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Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

February 2026

Table of Contents

Stormwater Pollution Prevention Plan
National Chromium

1 Introduction 1
1.1 Facility Description 1
1.2 Pollution Prevention Team 2
1.3 Additional Permits 2
2 Site Drainage 3
2.1 Drainage Area 1 3
2.2 Drainage Area 2 3
3 Potential Pollutant Sources 4
3.1 Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage 4
3.2 Solid De-Icing Material Storage 4
3.3 Industrial Materials Storage Areas 4
3.4 Materials Handling Activities 5
3.5 Other Industrial Activity and Potential Pollutant Sources 5
3.6 Method and Location of On-Site Storage or Disposal 5
3.7 Spills and Leaks 6
3.8 Evaluation of Unauthorized Non-Stormwater Discharges 6
4 Stormwater Control Measures 7
4.1 Good Housekeeping 7
4.2 Minimizing Exposure 8
4.3 Containment of Liquid Chemicals and Wastewater 9
4.3.1 Stationary Storage or Storage Areas 9
4.3.2 Mobile or Portable Storage 9
4.4 Dust Control Measures 10
4.5 Vehicles and Equipment 10
4.6 Solid De-icing Material Storage 10
4.7 Emergency Response Procedures 10
4.7.1 Spill Prevention 10
4.7.2 Spill Response Procedures 11
4.7.3 Spill Notification and Reporting Procedures 13
4.7.4 Spill Response Equipment 15
4.8 Sediment and Erosion Control 15
4.9 Future Construction 15
4.10 Preventative Maintenance 15
4.11 Management of Stormwater 16
4.12 Infiltration and Groundwater Quality Protection 17
4.13 Employee Training 17
4.14 Resiliency Measures 17
4.15 Sector-Specific Control Measures (Sector AA) 17
5 Inspections and Assessments 18
5.1 Monthly Routine Inspections 19

Table of Contents

Stormwater Pollution Prevention Plan
National Chromium

5.2 Quarterly Visual Assessments of Stormwater Discharges 19
5.3 Semi-Annual Comprehensive Inspections 19
5.4 Inspection Report Documentation 20
6 Monitoring Program 20
6.1 Discharge Identification 20
6.1.1 Sample Location 20
6.2 Stormwater Sampling Procedures 21
6.2.1 Qualifying Storm Event 21
6.2.2 Sample Collection and Analysis 21
6.2.3 Benchmark Monitoring 21
6.2.4 Annual Toxicity Monitoring 22
6.2.5 Annual Impaired Waters Monitoring 22
6.2.6 Other Monitoring as Required by the Commissioner 22
6.3 Inability to Collect Samples 22
6.4 Exemptions from Monitoring 23
6.5 "Run-On" or Natural Background Pollutant Levels Exemption 23
7 Reporting Requirements 24
7.1 Discharge Monitoring Reports 24
7.2 Annual Report 24
7.3 Additional Reporting and Recordkeeping Requirements 25
8 Corrective Actions 25
8.1 Benchmark Threshold Exceedance 25
8.1.1 Corrective Action Measure Level 1 26
8.1.2 Corrective Action Measure Level 2 26
8.1.3 Corrective Action Measure Level 3 26
8.2 Effluent Limit Exceedance 27
8.3 Unauthorized Release or Discharge 27
8.4 Inconsistency with Applicable TMDL 27
8.5 Control Measures Not Stringent Enough to Meet Water Quality Standards 27
8.6 Control Measures Never Designed, Installed, Implemented, or Maintained 28
8.7 Change in Design, Operation, or Maintenance 28
8.8 Visual Assessment Shows Evidence of Pollution 28
8.9 Corrective Actions Schedule 29
8.9.1 Immediate Actions (within 1-2 days) 29
8.9.2 Subsequent Actions (within 14-60 days) 29
8.9.3 Extension for Corrective Actions (Greater than 60 days) 29
9 Maintaining the Stormwater Pollution Prevention Plan 29
9.1 Records Retention 29

Table of Contents

Stormwater Pollution Prevention Plan
National Chromium

9.2 Plan Review and Amendment Procedure 30

Figures

1 Site Location Map
2 Site Map

Tables

1 Stormwater Pollution Prevention Team & Spill Response Contractor Information
2 Summary of Drainage Areas
3 Inventory of Exposed Materials and Associated Pollutants
4 Areas Where Potential Spills and Leaks Could Occur
5 Summary of Stormwater Monitoring Parameters
6 Summary of Triggering Conditions Requiring Corrective Action Measures
7 Summary of Stormwater Monitoring Data Collected During Previous Permit Term

Appendices

A NPDES General Permit for the Discharge of Stormwater Associated with Industrial Activities
B SWPPP Certifications
C Records of Spills and Leaks
D Reporting Quantities Flow Chart and DEEP Spill Notification Form
E Employee Training Program
F Inspection Forms and Records
G Discharge Monitoring Reports and Associated Records
H Visual Stormwater Assessments & Benchmark Monitoring Procedures and Forms
I Non-Compliance Notifications and Corrective Action Documentation
J SWPPP Amendment Log
K Copy of General Permit Registration, Authorization Letter, and Documentation
L Implementation Plan

1 Introduction

This Stormwater Pollution Prevention Plan (SWPPP) was prepared for National Chromium Company, Inc. (National Chromium) located at 10 Senexet Road in Putnam, Connecticut. This Plan was prepared in accordance with the *National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Stormwater Associated with Industrial Activities* (General Permit) effective on November 1, 2025. A copy of the General Permit is included as *Appendix A*. :You can access the General Permit in its entirety on the DEEP website https://portal.ct.gov/deep/water-regulating-and-discharges/stormwater/industrial-stormwater-gp#Permit.

This SWPPP complies with the applicable content requirements specified in the General Permit and provides information and details on the following elements:

- Pollution Prevention Team
- Site description and mapping
- Summary of potential pollutant sources and inventory of exposed materials
- Stormwater control measures and Best Management Practices (BMPs)
- Inspection and Assessment Procedures
- Stormwater monitoring, reporting, and corrective action procedures
- Climate resiliency and adaptive measures
- Sector specific requirements
- Certification and recordkeeping requirements
- Signature and plan authorization

A copy of this Plan will be retained onsite and available for review during normal business hours and upon request by the Commissioner of the Connecticut Department of Energy and Environmental Protection (CT DEEP).

1.1 Facility Description

Facility Name: National Chromium

Facility Address: 10 Senexet Road, Putnam, CT, 06260

Owner: National Chromium Company, Inc.

Owner Address: 10 Senexet Road, Putnam, CT, 06260

National Chromium plates and finishes metal parts for industrial and commercial applications at the Putnam facility. The manufacturing operations include dipping the metal parts, washing and drying products, and final cutting/trimming and packaging of products for shipment.

The facility operates under Standard Industrial Classification (SIC) Code 3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring). Based on the SIC Code, the facility is subject to the General Permit due to the potential for exposure of industrial materials and operations to stormwater and the presence of point source stormwater discharges. The corresponding North American Industry Classification System (NAICS) Code is 332813 (Electroplating, Plating, Polishing, Anodizing, and Coloring). The facility is categorized under Sector AA of the General Permit, which includes Fabricated Metal Products.

The facility is located on an approximately 7.97-acre parcel, approximately 4.77 acres of which are located in the Town of Putnam, Connecticut and approximately 3.2 acres of which are located in the Town of Woodstock, Connecticut. All industrial activity occurs in the parcel that is located in Putnam. The amount of impervious surface, including parking areas, driveways, walkways, other paved areas, and roofs for the developed portion of the site is approximately 55,796 square feet (1.28 acres). The remaining undeveloped portions of the site consist of dense forested areas. The facility is located in an industrial area, bounded to the southeast by Woodstock Avenue, residential properties to the northwest, Senexet Road to the northeast, and woodland/forested area to the southwest. The site contains a multi-story manufacturing building and associated employee/visitor parking lot. A United States Geological Survey (USGS) site location map is provided as *Figure 1.* A Site Map showing drainage areas and other features required by the General Permit is included as *Figure 2.* Additional site location details have been included below:

- The site is not located within the Coastal Boundary.
- The site and its discharge points are within areas mapped in DEEP's June 2025 Natural Diversity Data Base (NDDB) as containing endangered, threatened, or special concern species and important natural communities. However, DEEP has determined that activities at the site are not expected to negatively impact State-listed species.
- The site is not located within an Aquifer Protection Area.
- Implementation of this Plan will not impact historic properties.
- The site discharges stormwater to the Little River, which has a surface water quality classification of B. The facility has reviewed receiving waters associated with stormwater discharges and has determined that the site does not discharge to high quality waters. The facility will continue to monitor the classification of the receiving waterbody to assess whether, in the future, new or increased discharge to high quality waters becomes applicable.
- The site does not discharge within 500 feet of a tidal wetland.
- The facility maintains an existing discharge to an impaired waterbody. The facility will not create new or increased discharges of the pollutant(s) causing the impairment unless it can be demonstrated that there will be no net increase in pollutant loading.
- The site is within a groundwater quality classification of GB

1.2 Pollution Prevention Team

The facility personnel listed in *Table 1* are designated as members of the Pollution Prevention Team. The team members, their responsibilities, and contact phone numbers are provided in the table. The Pollution Prevention Team is responsible for implementation, maintenance, and revising the SWPPP as well as the site's stormwater control measures and taking corrective actions when required. At least one team member is present at the facility or on-call during all operational shifts. Each team member has access to either an electronic or paper copy of the General Permit, the SWPPP, and other relevant documents or information required to be kept with the SWPPP.

1.3 Additional Permits

Wastewater generated at National Chromium is regulated under authorization pursuant to Section 22a-430 or 22a-430b of the Connecticut General Statues. The facility operates in accordance with the following permit(s):

- *Industrial Pretreatment Permit (SP0001416)* –These wastewaters are discharged to the Town of Putnam sanitary sewer system.

2 Site Drainage

National Chromium is located on a 4.77 -acre parcel at 10 Senexet Road in Putnam, Connecticut. A Site Map showing the facility is provided as *Figure 2*. The Site Map identifies industrial activities, materials, and other sources which may contribute pollutants in the stormwater discharge. As shown on the Site Map, two drainage areas are associated with industrial activities at the site, which discharges stormwater to the Little River. All operational portions of the site are paved, while unpaved portions of the property are landscaped areas covered with grass and vegetation. Several areas of the property, such as employee and visitor parking lots, are not associated with industrial activity. General descriptions of each portion of the site and its corresponding drainage area are provided below.

2.1 Drainage Area 1

Drainage Area 1 is approximately 0.6 acres and consists of impervious surfaces, including the paved driveway, gravel driveway, gravel employee parking lot, and loading/unloading areas. It also contains loading and unloading areas, and material storage areas (i.e. dumpsters, a 2,000-gallon # 2 fuel oil Aboveground Storage Tank (AST), electrical transformers). Vehicle and truck traffic occurs regularly throughout the paved and gravel portions of Drainage Area 1.

The stormwater drainage system within Drainage Area 1 consists of a series of catch basins that collect stormwater runoff from the eastern and southern portions of the developed property. The catch basin located at the loading dock is connected to a 600-gallon holding tank in the basement of the facility. Stormwater collected in the holding tank is inspected prior to discharge for evidence of oily sheen. The stormwater is conveyed through underground piping west, where it drains to a rip-rap lined outfall (Outfall 1) to the wooded/wetlands area on the property before draining to the Little River.

Potential sources of stormwater pollution in this drainage area include incidental drips or leaks of vehicle fluids, chemical spills or leaks during material transfers, and particulate matter from outdoor storage areas. Potential pollutants associated with this drainage area include suspended solids, petroleum hydrocarbons, metals, and chemical oxygen demand.

2.2 Drainage Area 2

Drainage Area 2 includes the northern and western portion of the site, is approximately 0.66 acres, and consists of impervious surfaces including the gravel driveway, roof area, and gravel employee parking areas. Vehicle and truck, and forklift traffic occurs occasionally throughout the gravel portions of Drainage Area 2.

The stormwater drainage system within Drainage Area 2 consists of roof drains and sheet flow directing stormwater either to be infiltrated or to the drainage swale located west of the building. The drainage swale directs the flow to the same area as Outfall 1 in the wooded area in the southwest of the building. Outfall 1 is believed to be representative of the facility because it is situated to capture runoff from the facilities industrial activities.

Potential sources of stormwater pollution within this drainage area include, drips and leaks of vehicle fluids and air emissions from roof vents,. Potential pollutants associated with this drainage area include activities/materials include suspended solids, petroleum hydrocarbons, metals, and chemical oxygen demand.

3 Potential Pollutant Sources

A list of potential pollutant sources including all significant materials handled or stored onsite that may be exposed to precipitation and potentially impact stormwater is provided in *Table 3*. The list identifies each source, location of storage, associated pollutants or pollutant constituents, and management practices to minimize exposure. A description of these potential pollutant sources is also provided in *Sections 3.1 through 3.5* below, practices designed to reduce or minimize potential impacts to stormwater from these sources are outlined in *Section 4*.

If new materials are added or existing materials are altered, they will be evaluated to determine whether they could adversely affect the quality of stormwater runoff at the facility. Where storage modifications or additional stormwater control measures are necessary, these measures will be implemented prior to the new materials being brought onsite, and the SWPPP will be amended accordingly.

A Site Map provided as *Figure 2* identifies features relevant to the potential pollutant sources. The map also includes the general layout of the Site, including stormwater outfalls and drainage structures, locations of exposed materials, areas with elevated risk of exposure (e.g., loading and unloading areas), and existing structural stormwater control measures.

3.1 Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage

National Chromium does not conduct vehicle and equipment fueling, cleaning, or maintenance onsite. Under the General Permit, discharges of vehicle wash water to the ground, stormwater system, or surface waters of the state are not authorized.

3.2 Solid De-Icing Material Storage

National Chromium does not maintain any storage piles containing de-icing materials exposed to precipitation.

3.3 Industrial Materials Storage Areas

All finished products and raw materials are stored indoors with no potential for exposure to precipitation. The following materials are stored outdoors and may have potential for stormwater contact:

- Municipal trash and recyclables dumpsters – Located south of the building
- Wooden pallet storage – Located under roof near loading dock
- 2,000-gallon # 2 Fuel Oil AST – Located southwest of the building, with secondary containment
- Utility owned electrical transformers (4) – Located on the south and east side of the building

These storage areas are identified on the Site Map (*Figure 2*). Each location is routinely inspected as part of the SWPPP inspection program outlined in *Section 5* of this Plan.

3.4 Materials Handling Activities

Spillage of raw materials or waste materials during loading, unloading, or transfer operations could introduce pollutants into the stormwater system. Raw materials or non-bulk shipments, including containers and drums are handled at the shipping and receiving dock on the southeast side of the facility. Spills are prevented on and around the loading dock by the design and location of this structure. The loading dock is removed from general vehicle traffic and the inside receiving area is also removed from pedestrian traffic and factory processes. The loading dock is constructed to allow direct, horizontal transfer of materials from standard height tractor trailers. No inclined ramps or elevated platforms are required to unload materials and bring them into the receiving area. Any spill would drain to the catch basin that is directed to the 600-gallon holding tank in the basement of the facility, which will be disposed of if any oily sheen is detected.

Materials are transferred around the facility using forklifts and/or an electric pallet jack, and containers are secured during transport. Indoor transfer and potential spills have minimal risk to impact stormwater. Outdoor transfers and potential spills may impact stormwater. The amount of the spill would be limited to the maximum number of containers being transported, which is generally limited to a 55-gallon drum. Any spill that occurs is promptly cleaned following the spill response procedures in *Section 4.7.2*.

Material handling and transfer activities, including loading and unloading operations, are conducted by trained personnel. Spill kits are maintained in strategic locations and used to respond to potential spills or leaks. National Chromium will contact a spill response contractor if the spill cannot be contained using in-house resources.

Material handling and loading and unloading areas are routinely inspected following the procedures in *Section 5*, and as necessary corrective actions are implemented promptly. Locations of material transfer and loading and unloading areas are identified on the Site Map (*Figure 2*).

3.5 Other Industrial Activity and Potential Pollutant Sources

The facility has processes and operations that exhaust through roof vents. These exhausts are a potential source of particulates and other pollutants. Deposition of atmospheric dust and grit on roof surfaces and facility grounds may also be a potential stormwater pollutant. In addition, vehicle and equipment traffic throughout the facility, including access roads, loading/unloading areas, and parking areas, can generate dust, sediment, residuals, and minor leaks of fluids which may impact stormwater. Routine inspection of roof areas, vehicle/equipment routines, and facility yard are conducted to check for leaks, spills, and residues that could impact stormwater. Preventive measures, such as sweeping, debris removal, and cleaning spills and leaks are implemented as needed to minimize impacts to stormwater runoff.

3.6 Method and Location of On-Site Storage or Disposal

The facility manages onsite storage and disposal activities to minimize or prevent exposure of pollutants to stormwater, including the following:

- Municipal waste and recyclables: Collected in designated waste containers with covers. The containers are routinely inspected to ensure they are in good condition. Dumpsters are inspected to ensure drain plugs are intact. Waste and recyclable materials are regularly removed offsite by licensed waste haulers.

- Wooden pallets: Are stored outdoors, under a roof cover on the southeast side of the building. Pallets are clean and free of residue. Broken pallets are transferred into a roll-off and disposed offsite as needed.
- Fuel Oil AST: The 2,000-gallon #2 fuel oil AST is enclosed in a metal containment structure capable of containing 110% pf the contents, located outside the southeast corner of the building. The tank is routinely inspected to confirm it is in good condition and there is no evidence of spills or leaks.
- Electrical Transformers (4): There are 4 transformers at the facility that are utility owned, located near the loading dock. Facility personnel complete informal inspection of this equipment routinely. If issues are noted, National Chromium will coordinate with the utility company to address any potential problems.

National Chromium implements good housekeeping measures to minimize potential stormwater impacts. This includes maintaining the facility in a clean and orderly condition, conducting routine inspections and cleanup of outdoor storage areas, ensuring spill response equipment is stocked and accessible, and promptly responding to spill or leaks. Good housekeeping measures are outlined further in *Section 4.1* of this Plan.

3.7 Spills and Leaks

Under the General Permit, spills and leaks are defined as "five gallons or more of petroleum products, or toxic or hazardous substances that could affect stormwater, as listed in section 22a-430-4 Appendix B Tables II, III and V, and Appendix D of the Regulations of Connecticut State Agencies (RCSA), and 40 CFR 116.4". Areas at the facility where potential spills or leaks could occur and contribute pollutants to stormwater discharge is listed in *Table 4.* Spills and leaks that occurred within the three (3) years prior to the SWPPP certification date are documented in *Appendix C* and shown on *Figure 2.* Any future spills or leaks meeting the above definition will be documented in *Appendix C* and/or in facility records within twenty-four (24) hours of discovery. Documentation will include a description of the incident, the response actions, clean-up completion, notifications made, personnel involved, and measures implemented to prevent recurrence

3.8 Evaluation of Unauthorized Non-Stormwater Discharges

An evaluation of the stormwater drainage system was performed on October 14, 2025, by Charlotte Peele from Fuss & O'Neill, Inc. to determine whether any unauthorized non-stormwater discharges were present. The evaluation included discussions with facility personnel, a visual inspection of the facility, a review of site mapping, inspection of stormwater outfalls and catch basins, and observations made during a site walk-through. Based on this evaluation, no unauthorized non-stormwater discharges were observed, and facility personnel are not aware of any such discharges at the site. National Chromium may generate the following authorized non-stormwater discharges:

- Discharges from emergency/unplanned fire-fighting activities.
- Landscape irrigation or lawn watering.
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids.
- Uncontaminated ground water or spring water.
- Uncontaminated ground water from foundation or footing drains.
- Water sprayed for dust control, in accordance with the conditions of this general permit.

- All other non-stormwater discharges except those specifically listed in this general permit are not authorized by this permit. Such discharges to surface water must be authorized under a different permit issued by the Commissioner pursuant to Section 22a-430 or 22a-430b of the Conn. Gen. Stat.

4 Stormwater Control Measures

National Chromium implements a combination of structural and non-structural Stormwater Control Measures (SCM) at the facility to minimize or prevent the discharge of pollutants in stormwater runoff. The selection, design, installation, and implementation of these SCM are performed in accordance with best engineering practices, manufacturer's specifications, and the Connecticut Stormwater Quality Manual.

All SCMs are routinely inspected and evaluated to ensure they remain effective in minimizing discharges of pollutants to stormwater. The schedule and frequency associated with maintaining, modifying, or implementing new SCMs will be determined based on the findings of inspections, visual assessments, and stormwater monitoring conducted in accordance with the Industrial Stormwater General Permit. Members of the pollution prevention team will be responsible for reviewing the outcome of the inspection and monitoring activities and taking appropriate corrective action(s) in accordance with the General Permit.

If National Chromium determines that existing SCMs are not effective or insufficient to meet applicable water quality standards or other conditions of the General Permit, the SCMs will be modified, repaired, or replaced as necessary in accordance with the corrective action procedures in *Section 8* of this Plan. The following sections describe the types of SCM implemented at the facility.

4.1 Good Housekeeping

National Chromium implements good housekeeping practices throughout the facility to maintain a clean and orderly work environment. These practices are designed to minimize the discharge of pollutants from areas exposed to precipitation, reduce the potential for stormwater contamination from site activities, and prevent accidental spills and leaks.

In accordance with the requirements of the General Permit, facilities must maintain all exposed areas that are potential sources of pollutants in a clean condition. Good housekeeping measures must be implemented to minimize pollutants discharges from all areas that are exposed to precipitation and could impact stormwater quality. The following describes the specific good housekeeping measures implemented at the facility.

- Paved areas of the site will be swept or vacuumed at regular intervals. If the area is washed down, any wash water generated will be collected, treated, or properly disposed of.
- The General Permit does not authorize the discharge of wash waters containing any additives or chemical (e.g., detergent, flocculant, or algicide) to the ground, stormwater system, or surface waters.
- Materials will be stored in appropriate containers and, as applicable, liquid materials will be placed in containers with secondary containment and covered (as appropriate) to prevent exposure to precipitation.
- Areas will be kept free of waste, garbage, and floatable debris to prevent these pollutants from being discharged with stormwater runoff.
- Dumpsters, trash compactors, and roll-off containers used for waste or recyclable materials will be maintained in good, watertight condition with drain plugs intact. Containers will have covers or will be

maintained in roofed areas (where possible). All dumpsters not under a roof will remain closed when the containers are not being loaded or unloaded.

- The General Permit does not authorize the discharge of any liquids (including stormwater) which collects in dumpsters, roll-offs, and any similar large waste containers to the ground, stormwater system, or surface water.
- Drains located directly beneath loading docks will be routinely inspected for accumulation of sediment, grit, trash, and other debris and clean out drains when debris reaches half the depth of the drain.
- Floor drains that are connected to the storm sewer system or if the connection is unknown will be eliminated or sealed.
- Roof areas will be inspected to determine if any potential sources of stormwater pollution are present, such as drippage, dust, or particulates from exhausts or vents, and implement corrective action(s) as needed to minimize these sources or potential sources of pollution.

4.2 Minimizing Exposure

National Chromium will implement measures to minimize the exposure of industrial material and activities to rain, stormwater run-on, snow, or snowmelt. In accordance with the General Permit, National Chromium will minimize pollutant discharges from all areas exposed to precipitation that are potential sources of stormwater contamination. This includes ensuring that manufacturing, processing, and material storage areas are properly protected from contact with precipitation and runoff. The following practices are implemented at the facility:

- Industrial materials and activities will be located inside to the maximum extent practicable to prevent contact with stormwater.
- Industrial materials stored outdoors will be covered with storm-resistant coverings or otherwise protected to minimize exposure to precipitation.
- Grading, berms, or curbing will be used as needed to prevent runoff of potentially contaminated flows and to divert stormwater run-on away from these areas.
- Materials, equipment, and activities will be located and managed to ensure that any potential spills or leaks are contained and prevented from entering the stormwater system.
- Spills and leaks will be promptly cleaned using absorbent materials, spill response equipment will be maintained at strategic locations throughout the facility.
- Vehicles and equipment showing signs of leaks will be repaired promptly or stored indoors when feasible. If stored outdoors, drip pans and absorbent materials will be utilized to prevent pollutants from impacting stormwater.
- Fluids from vehicles and equipment to be decommissioned will be drained prior to storage. Vehicles and equipment that will remain unused for extended periods will be inspected at least monthly for evidence of spills or leaks.

4.3 Containment of Liquid Chemicals and Wastewater

National Chromium will prevent unauthorized discharges of liquid chemicals or wastewater from mixing with stormwater or causing pollution to the waters of the state by implementing the following control measures for stationary storage containers/areas and mobile or portable storage tanks or containers.

4.3.1 Stationary Storage or Storage Areas

Stationary aboveground tanks or containers exposed to stormwater must be either double-walled or placed within an impermeable secondary containment structure. The containment system must be capable of containing at least 110% of the volume of the largest tank/container or 10% of the total volume of all tanks and containers stored in the area the (whichever is larger), without overflowing the containment area.

National Chromium maintains one 2,000-gallon AST located outside the building. The tank stores #2 fuel oil, which serves as the fuel source for the onsite boilers.

The tank is enclosed in a steel containment providing 110% secondary containment, and includes an overfill alarm and enclosed fill pipe. The feed pipe from the fuel oil AST to the Facility boilers is enclosed within an outer pipe that slopes back toward the tank secondary containment structure. A tight fitting hatch with an overhanging lip prevents the infiltration of rainwater into the AST enclosure, except when the hatch is open for tank filling. Should rainwater collect in the secondary containment, the Pollution Prevention Team Leader will be contacted and will arrange for the water to be pumped into a container and disposed of appropriately.

In the unlikely event of a release, fuel would be contained within the steel containment. If the secondary containment was compromised or a spill/leak occurs during transfer, fuel would flow over into the nearby wooded area and National Chromium would implement spill response procedures outlined in *Section 4.7.2* of this Plan.

There are four utility owned transformers located outside the building. The transformers store mineral oil. Any leaks of the mineral oil have potential to impact stormwater quality. These transformers are owned and maintained by the utility company. Due to the design and operational integrity of the transformers, the potential for stormwater pollution is considered to be relatively insignificant. Any minor seepage of insulating oil would be quickly detected during routine inspections conducted by the Pollution Prevention Team and reported to the utility company.

No other stationary aboveground storage tanks, containers, or other storage areas for liquid chemicals or wastewater are located outdoors with potential exposure to precipitation.

4.3.2 Mobile or Portable Storage

National Chromium does not currently store mobile or portable aboveground tanks or containers for collection or storage of wastewater which are exposed to stormwater. If these containers are stored onsite in the future, they will be managed by one of the following methods:

- Kept in double-walled tanks or container
- Designed, operated, and maintained to prevent releases of wastewater from risks such as physical or chemical damage, tampering/vandalism, freezing, and thawing.

- Any trailer secured to a mobile or portable aboveground tank or container will be a registered motor vehicle that is capable of on-road transport of wastewater.

4.4 Dust Control Measures

National Chromium has evaluated onsite operations to determine activities with the potential to generate dust or airborne particulates. Industrial activities occur indoors and as such particulate generating activities are minimal onsite. However, dust may be generated from vehicle traffic and exhaust emissions. To minimize dust generation and off-site tracking of materials, vehicle traffic areas are paved and swept as needed. Outdoor material storage is minimal, and good housekeeping practices are implemented to prevent accumulation of debris and particulate matter. The facility does not utilize dust suppression water. There is one dust collector used for processing that is under a roof on the west side of the building.

4.5 Vehicles and Equipment

National Chromium has evaluated control measures necessary to minimize impacts associated with vehicle and equipment use, storage, and maintenance activities. Control measures implemented at the site are designed to prevent leaks, spills, and other releases of pollutants from vehicles and equipment which may impact stormwater.

The site does not conduct vehicles or equipment fueling, cleaning, or maintenance activities onsite. The General Permit prohibits the discharge of vehicle wash water to the ground, stormwater system, or surface water.

4.6 Solid De-icing Material Storage

National Chromium does not maintain any storage piles containing de-icing materials for de-icing or other commercial or industrial purposes which are exposed to precipitation. If any de-icing storage piles are maintained outdoors in the future, National Chromium will comply with the control measures outlined in Section 4.2.7 of the General Permit.

4.7 Emergency Response Procedures

The purpose of this section is to provide a readily useable set of procedures which can be followed in an emergency, specifically a spill, leak, or other releases which could impact stormwater. Members of the Pollution Prevention Team will coordinate spill response, review of control measures, implementation of corrective actions, and if required regulatory reporting.

4.7.1 Spill Prevention

To minimize potential for spills, leaks, and other releases that could impact stormwater quality, the following measures are implemented at the facility:

- All areas where potential spills and leaks could occur and potentially impact stormwater have been identified and summarized in *Table 4*.
- All containers susceptible to spillage or leakage that could contribute pollutants to stormwater runoff are clearly labeled to ensure proper handling, storage and disposal.
- Employee training is provided on procedures for stopping, containing, reporting, and cleaning up spills and leaks. An example training outline has been provided in *Appendix E*.

- Materials are stored and handled in accordance with established procedures, including the use of secondary containment where appropriate. Specific material management practices are detailed in *Section 3.4*.
- Spill kits and cleanup equipment are maintained at strategic locations throughout the facility where spills may occur. Locations of spill response equipment are shown on the Site Map (*Figure 2*)
- Facility personnel will immediately notify a member of the Pollution Prevention Team or a supervisor whenever a spill, leak, or release occurs. Stormwater Pollution Prevention Team contacts and emergency spill response contractors are listed in *Table 1*. Spill response procedures are detailed in *Section 4.7*.
- Any leak, spill, or unauthorized discharge to the stormwater drainage system containing a hazardous substance or oil in an amount equal to or more than reportable quantities must be reported to DEEP immediately once they are identified.

4.7.2 Spill Response Procedures

National Chromium personnel will only respond to incidental spills as defined below. Leaks, spills, and other releases that may be exposed to stormwater will be handled in the following manner:

Incidental Spills

The spill is incidental and manageable by facility personnel if all the following are true:

1. The spill of hazardous substance can be sorbed or otherwise controlled at the time of release by employees or other trained persons present.
2. The spill is either inside or outside facility buildings on an impervious surface and does not reach pervious surfaces (i.e., soil) or drains.
3. The spill would not have posed a threat to human health and the environment if the spill had not been immediately controlled.

In response to an incidental spill, the following steps will be taken:

1. If an employee observes a spill, the employee will immediately notify a member of the Pollution Prevention Team or supervisor who will assess the release. If the Plan Manager decides the spill does not constitute a threat to human health or the environment and does not require assistance by personnel outside the immediate area of the spill, then clean-up will begin.
2. The Plan Manager or assigned trained persons will clean-up the spill. Employees or trained people cleaning up the spill will be attired in the necessary protective equipment (i.e., goggles, chemical resistant gloves, etc.). If necessary, clean-up will be preceded by an attempt to stop the discharge and limit any migration of the release by laying berms.
3. The Plan Manager or trained personnel will collect and contain or absorb the released material with appropriate disposable materials.
4. The collected material or sorbent, PPE such as gloves, etc. will be labeled, containerized, and disposed of properly.

5. The Plan Manager will ensure no waste incompatible with released materials is treated, stored, or disposed of at the facility until the clean-up is complete.
6. The Regulations of Connecticut State Agencies (RCSA) Section 22a-450-1 through -6 (revised March 8, 2022) require petroleum spills and other discharges of hazardous materials to be reported to DEEP at 860-424-3338 within 1 hour of discovery. Release reporting is required to be conducted in accordance with the *Connecticut Release Reporting Regulations – Reportable Quantities* flow chart included in *Appendix D*.
7. The Plan Manager will ensure all emergency equipment listed in the Plan is cleaned and fit for its intended use before operations at the facility resume.
8. The emergency coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment before operations resume.

Releases/Non-Incidental Spills

Facility personnel will not remediate releases/non-incidental spills. They will contact a licensed contractor to address releases as described below. A release meets one or more of the following criteria:

1. The released substance cannot be collected, sorbed, or otherwise controlled at the time of release by employees or other trained persons present.
2. The release is either inside or outside facility buildings on a pervious surface or may reach pervious surfaces (i.e., soil), or drains.
3. The spill would pose a threat to human health and the environment if the release had not been immediately controlled.

The following describe procedures for non-incidental hazardous releases:

1. Upon detection of the release, the discovering employee will immediately notify a member of the Pollution Prevention Team, or supervisor, or Plan Manager that there has been a release and the extent of or potential for migration of the spill to the environment.
2. The Plan Manager will try to identify the character, amount, source, and extent of the release as well as assess the real or potential threats to human health or the environment from this release.
3. The Plan Manager may decide to evacuate the building or facility in which case the evacuation alarm will be activated.
4. If deemed necessary by the emergency coordinator, the Fire Department (911), the Police Department (911), and/or the local hospital will be notified.
5. The Plan Manager will contact an outside emergency response contractor to remediate the release.
6. The Regulations of Connecticut State Agencies (RCSA) Section 22a-450-1 through -6 (revised March 8, 2022) require petroleum spills and other discharges of hazardous materials to be reported to DEEP at 860-424-3338 within 1 hour of discovery. Release reporting is required to be conducted in accordance with the *Connecticut Release Reporting Regulations – Reportable Quantities* flow chart included in *Appendix D*.

7. If the Plan Manager determines that a Reportable Quantity has been released or believes there exists a threat to human health or the environment outside of the facility and evacuation of local areas may become necessary, then the emergency coordinator will notify the local authorities as well as the National Response Center immediately at (800) 424-8802.
8. The Plan Manager will ensure no waste incompatible with released materials is treated, stored, or disposed of at the facility until the clean-up is complete.
9. The Plan Manager will ensure all emergency equipment listed in the Plan is cleaned and fit for its intended use before operations at the facility resume.
10. The Plan Manager will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment before operations resume.
11. Materials contaminated as a result of the clean-up will be containerized and disposed of properly.

4.7.3 Spill Notification and Reporting Procedures

The Plan Manager will be responsible for making the necessary notifications and submitting written reports to the necessary regulatory agencies. Release reporting is required to be conducted in accordance with the Connecticut Release Reporting Regulations – Reportable Quantities flow chart included in *Appendix D.* Documentation related to reportable releases and spills should be maintained in *Appendix C* or in facility files.

Immediately following the spill incident, facility personnel who were involved with the spill will meet with facility management to determine what steps can be taken to prevent other spills. These individuals will also assess the response to the release and implement any steps that may make a future spill response more efficient.

CT DEEP's Emergency Response and Spill Prevention Division

A Notification of Noncompliance must be submitted electronically to CT DEEP as soon as there is knowledge of any spill, leak, release, or discharge of non-stormwater not authorized by this permit or another permit. Copies of the completed Notification of Noncompliance and associated follow-up reports should be maintained in *Appendix I*.

The Regulations of Connecticut State Agencies (RCSA) Section 22a-450-1 through -6 (revised March 8, 2022) require petroleum spills and other discharges of hazardous materials to be reported to DEEP at 860-424-3338 within 1 hour of discovery. Release reporting is required to be conducted in accordance with the Connecticut Release Reporting Regulations – Reportable Quantities flow chart included in *Appendix D*.

Additionally, the Town of Putnam Fire Marshal and local police or fire department should be notified of any release that could migrate off-site or pose a threat to human health or welfare.

National Response Center

Certain releases of oil to waters of the U.S. are reportable to the National Response Center. They include:

1. Sheen formed on a water body
2. Sludge or emulsions deposited beneath the surface of a water body

3. Exceedances of water quality standards

Waters of the U.S. have been interpreted to include wetlands, municipal sewer systems, storm sewers, and any tributary that may lead to a navigable waterway.

Also, if the spill reaches the environment and if the volume of the spill exceeds the Reportable Quantity (RQ), as defined by 40 CFR Part 302, the emergency coordinator will notify the National Response Center. In the event of a reportable release, the Emergency Coordinator will notify the National Response Center as soon as possible at (800) 424-8802 with a goal of reporting within 15 minutes.

Environmental Protection Agency

In accordance with 40 CFR 112.4, a report to the Environmental Protection Agency (EPA) must be submitted if the spill incident(s) meets either of the following criteria:

1. A discharge of more than 1,000 gallons of oil into navigable waters in a single spill event occurs.
2. A discharge of more than 42 gallons of oil in two spill events within any consecutive 12-month period into the navigable waters of the US.

Within sixty (60) days of the occurrence of either of these conditions, the following information will be submitted in the report to the Regional Administrator (Region I) of the EPA:

1. Name of the facility
2. Reporter's name
3. Location of the facility
4. Maximum storage or handling capacity of the facility and normal daily throughput
5. Corrective action and countermeasures the facility has taken, including a description of equipment repairs and replacements
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary
7. The cause of such discharge as described in 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred
8. Additional preventive measures the facility has taken or contemplated to minimize the possibility of recurrence
9. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

A copy of all information provided to the EPA Regional Administrator will likewise be provided at the same time to the CT DEEP. All information provided to the EPA and the CT DEEP will be maintained in *Appendix C* or in facility files.

4.7.4 Spill Response Equipment

There are four (5) spill response kits on-site:

- Loading dock area
- Outside near the 2,000-gallon AST
- Inside at the chrome plating area
- Inside near the flammable cabinet
- In the electroless nickel area

The following spill control and emergency equipment is maintained at the facility. This equipment is available for use in response to spills, leaks, and other releases which could impact stormwater:

- Portable fire extinguishers
- Safety glasses
- Nitrile gloves
- Chemical resistant gloves
- Granular absorbent
- Phones with intercom throughout the building
- Absorbent pads, pillows, and socks
- Brooms and shovels
- Disposal bags
- Drums and buckets
- Barrier dikes

4.8 Sediment and Erosion Control

The developed portion of the site is mostly impervious areas, with much of the area covered by pavement and the facility buildings. Therefore, the potential for soil erosion into the stormwater system is minimal. Sediment carried by sheet flow runoff during storm events is captured in the onsite catch basins and accumulates on paved surfaces which are swept as needed. Pervious areas are stabilized with adequate vegetive cover, such as grass and shrubs, which helps prevent soil erosion. The discharge associated with Outfall 1 flows into rip rap to slow flow and prevent erosion of the embankment prior to draining to the wooded area on site. Additional sediment and erosion control measures related to future construction is discussed further in *Section 4.9*.

4.9 Future Construction

Any future construction activity that disturbs more than one acre will be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (as amended). All construction activities, regardless of size, will comply with the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Connecticut Stormwater Quality Manual for the design and implementation of post-construction stormwater management measures. Wherever possible, National Chromium will avoid the use of copper or galvanized roofing or building materials for any new building construction where these materials will be exposed to stormwater.

4.10 Preventative Maintenance

National Chromium implements a preventative maintenance program to ensure that all stormwater control measures equipment, and systems are properly maintained and remain effective in minimizing pollutants and potential impacts to stormwater. The program includes routine inspections, maintenance, and implementing

corrective action (as necessary), to address any issues that could compromise stormwater quality. The following preventative maintenance practices are implemented at the facility:

- Stormwater management structures, including catch basins, roof drains, and outfalls, are routinely inspected to confirm that they are in good working condition and free of debris or damage that could impact stormwater.
- Onsite equipment and systems are periodically inspected, serviced, and tested as needed to identify conditions that could result in leaks, spills, or failures which could result in the discharge of pollutants to surface waters.
- Preventative maintenance also includes ensuring non-structural control measures, such as employee training, good housekeeping practices, and availability of spill response supplies are maintained and are effective.
- Catch basins are cleaned whenever accumulated debris reaches half of the sump depth.
- Stormwater control measures are maintained as necessary to keep them effective and in good working condition. Any control measures determined not to be adequate are promptly repaired or replaced.

If a stormwater control measure fails or is determined to be ineffective, the facility will take all reasonable steps to prevent or minimize pollutant discharges during any subsequent storm events. National Chromium must follow the steps and timelines described in *Section 8* of this SWPPP, when any of the following occur:

- Repair or replacement of stormwater controls measures are required.
- Temporary measures or cleanup activities are needed until final repairs or replacements of stormwater control measures can be implemented.
- Completion of stormwater control measure repairs or replacements will exceed fourteen (14) calendar days from the time the issue is discovered.
- A stormwater control measure was not installed, installed incorrectly, or it does not meet the requirements of the General Permit.
- A control measure is not being properly operated or maintained.

4.11 Management of Stormwater

National Chromium implements stormwater management practices designed to minimize pollutant discharges through effective control of runoff, run-on, and infiltration. Stormwater is managed through a network of catch basins, paved surfaces, and site grading that directs runoff to designated drainage points. Because industrial operations at the site are conducted indoors and outdoor storage is minimal, additional structural treatment systems (e.g., vegetated swales, swirl separators, retention basins) are not necessary. Instead, non-structural control measures, such as good housekeeping, preventative maintenance, employee training, spill prevention and response, and material management are implemented to minimize impacts to stormwater.

Catch basins are inspected as part of the monthly and semi-annual comprehensive inspections. Any excessive sediment accumulation, debris, or signs of damage are documented in the inspections log and corrective actions will be implemented.

Stormwater run-on from adjacent properties is not anticipated due to existing grading and curbing around the site, which is effectively direct off-site flow away from the facility. No additional diversion or interceptor control are required. Limited stormwater runoff may flow onto grassed or landscaped areas, where it is naturally absorbed. These areas are not considered engineered infiltration practices but provide incidental filtration and help reduce runoff volume.

4.12 Infiltration and Groundwater Quality Protection

No additional infiltration systems are required at this time. Any future infiltration practices will comply with the General Permit and Connecticut Stormwater Quality Manual.

4.13 Employee Training

Facility personnel who work in areas where industrial materials or activities are exposed to stormwater, who are responsible for implementing activities required to comply with the General Permit, or whose activities may otherwise affect stormwater quality must receive training on the components and goals of the SWPPP within ninety (90) days of hire and at least once a year thereafter. This requirement applies to members of the Stormwater Pollution Prevention Team, personnel who are involved in the design, installation, maintenance, and/or repair of stormwater control measures, personnel responsible for storing or handling chemicals/materials that could impact stormwater quality, and personnel who conduct or document inspections, monitoring, and corrective actions. Training will be conducted or supervised by a member of the Stormwater Pollution Prevention Team or other qualified personnel. A training outline, an example sign-in sheet, and records of employee training will be maintained in *Appendix E*.

4.14 Resiliency Measures

National Chromium has evaluated potential risks from extreme weather events, including heavy precipitation, flooding, and hurricanes, and has considered resiliency when selecting stormwater control measures implemented at the facility. Given the facility's proximity to the Little River, additional resiliency measures have been evaluated. This includes temporarily reducing or eliminating outdoor storage to the extent possible. Where outdoor storage cannot be avoided, materials may be placed on elevated platforms or under cover. In addition, National Chromium will consider temporarily relocating mobile equipment, containers, or other movable materials to higher ground when major storms or flood events are anticipated. As needed, resiliency control measures and associated emergency procedures will be reevaluated and communicated to applicable personnel during SWPPP training to ensure they can be implemented effectively before, during, and after significant storm events.

4.15 Sector-Specific Control Measures (Sector AA)

National Chromium is regulated under *Sector AA – Fabricated Metal Products*. In accordance with the General Permit, National Chromium will implement the following control measures in addition to what was listed Section 4:

- Good Housekeeping as follows:
    - Raw Steel Handling Storage-National Chromium stores and handles all raw steel indoors, as such, this requirement in the General Permit does not apply to this facility. All discarded metal is disposed of in the proper dumpsters on site.
    - Paints and Painting Equipment- National Chromium does not perform any painting at the facility, as such, this requirement in the General Permit does not apply to this facility.

- Spill Prevention and Response Procedures as follows:

    - Metal Fabricating Areas- National Chromium does not perform any metal fabricating at this facility, as such, this requirement in the General Permit does not apply to this facility.
    - Storage Areas for Raw Metal- National Chromium stores all raw metal indoors, as such, this requirement does not apply to this facility.
    - Metal Working Fluid Storage Areas- National Chromium does not have any metal working fluid storage areas, as such, this requirement in the General Permit does not apply to this facility.
    - Cleaners and Rinse Water- National Chromium controls and cleans up spills of solvents and other liquid cleaners, control sand buildup and disbursement from sandblasting operations, and prevent exposure of recyclable wastes. National Chromium will substitute environmentally benign cleaners when possible.
    - Lubricating Oil and Hydraulic Fluid Operations- National Chromium does not have any lubricating oil and hydraulic fluid operations at the facility, as such, this requirement in the General Permit foes not apply to this facility.
    - Spills and Leaks- National Chromium pays special attention to the following materials (at a minimum): chromium, toluene, sulfuric acid, and other water priority chemicals, and hazardous chemicals and wastes. National Chromium does not use pickle liquor or zinc at the facility. National Chromium stores everything indoors and any loading/unloading is performed under a covered loading dock.
    - Inspections- National Chromium will include the following areas in all inspections: raw metal storage areas, finished product storage areas, material and chemical storage areas, spent solvents and chemical storage areas, recycling areas, loading and unloading areas, equipment storage areas, paint areas, drainage from roof and vehicle fueling and maintenance areas. Potential pollutants include chromium, lubricating oil, solvents, aluminum, oil and grease, methyl ethyl ketone, steel, and related materials.

5 Inspections and Assessments

National Chromium will conduct monthly routine site inspections, quarterly visual stormwater assessments, and semi-annual comprehensive site inspections in accordance with the requirements of the General Permit. These inspections are intended to identify actual and potential issues, verify that good housekeeping practices are being implemented, and detect any conditions that could result in the release of pollutants to stormwater. Inspections will be performed by qualified personnel, such as members of the Stormwater Pollution Prevention Team, using the appropriate forms provided in in this Plan. Completed inspection forms will be maintained within the SWPPP or facility files for a minimum of five (5) years.

The inspection findings will be reviewed with the Plan Manager, who will arrange for the appropriate corrective actions in response to any actual or potential problem identified. Corrective actions will be documented directly on the inspection report, and follow-up will be conducted to confirm that issues have been resolved. Copies of all inspection reports and related follow-up documentation will be maintained on-site in accordance with SWPPP recordkeeping requirements. A detailed description of the required inspection and assessment required to be performed in accordance with the General Permit is provided in the following sections.

5.1 Monthly Routine Inspections

National Chromium will perform monthly inspections of facility areas with potential for stormwater pollution. These areas include, but are not limited to:

- Material loading/unloading areas
- Municipal waste/recycling dumpsters
- Outdoor storage areas
- Paved parking lots/transportation routes
- Exterior of building/roof surfaces
- Air handling equipment
- Stormwater drainage structures (catch basins, outfall, roof leaders)
- Areas where spills and leaks have occurred in the past three years

Monthly inspections will occur during normal operating hours and consist of a visual inspection of the facility, including an evaluation of stormwater management and implementation of control measures. At least one routine inspection during each calendar year should occur when a stormwater discharge is occurring.

5.2 Quarterly Visual Assessments of Stormwater Discharges

Grab samples for visual and olfactory observation will be collected on a quarterly basis from Outfall 1. Samples will be collected in a clear, colorless glass or plastic container and evaluated in a well-lit area as soon as possible after samples collection for the water quality characteristics specified in *Table 5*. The quarterly periods begin on January 1, April 1, July 1, and October 1. Because the facility is in an area that typically experiences snow at least once during a 12-month period, at least one quarterly visual assessment will be performed to capture a snowmelt discharge, if feasible. Samples will be obtained from storm events occurring at least seventy-two (72) hours after any previous storm event generating a stormwater discharge.

A sampling procedure, including a description of required equipment and forms to record storm information and sample observations, is provided in *Appendix H*. Whenever a visual assessment indicates evidence of stormwater pollution, National Chromium will initiate corrective action procedures as outlined in *Section 8*. If adverse weather conditions prevent the collection of quarterly visual samples, a substitute sample will be collected during the next qualifying storm event and documentation of the rationale for not completing the assessment will be kept with the SWPPP.

5.3 Semi-Annual Comprehensive Inspections

National Chromium will conduct a semi-annual comprehensive inspection annually during the fall and spring during normal facility operating hours. These inspections will include all areas of the facility that are exposed to stormwater or that are associated with the stormwater pollution prevention measures, including the following:

- Drainage areas
- Buildings, structures, permanent cover, and impervious area
- Structural control measures (i.e. grading, curbing, baghouses, secondary containment, catch basins, holding tank)

- Non-structural control measures (i.e. materials management practices employed to minimize contact of materials with stormwater run-off; employee training, all the elements of good housekeeping)
- Stormwater management systems
- Stormwater discharge points
- Areas where industrial materials or activities are exposed to stormwater
- Areas identified as potential pollutant sources
- Spill prevention and response procedures
- Resiliency measures (i.e. plans designed to minimize impacts from extreme precipitation events)

To document completion of the semi-annual comprehensive inspection, National Chromium will complete both the routine monthly inspection form and the supplemental semi-annual comprehensive inspection form. Whenever feasible, the semi-annual comprehensive inspection will be conducted during a rainfall event to allow for direct observation of the stormwater discharge and effectiveness of the associated control measures.

5.4 Inspection Report Documentation

National Chromium will document findings of monthly routine inspections, quarterly visual assessments, and semi-annual comprehensive inspections using the forms provided in *Appendix F*. These completed forms will be maintained onsite with the SWPPP or in facility files for a minimum of five (5) years and must remain accessible in either hard copy or electronic format. Inspection reports are not required to be submitted to CT DEEP unless specifically requested. However, any incidents of noncompliance that constitute a permit violation must be reported to CT DEEP through the Water Permitting and Enforcement Divisions (WPED) Online Noncompliance reporting platform. A written set of tracking and follow-up procedures will be used to ensure that appropriate corrective actions are taken in response to inspection findings. Each inspection report will identify whether corrective action is required and will be updated to document the actions taken to correct the deficiency.

6 Monitoring Program

In accordance with Section 4.5 of the General Permit, National Chromium will perform stormwater monitoring on an annual, quarterly, and semi-annual basis. The parameters required for annual monitoring can be included with one of the semi-annual monitoring events. The sampling location and procedures are described below. Copies of stormwater discharge monitoring reports and associated documentation will be maintained in *Appendix G* or in facility files. Stormwater monitoring will be performed for the parameters and frequency detailed in *Table 5*.

National Chromium did not perform chemical stormwater monitoring analysis in the previous permit term. The last sample was taken and analyzed in 2016, when the benchmark monitoring requirements were fulfilled, as referenced in *Table 7.* Stormwater monitoring will be completed by qualified personnel, including members of the Stormwater Pollution Prevention Team, other trained facility personnel, or qualified consultants engaged by the facility.

6.1 Discharge Identification

6.1.1 Sample Location

One stormwater outfall exists on the site (Outfall 1), as shown in *Figure 2*. The drainage areas and their estimated runoff coefficients are identified in *Table 2*. The outfall location is described below.

- Outfall 1 – Outside the southeast corner of the building on a rip rap embankment. Samples will be collected from the plastic pipe prior to discharge to the wooded area of the property.

6.2 Stormwater Sampling Procedures

6.2.1 Qualifying Storm Event

Samples will be collected from discharges resulting from a storm event that occurs at least 72 hours (three days) after any previous storm event generating a stormwater discharge. The sample may contain snow or ice melt, provided it is indicated within the Stormwater Monitoring Report form. Information provided by the National Oceanic and Atmospheric Administration (NOAA), or other recognized weather service, will be used to determine total rainfall for the storm event and the duration between the storm event sampled and the end of the previous measurable event.

6.2.2 Sample Collection and Analysis

Stormwater samples will be collected as discrete grab samples at each designated outfall. At no time will stormwater samples be mixed with or combined with any other waste or process water. Collection of grab samples will begin during the first thirty (30) minutes of a storm event discharge. If it is not possible to collect the samples within the first 30 minutes of an actual discharge from a storm event, the samples must be collected as soon as possible. The facility must document the reason(s) why sample collection within the first thirty (30) minutes was not feasible. All discharge samples must be collected during the same storm event, if feasible. For sites that discharge through a detention basin or other stormwater management structure, the sample must be collected at the discharge from the basin or structure. Stormwater samples will be analyzed for the parameters identified in *Table 5* by a Connecticut certified laboratory. *Appendix H* provides a sampling procedure and forms to record storm information and observations. The following sections discuss the requirements for sampling and data collection for each of the required sample frequencies.

6.2.3 Benchmark Monitoring

Grab samples for chemical analysis will be collected on a semi-annual basis by a member of the pollution prevention team or their designee and analyzed by a Connecticut certified laboratory. All samples will be collected, handled, and analyzed in accordance with EPA-approved methods under 40 CFR 136. The two semi-annual monitoring periods are January 1 through June 30 and from July 1 through December 31, with monitoring events separated by at least thirty (30) days. Samples will be analyzed for parameters listed in *Table 5*.

For each event, storm related information, including the discharge location, sample date and time, discharge start time, duration since prior storm event, and the person(s) who collected the sample will be documented using the field data sheets provided in *Appendix H*. Laboratory reports will include the sample results, date and time analyses were initiated, an analytical methods used, and will be maintained with the completed Stormwater Monitoring Report. Semi-annual samples may be collected concurrently with quarterly samples. Monitoring results will be submitted to the DEEP as detailed in *Section 7.1* of this Plan. Completed discharge monitoring reports (DMRs) and all associated sampling documentation will be maintained in *Appendix G* or in facility files.
See *Section 6.3* and *Section 6.4* for discussions on General Permit allowances for an "inability to collect a sample" and reducing the number of analytical parameters, respectively.

6.2.4 Annual Toxicity Monitoring

Grab samples for toxicity analysis will be collected once during the first year of permit coverage by a Connecticut certified laboratory. Aquatic toxicity testing requirements apply to each discharge point authorized under the General Permit, unless exempt as a substantially identical discharge point (SIDP). The toxicity sample will be collected concurrently during the semi-annual monitoring event. If toxicity is detected, National Chromium must evaluate and, if necessary, modify stormwater control measures to maintain compliance with the Connecticut water quality standards. Results will be submitted to the DEEP as detailed in *Section 7.1* of this Plan.

6.2.5 Annual Impaired Waters Monitoring

Stormwater from Outfall 1 flows to the Little River (Waterbody Segment: CT3708-00_01). Based on a review DEEP's *Water Quality Plans and Assessment Map* and *Integrated Water Quality Report*, this receiving waterbody is listed as impaired for recreation due to Escherichia coli (E-coli) bacteria. An established Total Maximum Daily Load (TMDL) has not been developed for this parameter.

In accordance with Section 4.5.5.1(a) of the General Permit, facilities discharging to an impaired waterbody without an established TMDL are required to perform annual monitoring for the pollutant(s) causing the impairment. As such, National Chromium will conduct annual monitoring for E coli. The impaired waters sample will be collected concurrently with one of the semi-annual benchmark monitoring events.

Analytical results will be documented in a Discharge Monitoring Report (DMR) and submitted to CT DEEP in accordance with the procedures described in *Section 7.1* of this Plan. If monitoring results indicate that stormwater discharge may be contributing to the impairment, National Chromium will evaluate the effectiveness of existing stormwater control measures and implement appropriate corrective actions. All corrective actions and follow-up activities will be documented in *Appendix I* of this Plan.

6.2.6 Other Monitoring as Required by the Commissioner

CT DEEP may notify the facility of additional stormwater discharge monitoring requirements determined to be necessary to meet the permit's effluent limits. The notice will state the reasons for the monitoring, monitoring locations, parameters to be monitored, the frequency and period of monitoring, sample types, and reporting requirements.

6.3 Inability to Collect Samples

If no discharge occurs during a monitoring period, a Discharge Monitoring Report (DMR) must be submitted electronically to CT DEEP using the appropriate No Data Indicator (NODI) code. Reason(s) no discharge occurred may include the following:

- Absence of a 72-hour period of dry weather
- Absence of a storm event that produces a stormwater discharge
- Absence of a discharge from a detention or retention basin
- Adverse weather conditions (e.g., local flooding, high winds, electrical storms) that prevent access to a stormwater discharge location or make sampling impractical (e.g., frozen conditions)

When adverse weather prevents sample collection, National Chromium must collect a substitute sample during the next qualifying storm event. Timing of a storm event is not an acceptable reason to failure to sample, unless it prevents analysis of a parameter within the acceptable laboratory hold time. Adverse weather does not exempt the facility from having to file a DMR in accordance with the established sampling schedule. Any failure to monitor during the regular reporting period must be reported on the DMR.

6.4 Exemptions from Monitoring

If the average of four (4) consecutive measurements for a parameter is below the benchmark threshold, National Chromium may qualify for a temporary exemption from monitoring that parameter. Monitoring can be suspended for that parameter for up to two (2) years at a time. However, an exemption for sample pH cannot be granted until exemptions for all other parameters have been achieved.

National Chromium will notify DEEP by email at DEEP.StormwaterIndustrial@ct.gov of any of the following changes to monitoring frequency:

- All benchmark monitoring requirements have been fulfilled.
- All impaired waters monitoring requirements have been fulfilled for the permit term.
- Benchmark monitoring no longer applies because the DEEP has concurred with the assessment that run-on from a neighboring source is the cause of the exceedance.
- Benchmark and/or impaired waters monitoring requirements no longer apply because the facility is inactive and unstaffed or
- Benchmark and/or impaired waters monitoring requirements now apply because the facility has changed from inactive and unstaffed to active and staffed.

6.5 "Run-On" or Natural Background Pollutant Levels Exemption

If an exceedance of a benchmark threshold is attributable solely to the presence of that parameter in "run-on" entering from off-site or natural background pollutant levels, National Chromium is not required to perform corrective action or additional benchmark monitoring provided the following conditions are met:

- The statistical average concentration of the benchmark monitoring results for a parameter is less than or equal to the parameter concentration in "run-on" entering from off-site or natural background pollutant levels.
- National Chromium documents in the SWPPP supporting rationale for concluding that benchmark exceedances are attributable solely to off-site or natural background pollutant levels, including any data previously collected by the facility or others.
- National Chromium demonstrates that diversion of "run-on" from off-site containing these pollutant levels is not feasible through engineering analysis.
- National Chromium notifies the CT DEEP of the findings and is issued a written approval of the documentation demonstrating that the benchmark exceedances are attributable solely to "run-on" entering from off-site or natural background pollutant levels.

Natural background pollutants include substances naturally occurring in rainfall, soils, or groundwater and do not include "run-on" entering from legacy activity or pollution.

7 Reporting Requirements

National Chromium will comply with all the reporting requirements of the General Permit, including the timely submission of monitoring results, annual reports, and any notification required to be submitted DEEP. A description of the required reporting and notification procedures is provided below.

7.1 Discharge Monitoring Reports

National Chromium is required to submit hard copy Discharge Monitoring Reports (DMRs) via email to DEEP.StormwaterIndustrial@ct.gov until receipt of the Notice of Coverage letter is received.

The Notice of Coverage letter will provide directions on how to submit DMRs electronically in EPAs online reporting tool (i.e., NetDMR). After receipt of the letter DMRs must be submitted electronically within thirty (30) days after the end of the monitoring period. For any monitored discharge point with no discharge during the reporting period, National Chromium will indicate "no discharge" on the DMR using the appropriate No Data Indicator (NODI) code no later than thirty (30) days after the end of the reporting period. If monitoring results indicate a violation of a numeric effluent limit, the violation must be reported to DEEP within two (2) hours using the online notification form.

Once all applicable monitoring requirements have been fully satisfied, the facility is no longer required to conduct monitoring or submit results through NetDMR. However, if only a portion of the benchmark monitoring and/or impaired waters requirements have been fulfilled (e.g., the four consecutive semi-annual averages are below the benchmark for some, but not all parameters; or the permittee did not detect some, but not all impairment pollutants), the facility must continue reporting results for parameters that remain subject to monitoring.

7.2 Annual Report

An annual report must be prepared and submitted by April 15th after each calendar year electronically to DEEP.StormwaterIndustrial@ct.gov. The report must be submitted using the template provided by DEEP. A copy of each completed annual report will be maintained in *Appendix F* or the facility files. Each annual report will include, at a minimum, the following information from the previous year:

- Summary of monitoring data
- Summary of site inspections
- Summary of visual assessments
- Summary of corrective actions and non-compliance notifications
- Documentation of any incidents of noncompliance or statement of compliance
- Signed certification

7.3 Additional Reporting and Recordkeeping Requirements

Immediate reporting to DEEP is required orally as soon as the facility has knowledge of any non-compliance that may endanger health or the environment. For any spill, leak, release, or discharge of non-stormwater not authorized by this or another permit, the facility must immediately contact CT DEEP Emergency Response and Spill Prevention at 860-424-3338. In addition, National Chromium will notify DEEP by email at DEEP.StormwaterIndustrial@ct.gov of the following conditions:

- Planned changes prior to any physical alteration or additions to the permitted facility that could significantly change the nature or increase the quantity of pollutants discharged.
- Any anticipated activity or condition that may result in noncompliance with the permit requirements.
- Compliance or noncompliance reports, or any progress reports on interim and final requirements in any compliance schedule.
- Submission of facts or information if the facility becomes aware of previously omitted information, or incorrect information submitted in the registration or in any report.

8 Corrective Actions

Conditions detected through inspections, stormwater monitoring, by the CT DEEP, or other means may require corrective actions so that permit conditions are met and discharges of pollutants in stormwater are minimized. The following sections detail the types of conditions requiring corrective action. A general schedule associated with corrective action implementation is outlined in *Section 8.9*. The required corrective actions for each triggering condition are described in *Sections 8.1* through *8.8* and summarized in *Table 6*. Failure to complete corrective actions when necessary is considered a permit violation. In determining enforcement response, CT DEEP will consider the appropriateness and timeliness of corrective actions taken.

For those corrective action triggering conditions that require or recommend follow-up sampling, the facility must collect follow-up sample within thirty (30) calendar days after implementing applicable Corrective Action Measures (i.e., CAMs Level 1, 2, or 3) or during the next qualifying storm event if none occurs within that period. The facility must submit follow-up sample results by email to DEEP.StormwaterIndustrial@ct.gov within thirty (30) days of receiving the laboratory analytical results. All corrective actions and follow-up actions must be documented using the DEEP's *Corrective Action Measures Requirements & Waiver Request* form. A blank copy of this form is included in *Appendix I* and completed forms and supporting documentation must be maintained in *Appendix I* of this Plan.

8.1 Benchmark Threshold Exceedance

An exceedance of a benchmark threshold for a parameter can occur if:

- The average of four consecutive semi-annual samples (or, if applicable four consecutive quarterly samples) for a parameter exceeds the benchmark threshold for that parameter.
- Fewer than four consecutive semi-annual samples (or, if applicable four consecutive quarterly samples) are collected, but a single sample or the sum of those sample results exceeds the benchmark threshold for a parameter by more than four times (i.e., the measured value is mathematically certain to exceed the four-event average).

Follow-up monitoring is required to be completed after implementation of any Corrective Action Measure (CAM) (i.e. CAM Level 1, 2, or 3) to address the exceedance of a 4-event benchmark average (or mathematical equivalent). The deadlines for implementation of CAMs are detailed in *Section 8.9*. A benchmark exceedance is not a permit violation. However, failure to take corrective action when a benchmark value exceeds the four-event average (or is mathematically certain to do so) is a permit violation.

8.1.1 Corrective Action Measure Level 1

In the event of a CAM Level 1, National Chromium will review the SWPPP and existing stormwater control measures to evaluate their effectiveness and determine if any modifications are necessary for the discharge to meet the benchmark threshold for the applicable parameter or address the initial corrective action triggering condition. Some examples include the following:

- Review potential sources of pollution, spill response procedures, and non-stormwater discharges
- Conduct a single comprehensive clean-up
- Make a subcontractor change
- Increase frequency of inspections

Following review of the SWPPP and stormwater control measures, the facility must implement a new control measure that would be expected to resolve the issue and ensure compliance with the permit. If determined that no further actions are necessary, the rationale for this determination must be documented *Appendix I* of this Plan.

8.1.2 Corrective Action Measure Level 2

If after steps taken for CAM Level 1, subsequent inspection and/or follow-up monitoring continue to result in the condition requiring corrective action, National Chromium will complete a comprehensive review of the SWPPP, implement additional stormwater control measures (e.g., pollution prevention practices, good housekeeping measures) beyond those already in place. Any new or modified control measures will consider good engineering practices and will go beyond the initial response measures, with the goal of reducing or eliminating the release of pollutants in the stormwater discharge.

8.1.3 Corrective Action Measure Level 3

If, after implementation of CAM Level 2 measures, subsequent inspection and/or follow-up monitoring data indicate that the same corrective action trigger has occurred for the third time, National Chromium will implement structural control measures with sufficient pollutant efficiency to address the exceedances examples of potential structural controls include:

- Structural Controls: permanent cover, berms, or secondary containment,
- Stormwater Treatment Control: sand filters, hydrodynamic separator, oil-water separator, retention ponds, retention ponds, infiltration structures (where appropriate)

The selected control measure will be appropriate for the pollutant(s) triggering the Level 3 exceedance and will be more rigorous than the pollution prevention and good housekeeping measures implemented under CAM Level 2. If the triggering conditions continues to persist the CT DEEP may require application for an individual permit.

8.2 Effluent Limit Exceedance

National Chromium is regulated under Sector AA of the General Permit, which covers Fabricated Metal Products. Sector AA does not have associated numeric effluent limits. Therefore, implementation of corrective action measures related to exceedances of numeric effluent limits is not applicable to this facility.

8.3 Unauthorized Release or Discharge

An unauthorized release or discharge, including a spill, leak, or discharge of non-stormwater not authorized by the General Permit or another NPDES permit requires implementation of a CAM. Failure to take corrective action following an unauthorized release or discharge is a permit violation.

Upon discovery of an authorized release, National Chromium will take the following corrective actions:

1. Take all reasonable steps to contain and clean up release using absorbent materials, barriers, or other measures to prevent the discharge of pollutants from entering surface waters.
2. Immediately submit a Notification of Noncompliance electronically through DEEP's website: CT DEEP Non-Compliance Notification Reporting
3. For any unauthorized release to the stormwater system containing a hazardous substance or oil in an amount equal to or in excess of a Reportable Quantity established under either 40 CFR 110, 40 CFR 117, or 40 CFR 302 that occurred during a 24-hour period, immediately notify the CT DEEP Emergency Response and Spill Prevention Division at (860) 424-3338 or toll-free at (866) 337-7745.

All incidents of authorized discharges, associated CAMs, and follow-up monitoring must be documented using the form provided *Appendix I* of the SWPPP

8.4 Inconsistency with Applicable TMDL

If the facility directly discharges to an impaired waterbody, the CT DEEP may determine that the discharge is inconsistent with the assumptions and requirements of the applicable TMDL and its Waste Load Allocation (WLA), and as a result triggering a CAM. National Chromium does not directly discharge to an impaired waterbody, as such, this section is not applicable to this facility.

8.5 Control Measures Not Stringent Enough to Meet Water Quality Standards

Corrective actions may be required if existing stormwater control measures are not sufficient to protect the waters of the state from stormwater pollution or receiving waters are not meeting applicable water quality standards. The CT DEEP will notify the facility if a CAM is necessary for a discharge to be consistent with the relevant water quality standards or if coverage under an individual permit is required.

The facility must review and revise (as appropriate) the SWPPP, including sources of pollution, spill and leak procedures, non-stormwater discharges, and selection, design, installation, and implementation of stormwater control measures. DEEP will notify the facility if follow-up monitoring is required to demonstrate compliance with the applicable water quality standards. Any notifications provided by DEEP of a violation of water quality standards and any follow-up corrective actions and/or monitoring must be documented using the form provided in *Appendix I*. Failure to implement corrective actions prescribed by the CT DEEP is a permit violation.

8.6 Control Measures Never Designed, Installed, Implemented, or Maintained

SCMs may include procedures, practices, or structural devices to minimize or prevent stormwater pollution. SCMs are required to prevent pollutants from entering waters of the state and to ensure compliance with applicable effluent limits, water quality standards, or WLAs. Upon discovery that a required control measure was not designed, installed, implemented, or maintained, the facility must review and revise (as appropriate) the SWPPP, including sources of pollution, spill and leak procedures, non-stormwater discharges, and selection, design, installation, and implementation of stormwater control measures.

National Chromium will review and revise the SWPPP to include, but not limited to, the following:

- Perform inspections and preventative maintenance of stormwater drainage systems, structural controls, treatment systems, and facility equipment that could fail and impact stormwater.
- Diligently maintain nonstructural control measures (e.g., keep spill response supplies available, train the appropriate personnel)
- If dust collectors (e.g., baghouses) are used onsite, inspect equipment at least quarterly to prevent the escape of dust from the system. Immediately remove accumulated dust at the base of exterior dust collectors and in the surrounding environment.
- Clean catch basins when the depth of debris reaches half of the sump depth and keep the debris surface at least 6" below the lowest outlet pipe.

Failure to take corrective action once after determining that a control measure was not properly designed, installed, implemented, or maintained constitutes a permit violation. All corrective actions and any associated follow-up monitoring related to design, installation, implementation, or maintenance of control measures will be documented in the SWPPP. Documentation must include the date(s) the deficiency was identified and the date(s) the corrective measure(s) was implemented or installed. Any corrective actions and/or monitoring will be documented using the form provided in *Appendix I*.

8.7 Change in Design, Operation, or Maintenance

A CAM is triggered if construction or a change in design, operation, or maintenance at the facility significantly alters the nature or significantly increases the quantity of pollutants discharged in stormwater runoff. National Chromium will review and update the SWPPP and associated control measures as necessary. Failure to address these changes, not review the SWPPP, and/or determine if additional control measures are required is a permit violation.

8.8 Visual Assessment Shows Evidence of Pollution

If any inspection (monthly routine, quarterly visual, or semi-annual comprehensive) or other observations identifies color, odor, floating solids, settled solids, suspended solids, or foam in the stormwater discharge, a CAM is triggered. While follow-up monitoring is not required, it is recommended, particularly when visual assessment indicates evidence of pollution in discharge. All corrective actions and any associated follow-up monitoring must be documented using the forms in *Appendix I*, and this documentation must be maintained in the SWPPP. Failure to implement corrective action to address the identified issue constitutes a permit violation. National Chromium will ensure all required documentation is maintained in *Appendix I* of this Plan.

8.9 Corrective Actions Schedule

When conditions requiring corrective actions are identified, National Chromium will implement all necessary measures in accordance with the schedule outlined below and document the completion of all actions, including repairs or improvements, in the SWPPP in a timely manner to ensure that issues are promptly addressed and do not persist.

8.9.1 Immediate Actions (within 1-2 days)

If a CAM is triggered, the facility must immediately take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and operational. The term "immediately" means that the corrective action must be initiated on the same day the condition is identified. However, if the issue is discovered late in the workday, corrective action must begin no later than the following workday. Steps should include actions to assess and address the conditions, such as sweeping, vacuuming, or otherwise removing the exposed material, as well as planning or scheduling the installation of new Best Management practices (BMPs) as needed.

8.9.2 Subsequent Actions (within 14-60 days)

If additional corrective actions are necessary beyond those implemented as immediate measures, the facility must complete corrective actions (e.g., install a new or modified control measure) before the next storm event (if possible) within fourteen (14) calendar days of discovery of the corrective action condition. If it is not feasible to complete the corrective action within the timeframe, the facility must document the reason for the delay and identify a schedule for completion. Corrective action must be completed as soon as practicable but not later than sixty (60) days from discovery. Applicable documentation must be maintained within the SWPPP.

8.9.3 Extension for Corrective Actions (Greater than 60 days)

If the completion of corrective actions cannot be completed within sixty (60) days, the facility may take the minimum additional time necessary to complete the work. In these cases, the SWPPP must be updated with the reason for the extension, revised completion date, and any changes to stormwater control measures or procedures. This information is required to be documented and maintained with the SWPPP within fourteen (14) days of completing the corrective action.

If a Level 3 CAM is triggered and implementation of structural control measures are required, the facility may take up to one hundred and twenty (120) days to complete installation. If installation requires more than 120 days, the facility must request and obtain an extension from CT DEEP.

9 Maintaining the Stormwater Pollution Prevention Plan

9.1 Records Retention

National Chromium will retain copies of the registration, the SWPPP (including any modifications made during the term of the permit), documentation required under the General Permit (including records of corrective actions or exceedance responses), all reports and certifications required by the General Permit, monitoring data, and all data used to prepare the General Permit registration. These records must be maintained for at least five (5) years from the date that coverage under the permit expires or is terminated.

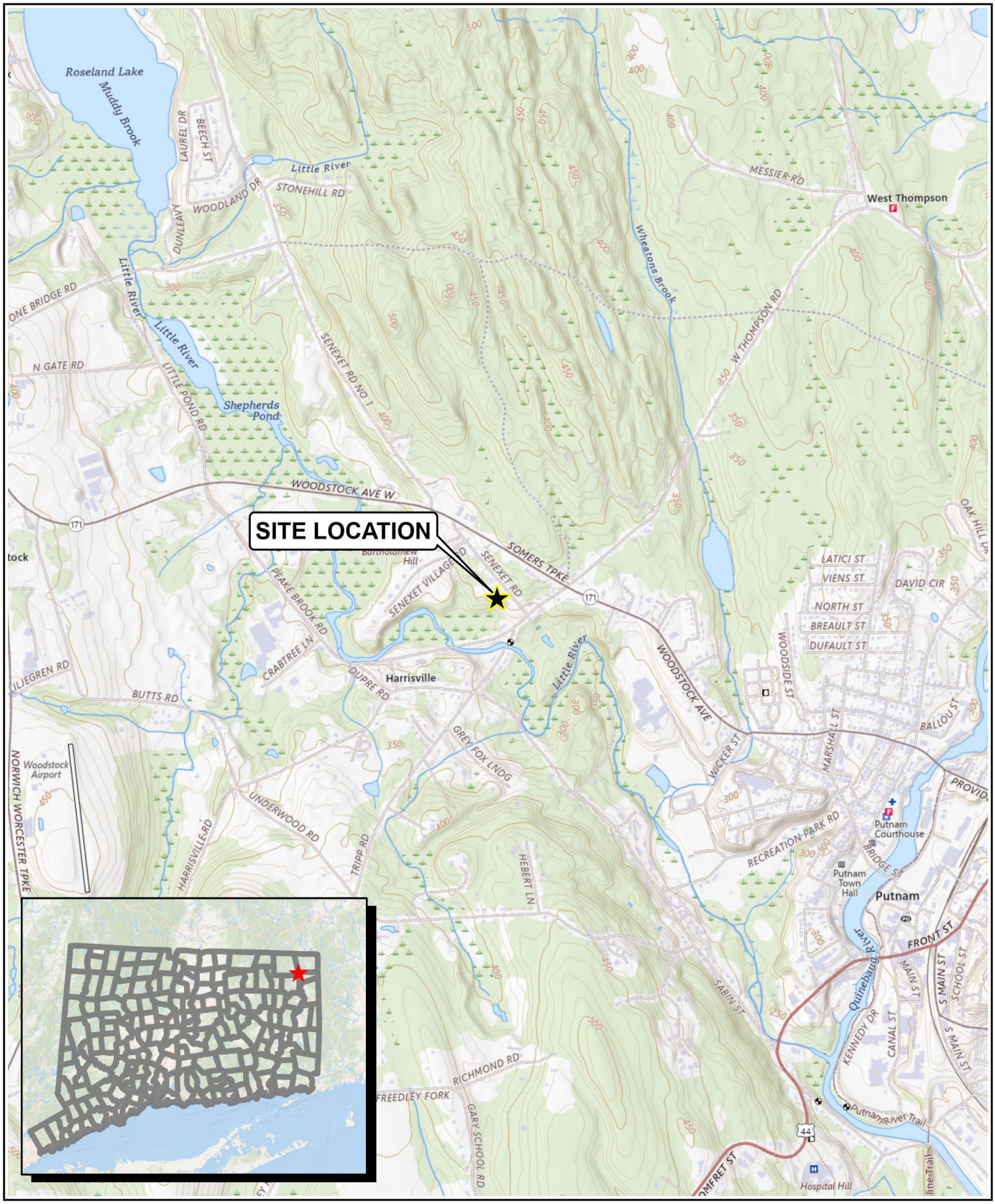
9.2 Plan Review and Amendment Procedure

The SWPPP must be representative of current site conditions throughout facility coverage under the General Permit. National Chromium will review and revise the SWPPP as necessary to include any changes in site conditions or improvements to their stormwater management program. The SWPPP will be amended, and all actions required by the SWPPP will be completed, within one hundred twenty (120) days of when any of the following conditions have occurred:

- There is a change at the site that has an effect on the potential to cause pollution of the surface waters of the state.
- The actions required by the SWPPP fail to ensure or adequately protect against pollution of the surface waters of the state.
- The CT DEEP requests modification of the SWPPP.
- The site is notified that they are subject to requirements because the receiving water to which the industrial activity discharges has been designated as impaired under Section 303(d) of the Clean Water Act and identified in the most recent State of Connecticut Integrated Water Quality Report.
- The site is notified that a Total Maximum Daily Load (TMDL) has been established for the receiving water to which the industrial activity discharges.
- Any significant sources or potential sources of pollution are identified as a result of any inspection or visual monitoring.
- Required as a result of monitoring benchmarks or effluent limits.
- Corrective action is required to be implemented in accordance with the General Permit.

If significant changes are made to the site and the SWPPP (e.g., addition or removal of outdoor storage areas or control measures), the Plan must be re-certified by a Qualified Professional licensed to practice in the State of Connecticut. All certifications will be maintained in *Appendix B*. Amendments to the SWPPP will be coordinated by the Plan Manager and documented in *Appendix J*, with all Stormwater Pollution Prevention Team members notified of the updates.

Figures



Path: C:\Users\tracy.gargano\Desktop\Figure 1.aprx Layout Name: Figure1 Map Name: USGS Fig 1
Date Exported: 2/18/2026 3:06 PM User: Tracy.Gargano Date Saved: 2/17/2026 3:00 PM

N

0 1,000 2,000
Feet

Data Source(s):
1. Parcel boundaries - CT DEEP
2. Basemap - National Geographic TOPO! 1:24,000-scale maps; TOPO! maps are seamless, scanned images of United States Geological Survey (USGS) paper topographic maps. http://goto.arcgisonline.com/maps/USA_Topo_Maps

Site Location Map
National Chromium
10 Senexet Road

PUTNAM CONNECTICUT

FUSS & O'NEILL
1 Financial Plaza, 15 Floor
Hartford, CT 06103
860.646.2469 | www.fando.com

PROJ. No. 20170204.S10
DATE: FEBRUARY 2026

FIGURE 1

NOTES:

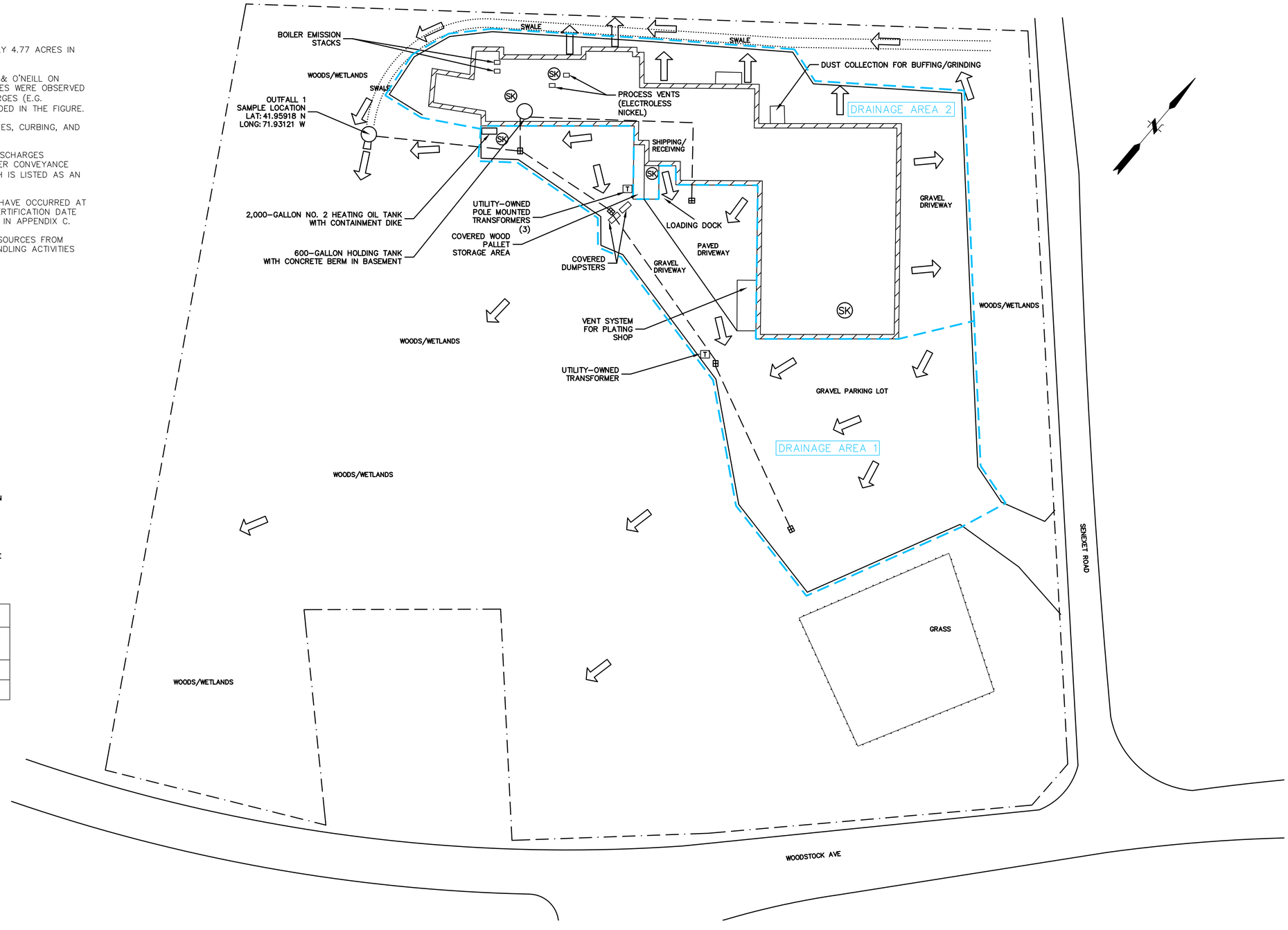
1. THE TOTAL ACREAGE FOR THE SITE IS APPROXIMATELY 4.77 ACRES IN PUTNAM & 3.2 ACRES IN WOODSTOCK.
2. BASED ON A SITE EVALUATION COMPLETED BY FUSS & O'NEILL ON OCTOBER 14, 2025, NO NON-STORMWATER DISCHARGES WERE OBSERVED AT THE SITE. ALLOWABLE NON-STORMWATER DISCHARGES (E.G. LANDSCAPE/LAWN WATERING) HAVE NOT BEEN INCLUDED IN THE FIGURE.
3. IMPERVIOUS AREAS ARE DEFINED BY BUILDING OUTLINES, CURBING, AND PAVED AREAS.
4. STORMWATER RUNOFF FROM THIS SITE ULTIMATELY DISCHARGES SOUTHWEST THROUGH THE UNDERGROUND STORMWATER CONVEYANCE SYSTEM TO THE LITTLE RIVER (CT3708-00_01) WHICH IS LISTED AS AN IMPAIRED WATERBODY.
5. A RECORD OF SIGNIFICANT LEAKS AND SPILLS THAT HAVE OCCURRED AT NATIONAL CHROMIUM THREE YEARS PRIOR TO THE CERTIFICATION DATE OF THIS PLAN TO THE PRESENT WILL BE MAINTAINED IN APPENDIX C.
6. ADDITIONAL DETAILS ON THE POTENTIAL POLLUTANT SOURCES FROM INDUSTRIAL MATERIALS STORAGE AND MATERIALS HANDLING ACTIVITIES ARE INCLUDED IN TABLE 3 IN THE SWPPP.

LEGEND

- SK — SPILL KIT
- SWALE
- BUILDING OUTLINE
- STORM DRAIN PIPING
- CATCH BASIN
- STORMWATER FLOW DIRECTION
- DRAINAGE AREA BOUNDARY
- EDGE OF PAVEMENT
- APPROXIMATE PROPERTY LINE
- T — TRANSFORMER
- METAL FENCE

DRAINAGE AREA TABLE

DRAINAGE AREA	PERVIOUS (ft^2)	IMPERVIOUS (ft^2)
1	0	25888
2	0	28499



SEAL

SEAL

SCALE:
HORZ.: NOT TO SCALE
VERT.:
DATUM:
HORZ.: -
VERT.: -

FUSS & O'NEILL
ONE FINANCIAL PLAZA, 15th FLOOR
HARTFORD, CT 06103
860.646.2469
www.fando.com

NATIONAL CHROMIUM COMPANY, INC.

SITE MAP

STORMWATER POLLUTION PREVENTION PLAN

PUTNAM CONNECTICUT

PROJ. No.: 120.0170204.S10
DATE: FEBRUARY 2026

FIG.2

Tables

Table 1

Stormwater Pollution Prevention Team & Spill Response Contractor Information

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Team Member: John Miller

Title: President, Team Leader

Phone: Office: (860) 928-7965

Email: miller@nationalchromium.com

Responsibilities (Plan Manager):

- Primary contact for SWPPP implementation, development, and compliance
- Ensure the SWPPP is current, accurate, and updated when site conditions change
- Coordinate and document training for Pollution Prevention Team and other personnel
- Coordinate, oversee, and review site inspections, stormwater monitoring, and review sample results
- Direct and document corrective actions to address non-compliance with the permit and assist with selecting or modifying stormwater control measures
- Maintain all reports, certifications, inspection reports, monitoring data, and SWPPP amendments
- Primary contact for CT DEEP and EPA for SWPPP related matters
- Lead and coordinate spill response activities, including cleanup, and regulatory reporting, as applicable
- Ensure Pollution Prevention Team members are informed of updates, amendments, and compliance requirements

Team Member: Ronald Michael Stewart

Title: EC Department Supervisor

Phone: Office: (860) 928-7965

Email: nationalchromium@att.net

Responsibilities (Alternate Plan Manger):

- Back up contact for SWPPP implementation, development, and compliance
- Assist with employee training and ensure staff understand spill response and stormwater procedures
- Assist with coordination of site inspections, stormwater monitoring, and reporting
- Assist with implementation of corrective action(s) and selecting and modifying stormwater control measures, and provide support during spills, non-compliance, or regulatory inspections

Emergency Spill Response Contractors

Republic Services (Primary). ……(800) 899-4672 (Emergency)

Kropp Environmental Contractors, Inc. (Alternate)……..(860) 642-9952 (Emergency)

Table 2

Summary of Drainage Areas [1]
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Drainage Area	Total Area (ft^2)	Impervious Area (ft^2) (%)	Estimated Run-off Coefficient	Description of Exposed Materials within the Drainage Area
1	25,888	25,888 sq. ft. (≈ 100% Impervious)	0.90	• 2,000-gallon # 2 fuel oil AST • Loading and unloading operations • Vehicle, truck, forklift activity • Transformers • Wood pallet storage
2	28,499	28,499 sq. ft. (≈ 100% Impervious)	0.90	• Roof vents • Vehicle traffic

FUSS & O'NEILL

Inventory of Exposed Materials and Associated Pollutants
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Activity/ Exposed Material or Source	Onsite Location of Activity / Material	Associated Pollutants / Constituents	Management Practices / Best Management Practices	Potential Stormwater Exposure
2,000-gallon #2 fuel oil AST	Outside the southeast corner of the building	Oil & Grease, Petroleum Hydrocarbons	Steel secondary containment enclosure, routine inspections for leaks or spills, transfers supervised by trained personnel	Potential exposure to stormwater runoff during precipitation events
Vehicle/Truck/ Forklift Activity	Parking areas & loading/unloading areas	Oil & Grease, Suspended Solids, Metals, COD, Petroleum Hydrocarbons	Routine maintenance of vehicles and equipment, routine inspections	Potential exposure to stormwater runoff during precipitation events
Loading/Unloading Operations	Loading docks along the east wall of the building	Oil & Grease, Suspended Solids, Metals, COD, Petroleum Hydrocarbons	Area inspected during and after transfers, spill kits available	Potential exposure to stormwater runoff during precipitation events
Process Roof Vents	Building Roofs	Suspended Solids, Oil & Grease, Metals	Routine inspections, visible residuals and particulates are removed	If present on roof, potential exposure to stormwater runoff during precipitation events
Transformers (utility owned)	Southeast side of the facility	Oil & Grease, Metals (PCB-free)	Maintained by utility company, inspected periodically	Low potential exposure to stormwater runoff during precipitation events

FUSS & O'NEILL

Inventory of Exposed Materials and Associated Pollutants
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Activity/ Exposed Material or Source	Onsite Location of Activity / Material	Associated Pollutants / Constituents	Management Practices / Best Management Practices	Potential Stormwater Exposure
Wooden Pallets	Near the loading docks	Metals, suspended solids, COD, Oil & Grease	Only new/clean pallets stored outside, broken pallets shipped offsite for disposal	Low potential exposure to stormwater runoff during precipitation events

Note: This table includes a summary of the potential pollutant sources associated with the industrial activities with the potential for exposure to rainfall or snowmelt. Items specified in the table include those present at the facility within the three years prior to the date the SWPPP is prepared or amended.

Table 4

Areas Where Potential Spills and Leaks Could Occur
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Equipment or Area	Description of Potential Spill Event	Direction of Flow	Discharge Point(s) Affected
2,000-gallon # 2 fuel oil Aboveground Storage Tank	Spill or leak due to tank failure, overfill during filling, or piping connection failure	Within secondary containment; if containment fails, flow will migrate radially on the pervious surface towards woods area	Outfall 1
Loading/Unloading area	Spill or leak during transfer of materials into the building	Flow would migrate to the catch basin in the area that is then routed to an inside holding tank before release	Outfall 1
Vehicle and Equipment Parking/ Driveway Areas	Spills or leaks of fluids (oil, fuel, antifreeze) from vehicles and equipment	Flow direction varies depending on location, generally radially following contour of the paved surface	Outfall 1

Table 5

Summary of Stormwater Monitoring Parameters[1.]

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Sampling Frequency[2.]	Monitoring Parameters		Benchmark	Holding Time
Quarterly[3.]	Visual	Color	N/A	N/A
		Odor	N/A	
		Clarity (diminished)	N/A	
		Floating Solids	N/A	
		Settled Solids	N/A	
		Suspended Solids	N/A	
		Foam	N/A	
		Oil Sheen	N/A	
		Other	N/A	
Semi-Annual[4.]	Sample pH		5 – 9 S.U.	Immediate
	Total Oil & Grease (O&G)		5 mg/L	28 Days
	Chemical Oxygen Demand (COD)		75 mg/L	28 Days
	Total Kjeldahl Nitrogen (TKN)		2.3 mg/L	28 Days
	Total Phosphorus (TP)		0.40 mg/L	28 Days
	Total Suspended Solids (TSS)		90 mg/L	7 Days
	Nitrate as Nitrogen (NO_3)		1.10 mg/L	48 Hours
	Copper (Cu)		0.059 mg/L	180 Days
	Lead (Pb)		0.076 mg/L	
	Zinc (Zn)		0.160 mg/L	
	Aluminum (Al)		0.75 mg/L	
Annually	Escherichia Coli[4.]		N/A	6 Hours
	Aquatic Toxicity[5.]		N/A	36 Hours

Notes:

1. The annual, semi-annual, and quarterly monitoring events can be performed concurrently.
2. Quarterly monitoring quarters will begin on January 1, April 1, July 1, and October 1.
3. For semi-annual monitoring, one monitoring event is conducted between January 1 and June 30. The other monitoring event is conducted between July 1 and December 31. Monitoring events must be separated by at least 30 days.
4. Impaired waters monitoring for Escherichia Coli must be collected annually for the duration of the permit, unless notified by DEEP.
5. National Chromium must monitor annually for aquatic toxicity only during the year following the date of authorization of the General Permit. This parameter will be included in a regularly scheduled semi-annual sample.

Table 6

FUSS & O'NEILL

Summary of Triggering Conditions Requiring Corrective Actions Measures

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Triggering Condition	Permit Violation?	Applicable Sectors	Follow-up Sampling	Required Corrective Actions		
Benchmark Threshold Exceedance (4 event average exceeds benchmark threshold or mathematical equivalent)	Yes - If corrective action is not taken	All Sectors	Required	Level 1 (First Exceedance) Review the SWPPP and existing stormwater control measures. Modify existing measures or implement new control measures as appropriate.	Level 2 (Second Exceedance) Review the SWPPP and implement additional stormwater control measures beyond those already in place.	Level 3 (Third Exceedance) Implement structural control measures with sufficient pollutant removal efficiencies to address the exceedance(s).
Effluent Limit Exceedance (A discharge exceeds a numeric effluent limitation guideline)	Yes	A, D, E, J, K, L, S	Required	Submit a Notification of Noncompliance within two (2) hours of discovery. Submit a Noncompliance Follow-Up Report within five (5) days. Follow-up monitoring is required within thirty (30) days of implementing corrective actions, and thirty (30) additional days to report results to DEEP. If follow-up monitoring indicates another exceedance, continue to monitor at least monthly until the discharge is in compliance with the numeric effluent limit(s).		
Unauthorized Release or Discharge (Spill, leak, release, or discharge of unauthorized non-stormwater discharge)	Yes - If corrective action is not taken	All Sectors	Recommended	Immediately contain and clean up the release and submit a Notification of Noncompliance. Documentation of any corrective action measures implemented to prevent recurrence must be maintained in the SWPPP. Any spill, leak, release, or discharge of non-stormwater must immediately the incident to DEEP Emergency Response and Spill Prevention by calling (860) 424-3338 or 1-866-DEP-SPIL (1-866-337-7745).		
Inconsistency with Applicable TMDL and its WLA (Stormwater discharges do not meet the limits or conditions of the applicable TMDL or WLA)	Yes - If corrective action is not taken	All sectors discharging to an impaired water with an applicable TMDL or WLA	Required if notified by DEEP	CT DEEP will inform the facility if corrective action(s) and/or follow-up monitoring are required, or if coverage under an individual permit is necessary.		

FUSS & O'NEILL

Table 6

Summary of Triggering Conditions Requiring Corrective Actions Measures

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Triggering Condition	Permit Violation?	Applicable Sectors	Follow-up Sampling	Required Corrective Actions
Control Measure Not Stringent Enough to Meet Water Quality Standards	Yes - If corrective action is not taken	All Sectors	Required if notified by DEEP	CT DEEP will inform the facility if corrective action(s) and/or follow-up monitoring are required, or if coverage under an individual permit is necessary.
Control Measures Never Designed, Installed, Implemented, or Maintained	Yes - If corrective action is not taken	All Sectors	Recommended	Select, design, install, implement, and maintain stormwater control measures necessary to reduce/minimize the discharge of pollutants in the stormwater discharge. Review and revise the SWPPP (as appropriate). Documentation of any corrective action measures implemented must be maintained in the SWPPP.
Change in Design, Operation, or Maintenance (That significantly changes the nature or increases the quantity of pollutants discharged)	Yes – If corrective action is not taken	All Sectors	Recommended	Modify or select new stormwater control measures to necessary to reduce/minimize the discharge of pollutant in the stormwater discharge. Review and revise the SWPPP (as appropriate). Documentation of any corrective action measures implemented must be maintained in the SWPPP.
Visual Assessment Shows Evidence of Pollution (Color, odor, floating solids, settled solids, suspended solids, or foam observed in discharge water)	Yes - If corrective action is not taken	All Sectors	Recommended	Modify or select new stormwater control measures to necessary to reduce/minimize the discharge of pollutant in the stormwater discharge. Review and revise the SWPPP (as appropriate). Documentation of any corrective action measures implemented must be maintained in the SWPPP.
Other Corrective Actions as Required by the Commissioner (required additional corrective actions in response to permit violations)	Yes - Upon Commissioner's determination	All Sectors	Required if notified by DEEP	CT DEEP will inform the facility if corrective action(s) and/or follow-up monitoring are required, or if coverage under an individual permit is necessary.

Table 7

Summary of Stormwater Monitoring Data Collected During Previous Permit Term

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

National Chromium did not take any stormwater monitoring samples in the previous permit term. Their last sample was in 2016, when the benchmark monitoring requirements were fulfilled.

Appendix A

NPDES General Permit for the Discharge of Stormwater Associated with Industrial Activities

Appendix B

SWPPP Certifications

National Chromium Company, Inc.
10 Senexet Road, Putnam, Connecticut

FUSS & O'NEILL

Registration Certification

"I hereby certify that I am making this certification in connection with a registration under the General Permit for the Discharge of Stormwater Associated with Industrial Activity, submitted to the Commissioner by National Chromium Company, Inc. for an activity located at 10 Senexet Road in Putnam, Connecticut and that all terms and conditions of the general permit are being met for all discharges which have been created, initiated or maintained and such activity is eligible for authorization under such permit. I further certify that a system is in place to ensure that all terms and conditions of this general permit will continue to be met for all discharges authorized by this general permit at the site. I certify that I have personally examined and am familiar with the information that provides the basis for this certification, including but not limited to all information described in Section 2.2.16.1 of such general permit, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining such information, that the information upon which this certification is based is true, accurate and complete to the best of my knowledge and belief. I certify that I have made an affirmative determination in accordance with Section 2.2.16.2 of this general permit. I understand that the registration filed in connection with such general permit is submitted in accordance with and shall comply with the requirements of Section 22a-430b of Regs. Conn. State Agencies. I also understand that knowingly making any false statement made in the submitted information and in this certification may be punishable as a criminal offense, including the possibility of fine and imprisonment, under section 53a-157b of the Regs. Conn. State Agencies and any other applicable law. I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate, and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the Regs. Conn. State Agencies, pursuant to section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute."

2-24-26

John Miller
President
National Chromium Company, Inc

Date

Certification that the SWPPP Meets Permit Criteria

"I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan prepared for the site or facility known as National Chromium Company, Inc. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the Stormwater Pollution Prevention Plan meets the criteria set forth in the General Permit for the Discharge of Stormwater Associated with Industrial Activity.

I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the Regs. Conn. State Agencies, pursuant to section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute."

25697

3/2/2026

Sudip Bafna, PE, CHMM
Senior Vice President
Fuss & O'Neill, Inc.

Number and Seal

Date

STATE OF CONNECTICUT
SUDIP BAFNA
No. 25697
LICENSED
PROFESSIONAL ENGINEER

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National Chromium Company, Inc.
10 Senexet Road, Putnam, Connecticut
Non-Stormwater Discharge Certification

"I certify that in my professional judgment, the stormwater discharge from the site or facility known as National Chromium Company, Inc. consists only of stormwater, or of stormwater combined with non-stormwater authorized by an effective permit issued under section 22a-430 or section 22a-430b of the Regs. Conn. State Agencies, including the provisions of Section 4.3.2.9b the General Permit for the Discharge of Stormwater Associated with Industrial Activity or of stormwater combined with any of the following discharges, provided they do not contribute to a violation of water quality standards. This certification is based on testing and/or evaluation of the stormwater discharge from the site.

- *Discharges from emergency/unplanned fire-fighting activities.*
- *Landscape irrigation or lawn watering.*
- *Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids.*
- *Uncontaminated ground water or spring water.*
- *Uncontaminated ground water from foundation or footing drains.*
- *Water sprayed for dust control, in accordance with the conditions of this general permit.*
- *for Sector A only, discharges from the spray down of lumber and wood product storage yards where no chemical additives are used in the spray-down waters and no chemicals are applied to the wood during storage.*
- *All other non-stormwater discharges except those specifically listed in this general permit are not authorized by this permit. Such discharges to surface water must be authorized under a different permit issued by the Commissioner pursuant to Section 22a-430 or 22a-430b of the Conn. Gen. Stat.*

I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation, and the on-site drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist unless such floor drain connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to a sanitary sewer.

I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate, and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the Regs. Conn. State Agencies, pursuant to section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute."

Sudip Bafna, PE, CHMM Senior Vice President Fuss & O'Neill, Inc.	25697 Number and Seal	3/2/2026 Date

Appendix C

Records of Spills and Leaks

FUSS & O'NEILL

History of Spills and Leaks
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Date	Time	Location	Description				Response Procedures and Preventive Measures Taken
			Type of Material	Quantity	Source	Reason	

Notes:

(1) This table must identify and document any spill or leak of five (5) gallons or more of petroleum products or any quantity of toxic or hazardous substances (as listed in RCSA Section 22a-430-4 (Appendix B Tables II, III and V, and Appendix D) and 40 CFR 116.4 that could affect stormwater.

(2) This summary must include spills and leaks that occurred three (3) years prior to the SWPPP certification date.

(3) Spill records and information will be contained in Appendix C of the SWPPP and/or in facility files.

Appendix D

Reporting Quantities Flow Chart and DEEP Spill Notification Form

Appendix E

Employee Training Program

Employee Training Guidance Document
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Training will be provided for those employees who work in areas where industrial material or activities are exposed to stormwater, who are responsible for implementing activities required to comply with the General Permit, or whose activities may otherwise affect stormwater quality. Training must be provided within ninety (90) days of hire and at least once a year thereafter. Training will be conducted or supervised by a member of the Stormwater Pollution Prevention Team or other qualified personnel and will consist of a review of this guidance document or an equivalent method of training. This document will be updated as necessary to reflect changes at the facility. Upon receipt and review of the document, trained employees will sign a sheet signifying that they have read the document and understand the objectives of the program. Each signature sheet will be maintained with the SWPPP or in facility files. After training, the appropriate personnel will be familiar with the components and goals of the site's control measures and SWPPP and understand their specific responsibilities with respect to the requirements of the *NPDES General Permit for the Discharge of Stormwater Associated with Industrial Activities*.

1. Overview of the SWPPP

The objective of the SWPPP is to reduce the quantity of pollutants discharged from the facility to the maximum extent possible. It is the responsibility of all employees to perform their jobs in such a manner to limit potential impact to stormwater runoff from onsite activities and operations. The following practices will be implanted at the facility.

2. Good Housekeeping

Employees at the facility involved with activities resulting in contact with stormwater will exercise good housekeeping procedures to reduce the potential for stormwater pollution and reduce or eliminate contact of materials with stormwater. At a minimum, employees will be aware and perform the following tasks:

- Sweep, vacuum, or wash down paved surfaces regularly. Collect and properly dispose of wash water generated.
- Store materials in proper containers, maintain materials covered and provide secondary containment (as appropriate).
- Maintain the facility free of trash and debris to prevent pollutants from being discharged with stormwater runoff
- Maintain dumpsters, trash compactors, and roll-offs in good, watertight condition, with covers closed when not in use.
- Inspect loading dock drains routinely and clean when drain 50% full of debris. Eliminate floor drains connected to the stormwater drainage system.
- Inspect roof for dust/particulates from vents/exhaust, clean and remove residual material as needed to prevent stormwater contamination.
- Clean/remove incidental spills promptly using dry absorbents. For large uncontrolled releases, a spill contractor will be immediately notified.
- Inspect raw steel handling storage areas. Discard all metals appropriately.

- Inspect the loading dock and dispose of any of paint and painting equipment that is exposed to stormwater.
- Inspect metal fabricating areas and maintain clean, dry, orderly conditions in the area.

3. Preventative Maintenance

National Chromium will perform preventative maintenance of all stormwater control measures and equipment to minimize/prevent the discharge of pollutants in stormwater runoff, including:

- Ensure that industrial equipment and systems are kept in proper operating condition.
- Inspect and maintain stormwater management devices routinely to ensure they function properly.
- Perform visual inspection, maintenance, and/or testing of on-site equipment and systems to identify conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.
- Maintain non-structural control measures (e.g., spill response supplies, personnel training).
- Clean catch basins when debris reaches half of the sump depth, keep debris at least 6" below the lowest outlet pipe.
- Conduct routine maintenance of stormwater control measures to ensure continued effectiveness.
- Take immediate corrective action if a stormwater control measure fails, following the procedures outlined in *Section 8* of the SWPPP.

4. Material Management

Proper handling and storage of materials will assist in minimizing potential risk of pollutants impacting stormwater runoff from the site. National Chromium will implement the following material management practice.

- Clearly label all chemicals and waste with their contents and hazards. These materials will be stored in designated areas and provided with secondary containment (as appropriate).
- To the extent possible, storage of materials outside will be minimized. If materials need to be stored outdoors, such materials will be covered (if possible) to minimize exposure to precipitation.
- Ensure drums and containers are properly sealed during transport and storage.
- Outdoor washing or rinsing of vehicles, equipment, or the building is not permitted.
- Manufacturing, processing, and production activities will be conducted indoors.
- Municipal waste and regulated waste (e.g., hazardous waste, non-hazardous (CT Regulated Waste), used oil) will be disposed of in accordance with State and Federal regulations.
- Routinely inspect and maintain spill response materials and equipment so they remain ready to use.
- Providing training for personnel engaged in inspection and acceptance of inbound materials to ensure proper handling and rejection of non-compliant items.

- Segregate incompatible materials (e.g., acids, bases, oxidizers) to reduce risk during storage.
- Maintain storage areas for raw metal so that there is easy access to a spill kit in the event of a spill and labeling stored materials to aid in identifying spill contents.

5. Inspections, Assessments, and Corrective Actions

National Chromium will perform inspections and assessments required by the General Permit to verify compliance, identify potential issues, and ensure stormwater control measures remain effective. Inspections serve as an early warning system for conditions that could cause pollutants to impact stormwater runoff so corrective actions can be implemented promptly.

National Chromium will complete the following types of inspections and assessments:

- Monthly routine site inspection to identify potential problems and confirm good housekeeping practices are being followed.
- Perform quarterly visual stormwater assessments and monitoring to evaluate stormwater quality and identify evidence of potential pollution in the discharge.
- Complete semi-annual comprehensive site inspections to confirm overall compliance with the General Permit requirements, effectiveness of stormwater control measures, and evaluate all areas of the facility exposed to stormwater.
- All inspections, monitoring, and assessments will be documented using forms provided in *Appendix F* and maintained with the SWPPP for a minimum of five (5) years.

When deficiencies are identified during inspections, assessments, or stormwater monitoring National Chromium will take corrective action(s) as required by the General Permit, this may include:

- Repairing, modifying, or replacing stormwater control measures.
- Implementing temporary stormwater control measures until permanent repairs are completed.
- Promptly containing, cleaning, and addressing spill, leak, or unauthorized release and implementing measures to prevent recurrence.
- Correcting any stormwater control measure that was not installed as required, was improperly installed, or not being properly maintained (repairs must be completed within 14 days of discovery unless longer timeframe is approved).
- Documenting all corrective actions related to stormwater control measures and maintaining records with the SWPPP for a minimum of five (5) years.

Failure to complete corrective actions in a timely manner following inspections, assessments, monitoring, or review of stormwater control measures is considered a permit violation.

Employee Training Guidance Document
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

6. Spill Prevention and Response and Procedures

National Chromium will employ spill prevention and response measures, as follows:

- Containers with the potential to spill will be labeled appropriately, maintained in good condition, and provided with secondary containment (as required).
- Facility personnel will respond only to incidental spills involving materials that employees regularly handle. An outside contractor will be called to respond to uncontrolled releases.
- Monthly visual inspections of areas that have a potential exposure or could impact stormwater will be performed to identify potential indicators of stormwater pollution.
- Facility personnel will be notified promptly whenever a spill, leak, or unauthorized release occurs, this includes members of the stormwater Pollution Prevention Team, and if necessary, emergency spill response contractors and agencies (i.e., police, fire, hospitals, etc.) will also be notified.
- Any leak, spill, or unauthorized discharge to the stormwater system containing a hazardous substance or oil in an amount equal to or more than reportable quantities will be reported to DEEP once they are identified.
- Facility personnel will control and clean up spills of solvents and other liquid cleaners, control sand buildup and disbursement from sandblasting operations, and prevent exposure of recyclable wastes. Substitute environmentally benign cleaners will be used when possible.

7. Emergency Equipment Locations

- Spill containment materials are kept at strategic locations throughout the site. Spill containment materials will be readily available and utilized to divert spills away from unpaved surfaces and/or storm drains.
- There are four locations where spill response materials are stored onsite, this includes (1) in the loading dock area, one (1) near the 2,000-gallon AST, one (1) near the flammable cabinet, and one (1) near the chrome plating area.

8. Emergency Procedures

In the event of a spill, leak, release, or other emergency that may impact stormwater, National Chromium has established emergency procedures to protect human health and the environment. These procedures include but are not limited to the following:

- Immediately report any spill, leak, or unauthorized discharge to a member of the pollution prevention team or supervisor.
- Determine the source of the release, stop people and vehicle traffic from entering the area where spill is occurring.
- Put on appropriate PPE prior to implementing spill response. Attempt without risk of injury to stop and/or contain the spill or release (e.g., adjusting container, closing valve, etc.).
- Use onsite spill response equipment to contain and absorb the release and properly dispose of contaminated materials in accordance with State and Federal regulations.

- If applicable, notify appropriate emergency regulatory authorities in accordance with the spill reporting requirements outlined in Section 4.7.3 of this Plan.
- If needed, contact an Emergency Response Contractor to assist with spill response activities.
- Document the incident, response actions, and corrective actions taken.
- Review the cause of the incident and implement measures to prevent recurrence (e.g., training, equipment repair, improved storage/handling practices).
- Review potential climate related impacts (e.g., more frequent or intense storms, flooding, prolonged heavy rainfall, or extreme heat) that could affect stormwater controls or emergency procedures.

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Training Sign-In Sheet
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

I have received a copy of the National Chromium Company, Inc. " Stormwater Pollution Prevention Plan - Employee Training Outline." I have read and understand the information and objectives of this document.

Name (Printed)	Name (Signature)	Job Title or Department

Date of Training: _____

Training Presented by: _____ _____
(Printed Name) (Signature)

Appendix F

Inspection Forms and Records

Monthly Routine Inspection Form
Stormwater Pollution Prevention Plan

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National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Instructions: National Chromium is required to complete monthly routine inspections of the site in accordance with the General Permit for the Discharge of Stormwater Associated with Industrial Activities. During each inspection, the inspector must document any evidence of actual or potential stormwater pollution, including leaks, spills, staining, erosion, or deficiencies with stormwater control measures. If any issues are identified, they must be described in detail, and all corrective actions or modifications to stormwater control measures must be noted. Records of corrective actions must be maintained with the SWPPP or facility files for a minimum of five (5) years. Inspections must be performed by qualified and trained personnel who are familiar with site operations and permit requirements.

Inspector Name &Title: _____ **Date/Time:** _____

Signature: _____ **Weather Conditions:** _____

Inspector Role: ☐ Member of Pollution Prevention Team
☐ Other Qualified Personnel

Stormwater Discharge Occurring? Yes ☐ No ☐

Area	Items to Inspect	Yes or No	Observations, Recommendations, and/or Required Corrective Actions
General Site Conditions	Evidence of stormwater pollution (e.g., debris, staining, spill/leak) present?		
	Non-stormwater discharge observed (e.g., wash water, process water, or other unauthorized discharges)?		
	Evidence of soil erosion observed?		
	Poor housekeeping practices or issues with existing stormwater control measures?		
Outdoor Material Storage Areas (e.g., #2 fuel oil AST, pallet storage area, transformers)	Evidence of stormwater pollution present (e.g., debris, staining, spill/leak)?		
	Containers, drums, totes not sealed, lids open, damaged, missing labels?		
	Empty drums, totes, or AST shows signs of corrosion or damage?		
	Residue, staining, or litter present in the pallet storage area?		

Monthly Routine Inspection Form
Stormwater Pollution Prevention Plan

FUSS & O'NEILL

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Area	Items to Inspect	Yes or No	Observations, Recommendations, and/or Required Corrective Actions
Material Loading/Unloading Areas (e.g., Loading/Unloading Docks)	Evidence of stormwater pollution present (e.g., debris, staining, spill/leak)?		
	Debris, sediment, or other potential pollutant sources observed near loading docks, trench drains, material transfer areas		
Dumpsters (e.g., trash, recyclables)	Trash dumpsters corroded, or in poor condition?		
	Lids/cover left open when not in use or missing, drain plugs missing, or not watertight?		
	Loose material or waste outside designated containers?		
Exterior of Building (Exhaust Ventilation, roof drains)	Roof drains, gutters, or leaders clogged or damaged?		
	Dust/grit accumulation present requiring removal/clean up?		
	Staining or particulate build-up present near exhaust vents or HVAC units?		
Paved Parking Lots	Excessive sand/sediment present or sediment being tracked offsite at entry/exit points?		
	Evidence of stormwater pollution present (e.g., debris, staining, spill/leak)?		

Monthly Routine Inspection Form
Stormwater Pollution Prevention Plan

FUSS & O'NEILL

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Area	Items to Inspect	Yes or No	Observations, Recommendations, and/or Required Corrective Actions
Stormwater Drainage Structures (Catch Basins/Outfalls)	Evidence of stormwater pollution present (e.g., debris, staining, spill/leak)?		
	Excessive sediment/debris accumulating within onsite catch basins?		
	Erosion or scour noted at the outfalls/stormwater discharge points?		
Spill Response Equipment	Emergency equipment (e.g., spills kits, absorbents, PPE, booms, first aid kits, brooms/shovels, or buckets/drums) missing damaged or inaccessible?		

Based on the inspection, do existing stormwater control measures appear adequate: YES / NO (circle one). If NO, identify improvements, repairs, or replacements needed. All modifications to stormwater control must be documented within the SWPPP and/or facility files.

Notes/Other Observations:

Semi-Annual Comprehensive Inspection Form
Stormwater Pollution Prevention Plan

FUSS & O'NEILL

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Instructions: National Chromium is required to perform semi-annual comprehensive inspections of the facility in accordance with the requirements of the General Permit for the Discharge of Stormwater Associated with Industrial Activities. This inspection must be conducted by a member of the Stormwater Pollution Prevention Team or other qualified individuals familiar with the facility's operation and stormwater control measures. All sections of this form must be completed and any deficiencies or required corrective actions identified must be corrected, and the corrective actions must be documented in the SWPPP. Completed inspection forms and supporting documentation must be retained in *Appendix F* of the SWPPP. As part of the semi-annual comprehensive inspection, a Monthly Routine Inspection form will also be completed to supplement this comprehensive inspection.

Review information and documentation on the following before completing this inspection form:

- Site Drainage Areas
- Buildings, structures, and impervious areas
- Stormwater control measures (structural and non-structural)
- Stormwater management system (conveyances, outfalls, infiltration BMPs)
- Potential pollution sources (outdoor storage, handling, industrial activity areas)
- Spill prevention and response measures (spill kits, absorbents, dry cleanup materials)
- Resilience measures
- Recordkeeping and Documentation
  - Monthly routine inspection forms (past 6 months)
  - Quarterly visual assessment reports (past 6 months)
  - Discharge monitoring reports (past 6 months)
  - Employee stormwater training (within the last year)

Inspector Name/Title: _____ **Date/Time:** _____

Signature: _____ **Weather Conditions:** _____

Inspector Role: ☐ Member of Pollution Prevention
☐ Other Qualified Personnel

Stormwater Discharge Occurring: Yes ☐ No ☐

Inspection Item	Corrective Action Needed (Yes, No, or Not Applicable)	Observations/Comments
Drainage Areas		
Were there any changes in site drainage within the last six (6) months that could affect stormwater? Does the Site Map require updating to reflect current conditions?		
Buildings, Structures, and Impervious Areas		
Was evidence of spills, leaks, staining, or other potential pollution sources observed on buildings, structures, or other impervious surfaces?		
Structural Control Measures		
Were any issues identified with stormwater treatment systems (e.g., catch basins). or were they found not functioning properly or lacking preventive maintenance per best engineering practices?		

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National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Inspection Item	Corrective Action Needed (Yes, No, or Not Applicable)	Observations/Comments
Were any cracks, leaks, signs of deterioration, or other issues affecting the integrity of secondary containment system for outdoor tanks or containers holding chemicals or wastewater observed?		
Non-Structural Control Measures		
Were any housekeeping deficiencies or issues with non-structural control measures (e.g., poor material handling, uncovered containers, excessive outdoor storage) observed?		
Were any signs of discoloration, staining, or particulate build up observed on roof surfaces or near process vents?		
Was evidence of leaks, spills, or other signs of stormwater pollution observed in loading, unloading, or material transfer areas?		
Stormwater Management System		
Were any stormwater conveyance system (e.g., swales, gutters, channels, etc.) observed to be deteriorated, clogged, leaking, or otherwise not functioning properly?		
Were any signs of erosion, debris accumulation, or spills observed at the stormwater discharge point/outfalls?		
Were any issues observed with infiltration practices indicating that they may not be functioning properly or could cause groundwater contamination?		
Industrial Materials or Activity Exposure		
Were there any changes to the outside areas, activities, or material storage observed in the last six (6) months that could affect stormwater?		
Were any new potential pollutant sources identified that should be added to the SWPPP?		
Resilience Measures		
Do resiliency or mitigation measures designed to minimize impacts from storm events, hurricanes, or extreme precipitation events require updating or revision?		

Semi-Annual Comprehensive Inspection Form
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Inspection Item	Corrective Action Needed (Yes, No, or Not Applicable)	Observations/Comments
Spill Prevention and Response		
Was any emergency spill response equipment (e.g., spills kits, absorbents, PPE, booms, first aid kits, or cleanup tools) found missing damaged or inaccessible?		
SWPPP and Documentation Review		
Do the names and phone numbers of Stormwater Pollution Prevention Team listed in the SWPPP require updating?		
Were all required monthly routine inspections completed in the past six (6) months and were any corrective actions for noted deficiencies completed and documented? Are new or modifications to existing stormwater control measures required to prevent recurrence of previously identified deficiencies?		
Were all required semi-annual comprehensive inspections completed in the past six (6) months and were any corrective actions for noted deficiencies completed and documented? Are new or modifications to existing stormwater control measures required to prevent recurrence of previously identified deficiencies?		
Were all quarterly visual stormwater assessments required during the past two (2) quarters and were any corrective actions for noted deficiencies completed and documented? Are new or modifications to existing stormwater control measures required to prevent recurrence of previously identified deficiencies?		
Were semi-annual stormwater samples collected during the most recent monitoring period and were benchmark exceedances identified. If so, were corrective actions completed and documented? Are new or modifications to existing stormwater control measures required to prevent recurrence of previously identified deficiencies?		
Has annual stormwater training been completed for all Stormwater Pollution Prevention Team members and relevant personnel within the past year?		

Semi-Annual Comprehensive Inspection Form
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Instructions: If corrective action is required, the issue must be corrected and documented on this table, then filed in *Appendix F* of the SWPPP.

Inspection Date	Inspection Area	Description of Deficiency or Concern	Description of Corrective Action Take (if applicable)	Follow-up Required (Yes/No)	Completion Date

Appendix G

Discharge Monitoring Reports and Associated Records

Appendix H

Visual Stormwater Assessments & Benchmark Monitoring Procedures and Forms

Quarterly Visual Stormwater Assessment &
Benchmark Monitoring Procedures
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

PURPOSE

This procedure describes the method for conducting quarterly visual stormwater assessments and benchmark monitoring of stormwater discharges at the facility in accordance with the CT DEEP's *NPDES General Permit for the Discharge of Stormwater Associated with Industrial Activity*. The stormwater assessments and monitoring are intended to verify the effectiveness of stormwater control measures, identify potential sources of pollution, and confirm compliance with the permit requirements.

FREQUENCY OF VISUAL ASSESMENT AND BENCHMARK MONITORING

Visual assessments must be conducted once each quarter during the following periods:

1. January 1 – March 31
2. April 1 – June 30
3. July 1 – September 30
4. October 1 – December 31

Benchmark monitoring must be conducted semi-annually during the following periods:

1. January 1 – June 30
2. July 1 – December 31

Semi-annual monitoring events must be separated by at least 30 days.

QUALIFYING STORM EVENTS

- Samples must be collected from discharges resulting from a storm event that occurs at least seventy-two (72) hours after any previous storm generating a discharge.
- Samples must be collected within the first thirty (30) minutes after the discharge begins.
- If it is not possible to collect a sample within the first thirty (30) minutes, documentation must be maintained within the SWPPP indicating the reason and the actual time of sample collection.

SAMPLE LOCATIONS

Samples will be collected at the outfall or nearest feasible location representative of the discharge. This includes the following outfall locations:

- Outfall 1 – Located southeast of the building on the rip rap embankment. Samples will be collected from the plastic pipe prior to discharge to the woody area on the property.

The samples must be collected and transported to a well-lit area for visual assessment and/or prepared for laboratory analysis. The visual assessment should be completed as soon as possible after collecting the sample.

Quarterly Visual Stormwater Assessment &
Benchmark Monitoring Procedures
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

REQUIRED EQUIPMENT

- Clean, clear glass or plastic container with lid (for visual assessments)
- Containers (pre-preserved as needed) provided by the laboratory (for benchmark monitoring)
- Telescopic pole or sampling scoop, as needed
- Nitrile gloves
- pH meter
- Cooler with ice or ice packs (to maintain samples at 4-6°C)
- Headlamp if sampling at night or low-light conditions

SAMPLING PROCEDURE

1. Stormwater Grab Sample Collection
    - Initiate and complete grab sample collection from the designated outfall(s) within 30 minutes of discharge beginning.
    - Collect stormwater directly from the discharge point, avoid contact with surrounding surfaces.
    - Completely fill sample containers. Do not overfill laboratory provided, pre-preserved bottles.
2. Visual Assessment (Quarterly)
    - Collect samples of stormwater in a clean, clear glass or plastic container
    - Evaluate the sample in a well-lit location for color, odor, clarity (diminished), floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of pollution.
    - Record results in the Quarterly Visual Assessment Form provided in *Appendix H*.
3. Sample Handling (Benchmark Monitoring)
    - Label each container with site location, outfall number, parameter, date, and time.
    - Place containers immediately in a cooler with ice or ice packs to maintain samples at 4-6°C.
    - Complete a Chain of Custody form
    - Complete the Benchmark Monitoring Report Form provided in *Appendix H.*
4. Sample Transport and Analysis
    - If collected during work hours, deliver samples directly to the laboratory, or if possible, coordinate with the laboratory to have a courier pick-up the samples.
    - If immediate delivery or sample pick-up is not possible, store it in a cooler with ice or ice packs or in a refrigerator until samples can be brought to the laboratory for analysis.
    - Refer to *Table 5* for the applicable stormwater parameters holding times to ensure analyzed within the required timeframe.

Quarterly Visual Stormwater Assessment &
Benchmark Monitoring Procedures
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

PARAMETERS FOR LABORATORY ANALYSIS (BENCHMARK MONITORING)

Samples must be analyzed by a Connecticut certified laboratory using the EPA methods specified in 40 CFR Part 136 for the following parameters:

- pH (field measurement, record result)
- Total Oil & Grease (O&G)
- Chemical Oxygen Demand (COD)
- Total Kjeldahl Nitrogen (TKN)
- Total Phosphorus (TP)
- Total Suspended Solids (TSS)
- Nitrate as Nitrogen (NO_3)
- Total Copper (Cu)
- Total Lead (Pb)
- Total Zinc (Zn)
- Aquatic Toxicity (LC50 – once during first year of permit coverage)
- E-Coli (collected annually, unless notified by CT DEEP)

DOCUMENTATION

- The quarterly visual assessment should be documented using the form provided in *Appendix H* and retained within the SWPPP.
- DMRs must completed using paper forms and submitted by email to DEEP.StormwaterIndustrial@ct.gov until the Notice of Coverage is received by DEEP and a letter is provided with instructions on how to transition to EPA's online reporting system (i.e., NetDMR).
- Once the facility has transitioned to NetDMR benchmark monitoring results must be input into EPAs NetDMR system and submitted electronically to DEEP and EPA.
- Copies of completed Discharge Monitoring Reports, field data sheets, and laboratory reports must be maintained for five (5) years in *Appendix G*. Records past the retention period can be archived and maintained electronically.

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Quarterly Visual Stormwater Assessment Form

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Year: _____ Quarter (circle one):

Q1: 1/1 to 3/31 Q2: 4/1 to 6/30 Q3: 7/1 to 9/30 Q4: 10/1 to 12/31

Date: _____ Time Discharge Began: _____ Date of Last Rainfall: _____

Time Sampling Began: _____

Sampler Name: _____ Snow or ice on ground surface at site? (Yes/No) _____

	Observed Conditions
	OUTFALL #: __1_____
Color	
Odor	
Clarity (diminished)	
Floating Solids	
Settled Solids	
Suspended Solids	
Foam	
Oil Sheen	
Other Obvious Indicators of Pollution	

Assessment (Attach additional sheets if necessary):

Based on the conditions observed, is there the potential that the facility's current control measures are inadequate or require maintenance?

_____

_____

Follow-up actions taken:

_____

_____

RETAIN THIS FORM WITH THE PLAN OR FACILITY FILES FOR THE PERMIT TERM

FUSS & O'NEILL

Benchmark Monitoring Form
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Discharge Location: _____

Date Sample Collected: _____

Time Sample Collected: _____

Time Discharge Began: _____

Duration Since Prior Storm Event: _____

Quantity of Rainfall: _____

Sample pH: _____

Semi-Annual Parameters Collected? Yes ☐ No ☐

Impaired Waters Parameters Collected? Yes ☐ No ☐ N/A ☐

Toxicity Samples Collected? Yes ☐ No ☐ N/A ☐

Snow or Ice Present? Yes ☐ No ☐

Name of person(s) collecting samples: _____

Laboratory: _____

The results of the stormwater discharge sampling, including date and time of analyses, were initiated and the analytical methods used are provided in the attached laboratory report.

Notes:

_____

_____

_____

_____

_____

_____

Appendix I

Non-Compliance Notifications and Corrective Action Documentation

Appendix J

SWPPP Amendment Log

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SWPPP Amendments Log
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Section Number	Date of Revision	Description of Amendment

Appendix K

Copy of General Permit Registration, Authorization Letter, and Associated Documentation

Appendix L

Implementation Plan

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Implementation Plan
Stormwater Pollution Prevention Plan

National Chromium Company, Inc.
10 Senexet Road
Putnam, Connecticut

Items to Be Implemented	Scheduled Completion Date	Person Responsible for Action	Signature and Date or Alternative Action Taken