | Twice per month |
| pH | SU | --- | --- | Grab | Weekly |
| Fecal Coliform | col/100ml | 4 | --- | Grab | Weekly |
| 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. | | | | | |
| 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: G (influent) | |
| Wastewater Description: Domestic Sewage Influent to Zenon Treatment System | | | |
| Monitoring Location Description: EQ Sump | | | |
| Average Daily Flow: 4,400 gallons per day | | Maximum Daily Flow: 6,600 gallons per day | |
| PARAMETER | INSTANTANEOUS MONITORING | | |
| | Units | Sample Type | Sample Frequency |
| Biochemical Oxygen Demand | mg/l | Grab | Twice per month |
| Total Suspended Solids | mg/l | Grab | Twice per month |
| Total Nitrogen | mg/l | Grab | Twice per month |

| TABLE C | | | |
|---|---------------------------------|---|------------------|
| Discharge Serial No. 301-2 | | Monitoring Location: J (intermediate) | |
| Wastewater Description: Domestic Sewage | | | |
| Monitoring Location Description: Zenon Process Tank | | | |
| Average Daily Flow: 4,400 gallons per day | | Maximum Daily Flow: 6,600 gallons per day | |
| PARAMETER | INSTANTANEOUS MONITORING | | |
| | Units | Sample Type | Sample Frequency |
| pH | SU | Grab | Weekly |
| Temperature | ° F | Grab | Weekly |
| Alkalinity | mg/l | Grab | Weekly |
| Turbidity | NTU | Grab | Continuous |

ATTACHMENT 2

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TABLE D
INSPECTION, MONITORING AND MAINTENANCE REQUIREMENTS

| | |
|--|---------------------------------|
| Discharge Serial No. 301-2 | |
| Wastewater Description: Domestic Sewage | |
| <u>INSPECTION, MONITORING, or MAINTENANCE</u> | <u>MINIMUM FREQUENCY</u> |
| Depth of sludge in septic tanks | During pump-out |
| Pump out septic tanks | Annually |
| Mechanical inspection of septic tank baffles | During pump-out |
| Mechanical inspection of pump station | Monthly |
| Pump out pump chambers | Annually |
| Test run of emergency generator | Quarterly |
| Water meter readings of water usage | Weekly |
| Visual inspection of Zenon system | 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 at least annually by the end of each January as an attachment to the December DMR. 2. The Greenwich Health Department 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 Greenwich Health Department Director of Health. | |

ATTACHMENT 3

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| TABLE E GROUNDWATER MONITORING | | | |
|--|--------------|--|------------------------|
| DISCHARGE SERIAL NO. 301-A, 301-B | | MONITORING LOCATION: W-downgradient | |
| GROUND WATER MONITORING WELL NO.: GWMW1, GWMW2 | | 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 | Grab |
| Total Dissolved Phosphorous | mg/l | Quarterly | Grab |

DATA TRACKING AND TECHNICAL FACT SHEET

PERMIT #: UI0000355 APPLICATION #: 201205475

DISCHARGER NAME AND ADDRESS DATA

Permittee: The Whitby School, Inc.

Mailing Address:

Street: 969 Lake Avenue

City: Greenwich ST: CT Zip: 06381

Contact Name: Robert
Curtis

Location Address:

Street: 969 Lake Avenue

City: Greenwich St. CT Zip: 06381

Contact Name:

PERMIT DURATION

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

DISCHARGE CATEGORIZATION

POINT() NON-POINT(X) GIS # _____

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

MAJOR() SIGNIFICANT MINOR() MINOR(X)

COMPLIANCE SCHEDULE YES X NO

POLLUTION PREVENTION() TREATMENT REQUIREMENT() WATER CONSERVATION()

PERMIT STEPS () WATER QUALITY REQUIREMENT() REMEDIATION() AUDIT LANGUAGE(X)

OTHER()

OWNERSHIP CODE

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

UIC PERMIT INFORMATION

Total Wells 1 Well Type 5W12

PERMIT FEES

DISCHARGE CODE 312000a REPRESENTING DSN 301-2 ANNUAL FEE \$1,110.00

DEEP STAFF ENGINEER/ANALYST

OTHER COMMENTS

Whitby School had been experiencing hydraulic problems, largely related to system infiltration and inflow from various sources, leading to exceedances of the permitted daily discharge limit for the engineered leaching system. In 2014, after completing an extensive I/I field study, the school retrofitted low lying manholes with water tight covers and further evaluated pumps and conveyances for potential I/I through additional inspection and testing. During the Fall 2014 and Spring 2015, the school also undertook several Department approved initiatives necessary to further reduce I/I and improve the hydraulics of the existing subsurface sewage treatment and disposal system. These actions, which have substantially addressed system hydraulic problems, included:

- Installation of a 9,000 gallon equalization tank to improve flow management within the pretreatment system,
- Installation of groundwater controls upgradient of the engineered leaching system to intercept and redirect groundwater around the leaching area,
- Expansion of the engineered leaching system to increase system depth, ensure a minimum 3 foot vertical separating distance to mounded seasonal high groundwater and eliminate any potential toe-of-slope discharge,
- Isolate and redirect gymnasium water treatment wastewaters away from the domestic sewage pretreatment plant to a dedicated subsurface dispersal structure, and
- Installation of automatic flow regulators on all indoor faucets to reduce wastewater flow to the pretreatment system.

In addition, the wastewater treatment plant now employs a new programmable control panel that monitors flow for all lines coming into the plant and all lines leaving the plant, and physically limits the daily discharge flow to the engineered leaching field to under 2,310 gpd and maximizes the volume of pretreated wastewater recycled back to the school for use as flushwater.

The Zenon treatment plant serving DSN 301-2 is required to meet limits on BOD, TSS, bacteria, and total nitrogen and phosphorus prior to being discharged to the engineered leaching field.

PROJECT HISTORY

Application received on July 9, 2012

Notice of Sufficiency signed on September 20, 2012

Treatment system modification 22a-430-3(i)(3) approved on December 26, 2014



**NOTICE OF TENTATIVE DETERMINATION
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 DETERMINATION

The Commissioner of Energy and Environmental Protection hereby gives notice of a tentative determination to renew a permit based on an application submitted by **The Whitby School, Inc.** ("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 determination that continuance and modification of the existing system to treat the discharge would protect the waters of the state from pollution and the Commissioner proposes to renew a permit for the discharge to the groundwaters in the East Branch Byram River watershed.

APPLICANT'S PROPOSAL

The Whitby School, Inc. presently discharges 2,310 gallons per day of domestic sewage to groundwaters in the watershed of the East Branch Byram River from operations at a Montessori school from grade kindergarten to eight.

The name and mailing address of the permit applicant are:

The Whitby School, Inc.
969 Lake Avenue
Greenwich, CT 06381

The activity takes place at:
The Whitby School
969 Lake Avenue
Greenwich, CT 06831

The proposed activity is within the coastal area as defined in C.G.S. Section 22a-94. Pursuant to C.G.S. Section 22a-98, the applicant must demonstrate that the activities are consistent with all applicable goals and policies in C.G.S. Section 22a-92, and that such activities incorporate all reasonable measures mitigating any adverse impacts on coastal resources and future water-dependent development activities.

REGULATORY CONDITIONS

Type of Treatment

The school is served by a Zenon Municipal Systems Wastewater Treatment and Recycling System. The Zenon system consists of aerobic and anoxic biological treatment processes, membrane filtration and

ultraviolet disinfection. The treatment process also includes septic tanks, a pump chamber and flow equalization tank. Treated effluent is discharged to an engineered leaching system with a portion of the total treated effluent being recycled for reuse as flush water.

Effluent Limitations

This permit contains effluent limitations consistent with a Case by Case Determination using the criteria of Best Professional Judgment and which will protect the waters of the state from pollution when all the conditions of this permit have been met.

Compliance Schedule

This permit contains an enforceable compliance schedule which 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 (1) 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) (2) 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. 201205475 PERMIT ID NO. UI0000355

Interested persons may obtain copies of the application from:

DYMAR
800 Main Street South
Suite 132
Southbury, CT 06488
Attn: Mark E. Lancor, P.E.

The application is available for inspection by contacting Ramona Goode 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 Ramona Goode, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby, and shall hold a hearing upon receipt of a petition signed by at least twenty-five persons. Notice of any public hearing shall be published at least 30 days prior to the hearing.

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

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



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

Dated:

FEB 03 2016