NPDES PERMIT

issued to

Rogers Corporation
One technology Drive
Rogers, CT 06263

Location Address:
245 Woodstock Road
Woodstock, CT 06281

Permit ID: CT0021504

Receiving Stream: May Brook

Stream Segment ID: CT3708–07–1

Permit Expires:

SECTION 1: GENERAL PROVISIONS

(A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and section 402(b) of the Clean Water Act, as amended, 33 USC 1251, et. seq., and pursuant to an approval dated September 26, 1973, by the Administrator of the United States Environmental Protection Agency for the State of Connecticut to administer an N.P.D.E.S. permit program.

(B) Rogers Corporation ("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)(10)(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-157b of the CGS.

(E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("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) No provision of this permit and no action or inaction by the 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) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.

(H) 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, except for "No Observable Acute Effect Level (NOAEL)" which is redefined below.

(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.

"Annually" in the context of any sampling frequency found in Section 5, shall mean the sample must be collected when the discharge occurs during one of the following months; July, August and September.

"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.

"Critical Test Concentration (CTC)" means the specified effluent dilution at which the Permittee is to conduct a single-concentration Aquatic Toxicity test.

"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 discharged 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.

"In stream Waste Concentration (IWC)" means the concentration of a discharge in the receiving water after mixing has occurred in the allocated zone of influence.

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

"mg/l" means milligrams per liter.

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

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

"No Observable Acute Effect Level (NOAEL)" means any concentration equal to or less than the critical test concentration in a single concentration (pass/fail) toxicity test conducted pursuant to section 22a-430-3(j)(7)(A)(i) RCSA demonstrating 90% or greater survival of test organisms at the CTC.

"Range During Month" ("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" ("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 means the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"µg/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S DECISION

(A) The Commissioner has issued a final determination and found that continuance of the existing discharge will not cause pollution of the waters of the state. The Commissioner’s decision is based on Application No. 201303847 for permit reissuance received on August 22, 2013 and the administrative record established in the processing of that application.

(B) (1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT REISSUANCE], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms

and conditions of Permit No. CT0021504, issued by the Commissioner to the Permittee on February 23, 2009, the previous application submitted by the Permittee on January 26, 1999, 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. CT0021504, issued by the Commissioner to the Permittee on February 23, 2009.

(2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. CT0021504, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 201303847 received by the Department on August 22, 2013, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. CT0021504, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].

(C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which 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: GENERAL EFFLUENT LIMITATIONS

(A) No discharge shall contain, or cause in the receiving stream, a visible oil sheen or floating solids; or, cause visible discoloration or foaming in the receiving stream.

(B) No discharge shall cause acute or chronic toxicity in the receiving water body beyond any zone of influence specifically allocated to that discharge in this permit.

(C) The temperature of any discharge shall not increase the temperature of the receiving stream above 85^{o}F, or, in any case, raise the normal temperature of the receiving stream more than 4^{o}F.

SECTION 5: SPECIFIC EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(A) The discharge shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharge is restricted by, and shall be monitored in accordance with, the table below:

Table A

Discharge Serial Number: 001-1 | **Monitoring Location:** 1

Wastewater Description: Fire pump test wastewater

Monitoring Location Description: Prior to discharging into the fire pond located at southeast end of the site

Allocated zone of Influence (ZOI): NA | **In-stream Waste Concentration:** NA

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test [2]
		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	
Aquatic Toxicity, Daphnia pulex, NOAEL=100% [3]	%	NA	NA	NR	NA	≥ 90	Annually	Grab	
Aquatic Toxicity, Pimephales promelas, NOAEL=100% [3]	%	NA	NA	NR	NA	≥ 90	Annually	Grab	
Copper, Total [4,6]	mg/l	NA	NA	NR	NA	0.014	Annually	Grab	*
Flow, Instantaneous	gpm	NA	NA	NR	NA	----	Annually	Instantaneous	
Flow (Day of Sampling)	gpd	NA	72,000	Annually	Total Flow	NA	NR	NA	
Iron, Total [4,6]	mg/l	NA	NA	NR	NA	----	Annually	Grab	
Lead, Total [4,6]	mg/l	NA	NA	NR	NA	0.030	Annually	Grab	*
Nitrogen, Ammonia (total as N) [4,6]	mg/l	NA	NA	NR	NA	----	Annually	Grab	
Oil and Grease, Total [4,6]	mg/l	NA	NA	NR	NA	20.0	Annually	Grab	
pH, Minimum [4,5]	S.U.	NA	NA	NR	NA	6.0 [4,5]	Annually	Grab	
pH, Maximum [4,5]	S.U.	NA	NA	NR	NA	9.0 [4,5]	Annually	Grab	
Total Residual chlorine [4,6]	mg/l	NA	NA	NR	NA	0.019	Annually	Grab	
Total Suspended Solids [4,6]	mg/l	NA	NA	NR	NA	----	Annually	Grab	
Zinc, Total [4,6]	mg/l	NA	NA	NR	NA	0.065	Annually	Grab	*

Table Footnotes and Remarks:

Footnotes:

[1] The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry 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] Minimum Level Test refers to Section 6 Paragraph A(3) of this permit.

[3] The results of the toxicity tests are recorded in % survival. The Permittee shall report the % survival result on the DMR based on criteria in Section 6(B) of this permit.

[4] Testing for this parameter shall be performed on the same sample used for aquatic toxicity testing.

[5] The Permittee shall maintain at the facility a record of the pH of the fire pond water (pH influent) for each day of discharge and shall report with the DMR submittal the influent pH in the event that on the day of sampling the influent pH is outside the allowable pH range of 6-9, then the pH of the discharge shall be within +/- 0.5 S.U of the influent (pond water).

[6] On the day of discharge but prior to pumping activity, the Permittee shall sample the intake fire pond water for copper; iron; lead; nitrogen (ammonia); oil and grease; total residual chlorine; total suspended solids and zinc, and shall maintain a record of these analyses at the facility. In the event that the limits on this table are exceeded, the exceedance shall not be considered a violation of Permit No. CT0021504 if the difference between the effluent data and the influent data is no more than ½ the minimum level specified in the permit for a given chemical pollutant.

Remark:

a) The Permittee shall clean out the impeller of the pump and the sump in which it rests before the fire pump testing is performed and shall submit as an attachment to the DMR, a certification that this maintenance was performed. The silt or sediment from the clean out must not be allowed to wash back into the fire pond.

(1) All samples shall be comprised of only the wastewater described in this table. Samples shall be collected prior to combination with receiving waters or wastewater of any other type, and after all approved treatment units, if applicable. All samples collected shall be representative of the discharge during standard operating conditions.

(2) In cases where limits and sample type are specified but sampling is not required by this permit, the limits specified shall apply to all samples which may be collected and analyzed by the Department of Energy and Environmental Protection personnel, the Permittee, or other parties.

SECTION 6: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES

(A) Chemical Analysis

(1) 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.

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

(3) The Minimum Levels specified below represent the concentrations at which quantification must be achieved and verified during the chemical analyses for the parameters identified in Section 5 Table A. Analyses for these parameters must include check standards within ten percent of the specified Minimum Level or calibration points equal to or less than the specified Minimum Level.

Parameter	Minimum Level
Chlorine, total residual	20.0 µg/L
Copper	5.0 µg/L
Lead	5.0 µg/L
Zinc	10.0 µg/L

(4) The value of each parameter for which monitoring is required under this permit shall be reported to the maximum level of accuracy and precision possible consistent with the requirements of this section of the permit.

(5) Effluent analyses for which quantification was verified during the analysis at or below the minimum levels specified in this section and which indicate that a parameter was not detected shall be reported as "less than x" where 'x' is the numerical value equivalent to the analytical method detection limit for that analysis.

(6) Results of effluent analyses which indicate that a parameter was not present at a concentration greater than or equal to the Minimum Level specified for that analysis shall be considered equivalent to zero (0.0) for purposes of determining compliance with effluent limitations or conditions specified in this permit.

(B) Acute Aquatic Toxicity Test

(1) Samples for monitoring of Aquatic Toxicity shall be collected and handled as prescribed in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012).

(a) Grab samples shall be chilled immediately following collection. Samples shall be held at 4 degrees Centigrade until Aquatic Toxicity testing is initiated.

(b) Effluent samples shall not be dechlorinated, filtered, or, modified in any way, prior to testing for Aquatic Toxicity unless specifically approved in writing by the Commissioner for monitoring at this facility.

(c) Chemical analyses of the parameters identified in Section 5 Table A shall be conducted on an aliquot of the same sample tested for Aquatic Toxicity.

(d) At a minimum, pH, specific conductance, total alkalinity, total hardness, and total residual chlorine shall be measured in the effluent sample and, during Aquatic Toxicity tests, in the highest concentration of test solution and in the dilution (control) water at the beginning of the test and at test termination. If Total Residual Chlorine is not detected at test initiation, it does not need to be measured at test termination. Dissolved oxygen, pH, and temperature shall be measured in the control and all test concentrations at the beginning of the test, daily thereafter, and at test termination.

(e) Tests for Aquatic Toxicity shall be initiated within 24 hours of sample collection.

(2) Monitoring for Aquatic Toxicity to determine compliance with the permit limit on Aquatic Toxicity (invertebrate) above shall be conducted for 48-hours utilizing neonatal Daphnia pulex (less than 24-hours old)

(3) Monitoring for Aquatic Toxicity to determine compliance with the permit limit on Aquatic Toxicity (vertebrate) above shall be conducted for 48-hours utilizing larval Pimephales promelas (1-14 days old with no more than 24-hours range in age).

(4) Tests for Aquatic Toxicity shall be conducted as prescribed for static non-renewal acute tests in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (EPA/821-R-02-012), except as specified below.

(a) For Aquatic Toxicity Limits and for monitoring only conditions, expressed as an NOAEL value, Pass/Fail (single-concentration) tests shall be conducted at a specified Critical Test Concentration (CTC) equal to the Aquatic Toxicity Limit, or 100% in the case of monitoring only conditions, as prescribed in section 22a-430-3(j)(7)(A)(I) of the Regulations of Connecticut State Agencies, except that five replicates of undiluted effluent and five replicates of effluent diluted to the CTC shall be included.

(b) Organisms shall not be fed during the tests.

(c) Copper nitrate shall be used as the reference toxicant in tests with freshwater organisms.

(d) Synthetic freshwater prepared with deionized water adjusted to a hardness of 50 mg/L (plus or minus 5 mg/L) as CaCO3 shall be used as dilution water in tests with freshwater organisms.

(5) Compliance with limits on Aquatic Toxicity shall be determined as follows:

(a) For limits expressed as an NOAEL value, compliance shall be demonstrated when the results of a valid pass/fail Aquatic Toxicity test indicates there is greater than 50% survival in the undiluted effluent and 90% or greater survival in the effluent at the specified CTC.

SECTION 7: REPORTING REQUIREMENTS

(A) The results of chemical analyses and any aquatic toxicity test 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 (Attn: DMR Processing) at the following address. 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 samples are collected.

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

(B) Complete and accurate aquatic toxicity test data, including percent survival of test organisms in each replicate test chamber, LC50 values and 95% confidence intervals for definitive test protocols, and all supporting chemical/physical measurements performed in association with any aquatic toxicity test, including measured daily flow and hours of operation for the 30 consecutive operating days prior to sample collection if compliance with a limit on Aquatic Toxicity is based on toxicity limits based on actual flows described in Section 7, shall be entered on the Aquatic Toxicity Monitoring Report form (ATMR) and sent to the Bureau of Water Protection and Land Reuse at the following address. The ATMR shall be received at this address by the last day of the month following the month in which samples are collected.

Bureau of Water Protection and Land Reuse (Attn: Aquatic Toxicity)
Connecticut Department of Energy and Environmental Protection
79 Elm St.
Hartford, CT 06106-5127

(C) 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 and ATMR, 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.

(D) NetDMR Reporting Requirements

(1) Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit 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 fifteen (15) 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 30th day of the month following the completed reporting period. All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs or other reports to the Department. 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
79 Elm Street
Hartford, CT 06106-5127

SECTION 8: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

(A) If any sample analysis indicates that an Aquatic Toxicity effluent limitation in Section 5 of this permit has been exceeded, or that the test was invalid, another sample of the effluent shall be collected and tested for Aquatic Toxicity and associated chemical parameters, as described above in Section 5 and Section 6, and the results reported to the Bureau of Materials Management and Compliance Assurance (Attn: DMR Processing), at the address listed above, within 30 days of the exceedance or invalid test. Results of all tests, whether valid or invalid, shall be reported.

(B) If any two consecutive test results or any three test results in a twelve month period indicates that an Aquatic Toxicity Limit has been exceeded, the Permittee shall immediately take all reasonable steps to eliminate toxicity wherever possible and shall submit a report to Bureau of Materials Management and Compliance Assurance (Attn: Aquatic Toxicity) for the review and approval of the Commissioner in accordance with section 22a-430-3(j)(10)(c) of the RCSA describing proposed steps to eliminate the toxic impact of the discharge on the receiving water body. Such a report shall include a proposed time schedule to accomplish toxicity reduction and the Permittee shall comply with any schedule approved by the Commissioner.

(C) The Permittee shall notify the Bureau of Materials Management and Compliance Assurance, Water Permitting and Enforcement Division, within 72 hours and in writing within thirty days of the discharge of any substance listed in the application but not listed in the permit if the concentration or quantity of that substance exceeds two times the level listed in the application.

This permit is hereby issued on

_____
Macky McCleary
Deputy Commissioner
Department of Energy and Environmental Protection

WASTEWATER DISCHARGE PERMIT: DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Rogers Corporation

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0021504 *APPLICATION #: 201303847*

Mailing Address:						*Location Address:*					
Street:	*One technology Drive*					*Street:*	*245 Woodstock Road*				
City:	*Rogers*	*ST:*	*CT*	*Zip:*	*06263*	*City:*	*Woodstock*	*ST:*	*CT*	*Zip:*	*06281*
Contact Name:	*Michal Werbecki*					*DMR Contact*	*Michal Werbecki*				
Phone No.:	*(860) 779-4765*					*Phone No.:*	*(860) 779-4765*				
Contact E-mail:	*Michal.Werbecki@Rogerscorporation.com*					*DMR Contact E-mail:*	*Same as Contact E-mail*				

PERMIT INFORMATION

DURATION *5 YEAR _X_* *10 YEAR ___* *30 YEAR ___*

TYPE *New __* *Reissuance _X_* *Modification ___*

CATEGORIZATION *POINT (X)* *NON-POINT ()*

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

*NPDES MAJOR **(MA)*** ___
*NPDES SIGNIFICANT MINOR or PRETREAT SIU **(SI)*** ___
*NPDES or PRETREATMENT MINOR **(MI)*** X
*PRETREAT SIGNIFICANT INDUS USER **(SIU)*** ___
*PRETREAT CATEGORICAL **(CIU)*** ___
SIC Code _____

POLLUTION PREVENTION MANDATE __ *ENVIRONMENTAL EQUITY ISSUE ___*

SOLVENT MANAGEMENT PLAN
IS THE FACILITY OPERATING UNDER AN APPROVED SOLVENT MANAGEMENT PLAN? Yes __ No _X_ (Not applicable)

COMPLIANCE SCHEDULE *YES__* *NO X__*

POLLUTION PREVENTION ___ *TREATMENT REQUIREMENT__* *WATER CONSERVATION__*

WATER QUALITY REQUIREMENT __ *REMEDIATION __* *OTHER __*

RECENT ENFORCEMENT HISTORY

IS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? YES ___ NO _X___

OWNERSHIP CODE

*Private _X_* *Federal __* *State __* *Municipal (town only) __* *Other public __*

DEEP STAFF ENGINEER *Oluwatoyin Fakilede*

PERMIT FEES

Discharge Code	*DSN Number*	*Annual Fee*
*121000R**	*001-1*	*$660.00*

** Reduction – The annual permit fee has been reduced (see Other Comments).*

FOR NPDES DISCHARGES

Drainage basin Code: 3708 *Water Quality Standard: AA*

NATURE OF BUSINESS GENERATING DISCHARGE

Rogers Corporation under direction of its insurance provider performs annual testing of the pumping capacity of its fire suppression system. During the testing, water from a supply pond on site is pumped through several valves and then discharged back into the supply pond. The process allows the insurance provider to verify the flow capacity of the fire suppression system.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: This discharge is comprised of 72,000 gallons per day of fire pump testing wastewater. There is no treatment required for this discharge.

RESOURCES USED TO DRAFT PERMIT

__ *Federal Effluent Limitation Guideline 40CFR*

__ *Performance Standards*

__ *Federal Development Document*

__ *Treatability Manual*

_X_ *Department File Information*

_X_ *Connecticut Water Quality Standards*

__ *Anti-degradation Policy*

__ *Coastal Management Consistency Review Form*

_X_ *Other – Explain*
http://water.epa.gov/scitech/swguidance/standards/criteria/current/upload/nrwqc-2009.pdf

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

_X_ *Case by Case Determination using Best Professional Judgment (See Other Comments)*

_X_ *In order to meet in-stream water quality (See General Comments)*
Copper (MDL), lead (MDL), total residual chlorine (MDL) and zinc (MDL)

MDL:- Maximum Daily Limit

GENERAL COMMENTS

The previous permit had a maximum flow limit of 216,000 gpd. This flow limit was reduced to 72,000 gpd in this permit with the agreement of the Permittee. The need for inclusion of water quality based discharge limitations in this permit was evaluated consistent with Connecticut Water Quality Standards and criteria, pursuant to 40 CFR 122.44(d). Each parameter was evaluated for consistency with the available aquatic life criteria. The reasonable potential statistical procedures outlined in the EPA Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001) were employed to calculate the need for such limits. Comparison of monitoring data and its inherent variability with the calculated water quality based limits indicates a statistical probability of exceedance of such limits. There is no mixing zone allocated to this discharge. Therefore, water quality criteria were included as limits in the permit for copper, lead, total residual chlorine and zinc (see Appendix A).

Though these limits are higher than the limits in the previous permit, it does not contravene the anti-backsliding rule in accordance with Section 22a-430-4(l)(4)(A)(xxiii) of the Regulations of Connecticut State Agencies and Section 402(o)(2) of the Clean Water Act. This is because the circumstances on which the previous permit was based have changed since the permit is being renewed to include a 66.6% flow reduction. The proposed concentration limits equate to lower mass loadings when compared with the previous concentration limits because of the flow reduction. In addition, the proposed limits do not violate water quality standards as the Permittee is required to comply with the water quality criteria at the end of pipe.

A review of Rogers Corporation discharge monitoring report from 2009 to 2013 showed that with the proposed limits, there would have been one copper limit exceedance. The data on Attachment O of the permit renewal application also shows that there is a possibility of exceedance of the proposed water quality limit for total residual chlorine. At this time, it is unclear if the effluent quality is as a result of fire pump testing activity (water travels through the pump, piping and nozzles), or if it is actually the intake water quality. Therefore, a requirement to sample the influent water prior to the pump testing activity has been included in this permit. The influent water is to be analyzed for copper; iron; lead; nitrogen (ammonia); oil and grease; total residual chlorine; total suspended solids and zinc. In the next permit cycle, this data would assist the department to make a "no-net increase" evaluation and therefore decide if permit limits are actually needed for these pollutants. Based on best professional judgment, the permit includes a provision that allows an exceedance of the water quality limit if the difference between the effluent data and the influent data is no more than ½ the minimum level specified in the permit for a given chemical pollutant. This difference is to account for the limitations of testing instrumentation at low levels of quantification.

The previous permit required the Permittee to clean out the impeller of the pump and the sump in which it rests before the fire pump testing is performed. This requirement was modified to;

1) *include a requirement to submit as an attachment to the DMR, a certification that this maintenance was performed and*
2) *prohibit the dumping of the silt/sediment from the clean out into the fire pond.*

About 5,800 gallons of wastewater is generated during the clean out of the impeller of the pump and the sump. The Permittee will install a bag filter at the outlet of the discharge hose prior to using the water for lawn watering. The sediment will then be disposed by the Permittee.

Water quality limit for iron was not included in this permit because there is no acute water quality criterion for iron[1] and the discharge is not expected to have a chronic effect on the receiving stream since the discharge only occurs for one hour, once in a year. However, monitoring for iron was included in this permit because it is a pollutant of concern in the fire pump testing wastewater.

Monitoring requirement for total residue chlorine was eliminated during the last permit renewal process because total residue chlorine was consistently below detection and was not expected to be present in the fire pump test water since city water is not used in the fire pump testing operation. However, data submitted in the Attachment O of Rogers Corporation permit renewal application showed total residue chlorine to be present in the fire pump testing water with concentration level of 0.052 mg/l. Therefore, monitoring requirement and water quality limit were included in this permit for total residue chlorine.

The receiving stream, May Brook has not been assessed and a final total maximum daily load (TMDL) analysis has not been completed for it. May Brook is a tributary to Muddy Brook and Muddy Brook is listed as being impaired with

Escherichia coli (E.coli) with a completed TMDL. However, E.coli is not a pollutant of concern with the fire pump testing wastewater. Therefore, monitoring requirements and limits were not included in this permit for E.coli.

OTHER COMMENTS

RCSA Section 22a-430-7(Schedule B) specifies an annual fee of $ 2,290.00 for discharge of hydrostatic pressure testing wastewaters with flows that are more than 50,000 gallons per day. The discharge covered under this permit is more than 50,000 gallons but the discharge only occurs once in a year. This annual fee amount is excessive in relation to the cost of the permitted activity. Therefore, it is recommended that the annual permit fees assigned to hydrostatic pressure testing wastewater in RCSA Section 22a-430-7(Schedule B) be given a reduction from $ 2,290.00 to $ 660.00 in accordance with section7(g) of RCSA.

Monitoring requirements were included in this permit for ammonia nitrogen and total suspended solids based on a case-by-case determination using best professional judgment and consistent with the previous permit. The fire pump is lubricated to prevent friction. Therefore, an instantaneous limit for total oil and grease was included in the permit using section 22a-430-4(s) of the RCSA as a guide. Best practicable control technology (BPT), best conventional pollutant control technology (BCT), and 40 CFR 133 Secondary Treatment Regulations were used as guidance in establishing limitations for pH. In the event that on the day of sampling the influent pH is outside the allowable pH range of 6-9, the pH of the discharge shall be within +/- 0.5 S.U of the influent (pond water).

The draft permit was e-mailed to Mr. Michal Werbecki of Rogers Corporation on March 26, 2014. The Permittee concurs with the terms and conditions of the draft permit.

[1] *See the website reference included under the "resources used to draft permit" section of this fact.*

APPENDIX A: REASONABLE POTENTIAL ANALYSIS

DMR analytical data from January 2009 – September 2012

Date/Pollutant	*Chlorine (µg/l)*	*Copper (µg/l)*	*Lead (µg/l)*	*Zinc (µg/l)*
7/31/2009	---	*1.0**	*8*	*42*
7/31/2010	---	*1.0**	*1.0**	*1.0**
7/31/2011	---	*6.2*	*4.7*	*38*
9/30/2012	---	*27*	*9.6*	*55*
11/14/2013	*52*	*6.0*	*2.0***	*12*
____	*Since there are only 5 data sets is not calculated. is assumed to be 0.6, in accordance with EPA Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001).*			

** Reported as below detection on the DMR, but substituted with the laboratory minimum detection levels for the purpose of reasonable potential determination.*
***Reported as less than .002 mg/l on Attachment O of permit renewal application.*

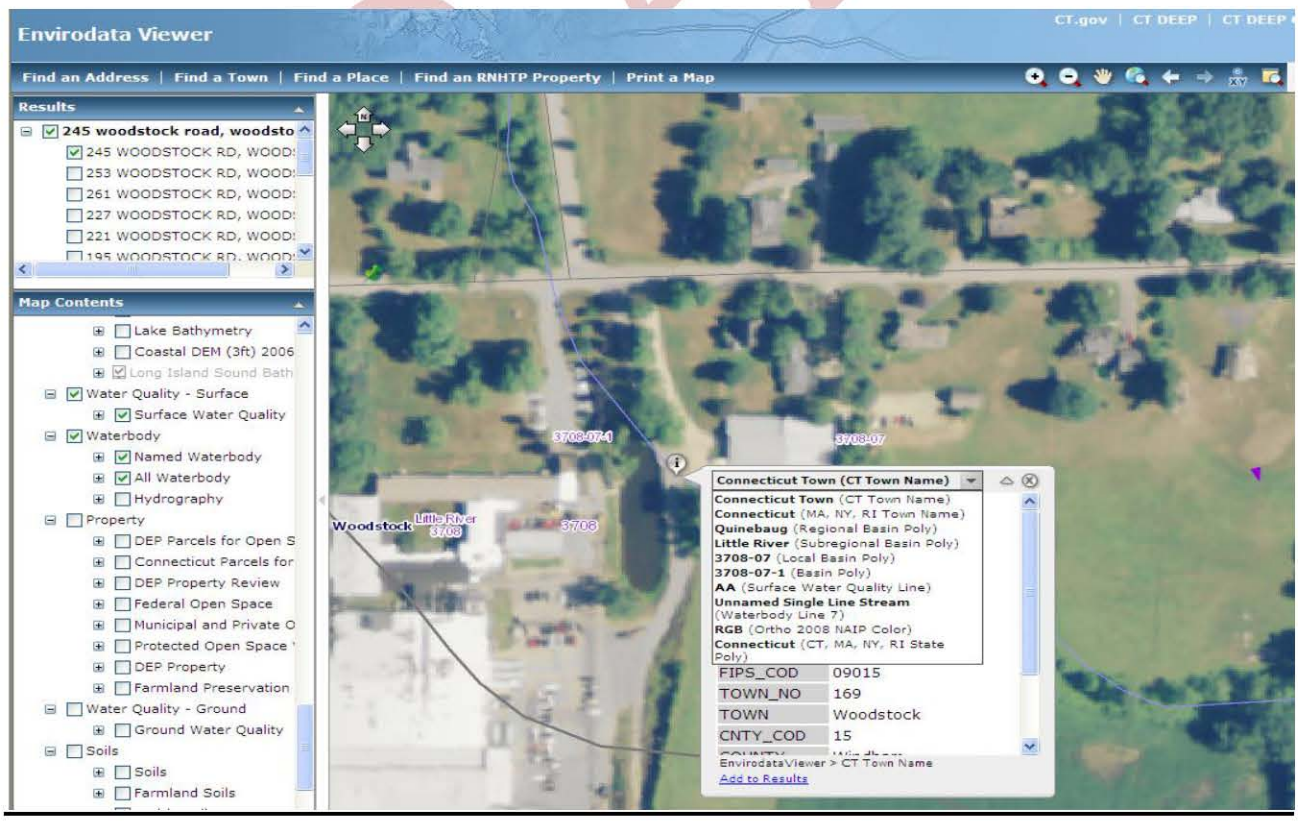
CONNECTICUT WATER QUALITY CRITERIA (FRESHWATER)	
	Aquatic Life (Acute (µg/l))
Chlorine	*19.0*
Copper	*14.3*
Lead	*30*
Zinc	*65*
Remark: The chronic and the human health water quality criteria will not be used for the reasonable potential analysis. Since the discharge occurs for only one hour once in a year, the discharge is not expected to have a long term effect on the receiving stream. In addition, the receiving stream is not currently a drinking water source.	

REASONABLE POTENTIAL EVALUATION (Zone of influence is not allocated to this discharge)			
		____	
Chlorine	52 X 13.2 = 686.4	19.0	Yes
Copper	27 X 4.2 = 113.4	14.3	Yes
Lead	9.6 X 4.2 = 40.32	30.0	Yes
Zinc	55 X 4.2 = 231	65.0	Yes

Table 3-1. Reasonable Potential Multiplying Factors: 99% Confidence Level and 99% Probability Basis

Number of	Coefficient of Variation																			
Samples	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1.0	1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9	2.0
1	1.6	2.5	3.9	6.0	9.0	13.2	18.9	26.5	36.2	48.3	63.3	81.4	102.8	128.0	157.1	190.3	227.8	269.9	316.7	368.3
2	1.4	2.0	2.9	4.0	5.5	7.4	9.8	12.7	16.1	20.2	24.9	30.3	36.3	43.0	50.4	58.4	67.2	76.6	86.7	97.5
3	1.4	1.9	2.5	3.3	4.4	5.6	7.2	8.9	11.0	13.4	16.0	19.0	22.2	25.7	29.4	33.5	37.7	42.3	47.0	52.0
4	1.3	1.7	2.3	2.9	3.8	4.7	5.9	7.2	8.7	10.3	12.2	14.2	16.3	18.6	21.0	23.6	26.3	29.1	32.1	35.1
5	1.3	1.7	2.1	2.7	3.4	4.2	5.1	6.2	7.3	8.6	10.0	11.5	13.1	14.8	16.6	18.4	20.4	22.4	24.5	26.6
6	1.3	1.6	2.0	2.5	3.1	3.8	4.6	5.5	6.4	7.5	8.6	9.8	11.1	12.4	13.8	15.3	16.8	18.3	19.9	21.5
7	1.3	1.6	2.0	2.4	2.9	3.6	4.2	5.0	5.8	6.7	7.7	8.7	9.7	10.8	12.0	13.1	14.4	15.6	16.9	18.2
8	1.2	1.5	1.9	2.3	2.8	3.3	3.9	4.6	5.3	6.1	6.9	7.8	8.7	9.6	10.6	11.6	12.6	13.6	14.7	15.8
9	1.2	1.5	1.8	2.2	2.7	3.2	3.7	4.3	5.0	5.7	6.4	7.1	7.9	8.7	9.6	10.4	11.3	12.2	13.1	14.0
10	1.2	1.5	1.8	2.2	2.6	3.0	3.5	4.1	4.7	5.3	5.9	6.6	7.3	8.0	8.8	9.5	10.3	11.0	11.8	12.6
11	1.2	1.5	1.8	2.1	2.5	2.9	3.4	3.9	4.4	5.0	5.6	6.2	6.8	7.4	8.1	8.8	9.4	10.1	10.8	11.5
12	1.2	1.4	1.7	2.0	2.4	2.8	3.2	3.7	4.2	4.7	5.2	5.8	6.4	7.0	7.5	8.1	8.8	9.4	10.0	10.6
13	1.2	1.4	1.7	2.0	2.3	2.7	3.1	3.6	4.0	4.5	5.0	5.5	6.0	6.5	7.1	7.6	8.2	8.7	9.3	9.9
14	1.2	1.4	1.7	2.0	2.3	2.6	3.0	3.4	3.9	4.3	4.8	5.2	5.7	6.2	6.7	7.2	7.7	8.2	8.7	9.2
15	1.2	1.4	1.6	1.9	2.2	2.6	2.9	3.3	3.7	4.1	4.6	5.0	5.4	5.9	6.4	6.8	7.3	7.7	8.2	8.7
16	1.2	1.4	1.6	1.9	2.2	2.5	2.9	3.2	3.6	4.0	4.4	4.8	5.2	5.6	6.1	6.5	6.9	7.3	7.8	8.2
17	1.2	1.4	1.6	1.9	2.1	2.5	2.8	3.1	3.5	3.8	4.2	4.6	5.0	5.4	5.8	6.2	6.6	7.0	7.4	7.8
18	1.2	1.4	1.6	1.8	2.1	2.4	2.7	3.0	3.4	3.7	4.1	4.4	4.8	5.2	5.6	5.9	6.3	6.7	7.0	7.4
19	1.2	1.4	1.6	1.8	2.1	2.4	2.7	3.0	3.3	3.6	4.0	4.3	4.6	5.0	5.3	5.7	6.0	6.4	6.7	7.1
20	1.2	1.3	1.6	1.8	2.0	2.3	2.6	2.9	3.2	3.5	3.8	4.2	4.5	4.8	5.2	5.5	5.8	6.1	6.5	6.8

MAP OF DISCHARGE LOCATION



Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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

NOTICE OF TENTATIVE DECISION INTENT TO RENEW A NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM 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 renew a permit based on an application submitted by **Rogers Corporation** ("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 discharge would not cause pollution of the waters of the state and the Commissioner proposes to renew a permit for the discharge to the May Brook.

The proposed permit, if issued by the Commissioner, will require periodic monitoring to demonstrate that the discharge will not cause pollution.

APPLICANT'S PROPOSAL

Rogers Corporation presently discharges once a year at a maximum daily flow of 216,000 gallons per day of fire pump testing water to the May Brook from a miscellaneous plastic products manufacturing facility. The proposed permit if issued by the Commissioner, would reduce the maximum daily flow to 72,000 gallons per day.

The name and mailing address of the permit applicant are: Rogers Corporation, One Technology Drive, Rogers, CT 06263.

The activity takes place at: 30 feet south from fire pump building.

REGULATORY CONDITIONS

Type of Treatment

DSN 001-1: No treatment is necessary

Effluent Limitations

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

In accordance with section 22a-430-4(l) of the Regulations of Connecticut State Agencies the permit contains effluent limitations for the following types of toxic substances: heavy metals and total residual chlorine.

COMMISSIONER'S AUTHORITY

The Commissioner of Energy and Environmental Protection is authorized to approve or deny such permits pursuant to section 402(b) of the Federal Water Pollution Control Act, as amended, 33 USC 1251, et. seq. and 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).

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. 201303847 PERMIT ID NO.CT0021504

Interested persons may obtain copies of the application from Michal Werbecki, One Technology Drive, Rogers, CT 06263, (860) 779-4765.

The application is available for inspection by contacting Oluwatoyin Fakilede at 860-424-3018, 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 determination 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 Oluwatoyin Fakilede, 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: APR 0 2 2014