

MOVE YOUR ENVIRONMENT FORWARD

STORMWATER POLLUTION PREVENTION PLAN

HAR-CONN CHROME COMPANY

603 New Park Avenue
West Hartford, CT 06110

Prepared For:

Har-Conn Chrome Company
603 New Park Avenue
West Hartford, CT 06110

Prepared By:

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HRP# HAR1117.WM

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STORMWATER POLLUTION PREVENTION PLAN UPDATES

In accordance with Section 4.3.5, *Keeping the SWPPP Current* of the Connecticut Department of Energy and Environmental Protection's (CT DEEP) National Pollutant Discharge Elimination System (NPDES) *General Permit for the Discharge of Stormwater Associated with Industrial Activities* (IGP; also referred to as "General Permit"), Har-Conn Chrome Company (Har-Conn) shall amend the Stormwater Pollution Prevention Plan (SWPPP; also referred to as the "Plan") whenever:

- A. there is a change at the site which has an effect on the potential to cause pollution of the surface waters of the state;
- B. the actions required by the Plan fail to ensure or adequately protect against pollution of the surface waters of the state;
- C. the Commissioner requests modification of the Plan;
- D. Har-Conn 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 Federal Clean Water Act (CWA) and as identified in the most recent State of Connecticut Integrated Water Quality Report (CTIWQR);
- E. Har-Conn is notified that a Total Maximum Daily Load (TMDL) to which they are subject to has been established for the stormwater receiving water;
- F. it is necessary to address any significant sources or potential sources of pollution identified as a result of any inspection or visual monitoring;
- G. it is required as a result of monitoring benchmarks or effluent limitations in "Monitoring" (Section 4.5 of the IGP); and/or
- H. required corrective actions are being implemented (Section 4.6 of the IGP and **Appendix G**).

The SWPPP shall be amended and all actions required by the Plan shall be completed within 120 days (or within another interval as specified in the General Permit or as may be approved in writing by the Commissioner) of the date Har-Conn becomes aware or should have become aware that any of the conditions listed above have occurred.

If significant changes are made to the site or to the Plan in accordance with A through H above, the Plan shall be recertified in accordance with the "Certification of Non-Stormwater Discharges" (Section 4.3.2.9b) and "SWPPP Certification" (Section 4.3.2.9) sections of the General Permit, by a Qualified Professional as defined in Section 7.0 of the Permit.

SWPPP Amendments are noted in **Table 1**.

Table 1 SWPPP Amendments				
Review Date	Recertification Required (Yes/No)	Description of Revision	Sections Amended	Date of Amendment

1.0 INTRODUCTION

1.1 Purpose and Limitations

This Stormwater Pollution Prevention Plan (SWPPP; also referred to as the "Plan") has been developed for Har-Conn Chrome Company (Har-Conn), located at 603 New Park Avenue, West Hartford, Connecticut (**Figure 1**) pursuant to the Connecticut Department of Energy and Environmental Protection (CT DEEP) National Pollutant Discharge Elimination System (NPDES) *General Permit for the Discharge of Stormwater Associated with Industrial Activities* (IGP; also referred to as the "General Permit"). A copy of the General Permit is included in **Appendix A**. Har-Conn is covered by the General Permit by virtue of stormwater discharging from the site via point sources and sheet flow. All Requirements for Authorization listed under Section 2.1 of the General Permit are met by the facility.

The General Permit program is largely self-administered. Har-Conn will register with CT DEEP and maintain documentation in **Appendix B** of the Notice of Intent registration. CT DEEP will issue a Copy Notice of Coverage Letter to Har-Conn. The letter correspondence from CT DEEP is anticipated to take 90 to 180 days to receive but may result in larger lead times due to the influx of permit applications within the first two years of the IGP. The Notice of Coverage Letter will be maintained in **Appendix B** of the SWPPP with the Notice of Intent. The primary conditions of permit coverage are listed below:

- Registration with CT DEEP for permit coverage (Upon Receipt of Coverage Authorization as copy of the permit coverage will be included in **Appendix B**)
- Development and maintenance of a SWPPP
- Implementation of SWPPP recommendations
- Monitoring and analysis
- Corrective actions
- Employee training
- Site inspections

Per Section 4.3.1.3 the SWPPP is a living document and is intended to be a record of the implementation (including inspection, maintenance, monitoring, and corrective action) of the permit requirements. Therefore, facilities must keep their SWPPP up to date throughout their permit coverage and update the SWPPP with information including, but not limited to, revisions and improvements to their stormwater management program, corrective actions following spills, benchmark exceedances, or effluent limit violations, as well as new information and experiences with major storm events as they occur. Har-Conn must maintain compliance with the SWPPP at all times.

Laurel Pickard, P.E., Senior Project Engineer of HRP Associates, Inc. (HRP), inspected the site on October 22, 2025, to prepare this SWPPP per requirements consistent with the NPDES IGP, October 1, 2025.

References to the "facility" or "site" within this report refers to Har-Conn's industrial activity. These definitions and this SWPPP do not include outdoor exposures, activity or property owned by others.

1.2 Consistence with Other Plans and Permits

This plan is not intended to be nor to take the place of a Spill Prevention, Control, and Countermeasure (SPCC) Plan for oil storage and handling prepared pursuant to the Code of Federal Regulations (CFR), 40 CFR 112, a Contingency Plan for hazardous waste management prepared pursuant to 40 CFR 265 Subpart D, an industrial wastewater discharge permit or an Emergency Action Plan (EAP) under the Occupational Safety and Health Administration (OSHA).

1.3 Special Requirements

The General Permit contains special requirements for certain facilities, depending on the type of industrial activity at the facility and the specific location of the stormwater discharges. The following paragraphs explain the applicability of these requirements.

1.3.1 Industrial Activity Sector

Thirty-four specific industrial sectors, listed in **Table 2**, are required to meet permit provisions above and beyond the General Permit requirements.

Table 2 Industrial Sectors		
Sector	Name	SIC Codes
A	Timber Products	2411, 2421, 2426, 2429, 2431, 2435, 2436, 2439, 2441, 2448, 2451, 2452, 2491, 2493, 2499, 2611, 2621, 2631 or 5099
B	Paper and Allied Products Manufacturing	2652, 2653, 2655, 2656, 2657, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679
C	Chemical and Allied Products Manufacturing	2812, 2813, 2816, 2819, 2821, 2822, 2823, 2824, 2833, 2834, 2835, 2836, 2841, 2842, 2843, 2844, 2851, 2861, 2865, 2865, 2869, 2873, 2874, 2875, 2879, 2891, 2892, 2893, 2895, 2899, 2911, 3952
D	Asphalt Paving and Roofing Materials Manufacturers and Lubricant Manufacturers	2951, 2952, 2992, 2999
E	Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing	3211, 3221, 3229, 3231, 3241, 3251, 3253, 3255, 3259, 3261, 3262, 3263, 3264, 3269, 3271, 3272, 3273, 3274, 3275, 3281, 3291, 3292, 3295, 3296, 3297, 3299
F	SIC Codes and Description	3312, 3313, 3315, 3316, 3317, 3321, 3322, 3324, 3325, 3331, 3334, 3339, 3341, 3353, 3354, 3355, 3356, 3357, 3363, 3364, 3365, 3366, 3369, 3398, 3399
J	Mineral Mining and Dressing	1411, 1422, 1423, 1429, 1442, 1446, 1455, 1459, 1474, 1475, 1479, 1481, 1499

Table 2 Industrial Sectors		
Sector	Name	SIC Codes
K	Hazardous Waste Treatment, Storage or Disposal Facilities	HZ
L	Landfills and Land Application Sites	LF
M	Automobile Salvage Yards	5015
N	Scrap Recycling Facilities	5093
O	Steam Electric Generating Facilities	SE
P	Land Transportation	4011, 4013, 4111, 4119, 4121, 4131, 4141, 4142, 4151, 4173, 4212, 4213, 4214, 4215, 4221, 4222, 4225, 4231, 5171, 5541
Q	Water Transportation	4412, 4424, 4432, 4449, 4481, 4482, 4489, 4491, 4492, 4493, 4499, 5551, 7997
R	Ship and Boat Building and Repair Yard	3731, 3732
S	Air Transportation Facilities	4512, 4513, 4522, 4581
T	Treatment Works	TW
U	Food and Kindred Products	2011, 2013, 2015, 2021, 2022, 2023, 2024, 2026, 2032, 2033, 2034, 2035, 2037, 2038, 2041, 2043, 2044, 2045, 2046, 2047, 2048, 2051, 2052, 2053, 2061, 2062, 2063, 2064, 2066, 2067, 2068, 2074, 2075, 2076, 2077, 2079, 2082, 2083, 2084, 2085, 2086, 2087, 2091, 2092, 2095, 2096, 2097, 2098, 2099, 2111, 2121, 2131, 2141
V	Textile Mills, Apparel, and Other Fabric Product Manufacturing	2211, 2221, 2231, 2241, 2251, 2252, 2253, 2254, 2257, 2258, 2259, 2261, 2262, 2269, 2273, 2281, 2282, 2284, 2295, 2296, 2297, 2298, 2299, 2311, 2321, 2322, 2323, 2325, 2326, 2329, 2331, 2335, 2337, 2339, 2341, 2342, 2353, 2361, 2369, 2371, 2381, 2384, 2385, 2386, 2387, 2389, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2399, 3131, 3142, 3143, 3144, 3149, 3151, 3172, 3199
W	Furniture and Fixture	2434, 2511, 2512, 2514, 2515, 2517, 2519, 2521, 2522, 2531, 2541, 2542, 2591, 2599
X	Printing and Publishing	2711, 2721, 2731, 2732, 2741, 2752, 2754, 2759, 2761, 2771, 2782, 2789, 2791, 2796
Y	Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries	3011, 3021, 3052, 3061, 3069, 3081, 3082, 3083, 3084, 3085, 3086, 3087, 3088, 3089, 3931, 3942, 3944, 3949, 3951, 3953, 3955, 3961, 3965, 3991, 3993, 3995, 3996, 3999

Table 2 Industrial Sectors		
Sector	Name	SIC Codes
AA	Fabricated Metal Products	3411, 3412, 3421, 3423, 3425, 3429, 3431, 3432, 3433, 3441, 3442, 3443, 3444, 3446, 3448, 3449, 3451, 3452, 3462, 3463, 3465, 3466, 3469, 3471, 3479, 3482, 3483, 3484, 3489, 3491, 3492, 3493, 3494, 3495, 3496, 3497, 3498, 3499, 3911, 3914, 3915
AB	Transportation Equipment, Industrial or Commercial Machinery	3511, 3519, 3523, 3524, 3531, 3532, 3533, 3534, 3535, 3536, 3537, 3541, 3542, 3543, 3544, 3545, 3546, 3547, 3548, 3549, 3552, 3553, 3554, 3555, 3556, 3559, 3561, 3562, 3563, 3564, 3565, 3566, 3567, 3568, 3569, 3581, 3582, 3585, 3586, 3589, 3592, 3593, 3594, 3596, 3599, 3711, 3713, 3714, 3715, 3716, 3721, 3724, 3728, 3743, 3751, 3761, 3764, 3769, 3792, 3795, 3799
AC	Electronic, Electrical, Photographic and Optical Goods	3571, 3572, 3575, 3578, 3579, 3612, 3613, 3621, 3624, 3625, 3629, 3631, 3632, 3633, 3634, 3635, 3639, 3641, 3643, 3644, 3645, 3646, 3647, 3648, 3651, 3652, 3661, 3663, 3669, 3671, 3672, 3674, 3675, 3676, 3677, 3678, 3679, 3691, 3692, 3694, 3695, 3699, 3812, 3821, 3822, 3823, 3824, 3825, 3826, 3827, 3829, 3841, 3841, 3841, 3842, 3844, 3845, 3851, 3873
AE	Bulk Solid De-icing Material Storage	4226, 5168
AF	Federal, State, or Municipal Fleet Facilities	4311, 9199, 9621, 9621, 9711
AG	Small-Scale Composting Facilities	AG
AH	Stormwater Discharges Designated by the Commissioner Requiring Permits	AH
<i>SIC = Standard Industrial Classification</i>		

The subject facility, Har-Conn, operates under the SIC code of 3471 and North American Industry Classification System (NAICS) code of 332813, which falls under the above sectors and is subject to additional sector-specific requirements of Sector AA, (Fabricated Metal Products). Based on the SIC code of 3471, Har-Conn is also required to monitor for aluminum. Additional sector specific requirements are accounted for in **Section 3.18** of this Plan.

1.3.2 Discharges to Municipal Separate Storm Sewer

This facility discharges a portion of its stormwater runoff to the City of West Hartford's Municipal Separate Storm Sewer System (MS4). Har-Conn must comply with any additional applicable requirements in the City of West Hartford's MS4 permit, if notified of such conditions. The MS4 system discharges to Trout Brook.

1.3.3 Discharges to Impaired Waters and High-Quality Waters

The CT DEEP has designated certain water bodies in the State as "Impaired Waters" under Section 303(d) and 305(b) of the Clean Water Act (CWA). They are listed in the most recent Connecticut Integrated Water Quality Report (CTIWQR). Additional monitoring requirements apply to facilities that discharge to these waters. Any new discharge to high quality waters shall be discharged in accordance with the Connecticut Anti-Degradation Implementation Policy in the Water Quality Standards.

The facility discharges its stormwater runoff to the City of West Hartford MS4 system, which ultimately discharges to Trout Brook (CT4403-00_01) located approximately 500 feet south of the property. Trout Brook is identified as being impaired for *Escherichia coli* (*E. coli*).

1.3.4 Total Maximum Daily Loads

Specific segments of impaired waters have been allocated Total Maximum Daily Loads (TMDLs) of certain pollutants by CT DEEP. If a facility discharges stormwater to a segment of an impaired water body that has established TMDLs, and the facility receives written notification from CT DEEP, additional monitoring requirements will apply to the facility. These requirements do not apply to Har-Conn at this time.

1.4 Amendments to Plan

The SWPPP will be amended whenever:

- A. there is a change at the site which has an effect on the potential to cause pollution of the surface waters of the state;
- B. the actions required by the Plan fail to ensure or adequately protect against pollution of the surface waters of the state;
- C. the Commissioner requests modification of the Plan;
- D. Har-Conn 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 Federal CWA and as identified in the most recent CTIWQR;
- E. Har-Conn is notified that a TMDL to which they are subject to has been established for the stormwater receiving water;
- F. it is necessary to address any significant sources or potential sources of pollution identified as a result of any inspection or visual monitoring;
- G. it is required as a result of monitoring benchmarks or effluent limitations in "Monitoring" (Section 4.5 of the General Permit); and/or
- H. required corrective actions are being implemented (Section 4.6 of the General Permit and **Appendix G**).

The amended plan should be completed and all actions required by the plan should be completed within 120 days of the date that Har-Conn becomes aware, or should have become aware, that any of the conditions above has occurred. If significant revisions are made to the SWPPP, the General

Permit requires re-certification by a Qualified Professional. These amendments should be recorded in **Table 1 (Page V)** of the SWPPP.

1.5 Pollution Prevention Team

The flow chart below illustrates Har-Conn's Pollution Prevention Team (PPT). The purpose of the PPT is to establish specific individuals who will be responsible for implementation, maintenance, and revision of the SWPPP. The team Coordinator should be the site contact for any inquiries from CT DEEP or other agencies regarding the SWPPP. These individuals are to be considered qualified personnel or qualified person(s).

At least one team member must be present at the facility or on-call during every operating shift. Refer to the Spill Response Procedures Flow Chart (**Figure 3**) for site contact information.

STORMWATER POLLUTION PREVENTION TEAM
Har-Conn Chrome Company, 603 New Park Avenue, West Hartford, Connecticut

Coordinator

Claudia Diakolambrianos
Environmental & Laboratory Manager
860-402-0383

Responsibilities:

- Coordinate Plan development and implementation
- Coordinate training
- Coordinate and oversee Monthly and Semi-Annual Inspections to ensure all control measures are in place
- Oversee daily housekeeping and BMPs
- Oversee stormwater sampling
- Implementing control measures
- Certify and Submit DMRs

Alternate Coordinator

Casey Backus
VP of Operations
860-622-8958

Responsibilities:

- Oversee preventative maintenance procedures
- Coordinate and oversee Monthly and Semi-Annual Inspections to ensure all control measures are in place
- Oversee daily housekeeping and BMPs
- Act as emergency coordinator
- Update Plan as needed
- Conduct/coordinate annual training
- Oversee stormwater sampling
- Help prepare DMRs

Team Members

In addition to primary and alternate coordinator

Valensha Evans

Laboratory Supervisor
860-680-4127

Troy Garvey

Senior Laboratory Technician
860-888-3483

Mike Provost

Waste Treatment Technician
860-250-8504

Eric Kimball

Waste Treatment/Maintenance Technician
860-983-6107

Matthew Logan

Waste Treatment/Lab Technician
860-205-4460

Responsibilities:

- Act as alternate Emergency Coordinator
- Conduct weekly and semi-annual inspections
- Conduct quarterly visual sampling
- Conduct semi-annual sampling
- Complete DMRs
- Ensure loading areas are kept clean of debris

2.0 **SITE DESCRIPTION**

Har-Conn, located at 603 New Park Avenue, West Hartford, Connecticut, is a metal plating facility. Har-Conn is bordered by commercial facilities to the east (across New Park Avenue), north and south, and a mix of industrial and commercial sites to the west (across Grassmere Avenue).

The facility is comprised of buildings, which house the metal plating operations, hazardous and non-hazardous storage areas, and offices. Facility buildings include 593, 603, and 607 New Park Avenue and 80, 82, and 85 Grassmere Avenue.

The building identified as 85 Grassmere Avenue is currently leased by Har-Conn, however Har-Conn plans to purchase the property in the near future. 85 Grassmere Avenue is not contiguous with the rest of the property, however no industrial operations occur on this site, and it is not included in this plan, although it is included on **Figure 2** for clarity. The property is used for indoor equipment storage only.

The building enumerated 607 New Park Avenue is primarily used for record storage, the facility maintenance department, and as a cafeteria. Metal plating processes are not conducted in 607 New Park Avenue building; however, a sump pump is in use at this location as part of stormwater management.

Material storage is located within the operations buildings, a storage shed, a garage and hazardous chemical trailers, which are primarily on the 593 New Park Avenue parcel. During the site inspection, two dumpsters were located within the paved parking area on the western side of the parcel, abutting Grassmere Avenue. Dumpsters are used for general rubbish and recycling. The dumpsters are covered while not in use.

A Quonset Hut is located on the southwest portion of the site, on the 82 Grassmere Avenue parcel, currently used to house empty drums.

Scrap metal is stored under cover, located adjacent to the eastern side of 80 Grassmere Avenue.

The main loading docks used for shipping and receiving are located on the west side of the 603 New Park Avenue building. Additional loading docks are located on the north side of the 593 Park Avenue Building, near the parking area.

One pad-mounted transformer is located adjacent to the northwestern corner of the 603 New Park Avenue building.

Scrap metal stored for recycling is maintained on a concrete pad under a post supported roof secured within wire fencing. All processing and plating operations are inside the buildings.

Onsite industrial activities include:

- Metal plating, painting, anodizing, passivation of stainless steel, titanium cleaning, dry film lubricants, phosphating, and high temperature aluminum coating (HTAC) processes;
- Delivery and storage of metal stock and recyclable metals;

- Delivery and storage of raw materials;
- Storage and shipping of finished products; and
- Storage and removal of waste chemical products.

The site features are depicted on **Figure 2**, the Site Map.

All activities with the potential for exposure to precipitation/surface runoff are included in **Sections 2.2** and **2.3**. Har-Conn's hazardous waste storage areas are maintained on the northwest portion of the site in trailers and designated buildings. Hazardous waste is stored indoors and does not contribute pollutants to stormwater discharge. Har-Conn does not conduct vehicle washing or maintenance onsite.

The total size of the property is 4.19 acres; however, Har-Conn's industrial activity is limited to the six Drainage Areas (DAs) with overall area and total impervious coverage estimated at 3.5 acres as listed below:

Drainage Area	Total Size	Impervious Cover
DA-1	1.14 Acres	1.04 Acres (~91%)
DA-2	1.85 Acres	1.8 Acres (~95%)
DA-3	0.26 Acres	0.26 Acres (~100%)
DA-4	0.15 Acres	0.15 Acres (~100%)
DA-5	0.26 Acres	0.20 Acres (~77%)
DA-6	0.25 Acres	0.23 Acres (~90%)
~ = approximately % = Percent		

2.1 Site Drainage

The Site Map (**Figure 2**) shows various site features including stormwater drainage, overland flow direction, and the locations where stormwater samples are to be collected.

The facility has six DAs identified as DA-1 through DA-6. These six basins account for the entire property.

The DAs are discussed below.

2.1.1 Industrial Activities

DA-1

Stormwater runoff from DA-1 includes areas associated with 80 Grassmere Avenue, 593 New Park Avenue, and 603 New Park Avenue. Runoff is collected and diverted through roof downspouts, sheet flow over gravel and bituminous pavement, catch basins, and associated underground drainage pipes located on the northwestern portion of the facility.

There are four catch basins in DA-1; the first is located in the northwestern edge of the parking area west of the 593 New Park Avenue building and discharges to another catch basin located to the southwest, along the paved parking area northwest of 80 Grassmere Avenue. This catch basin also receives runoff collected from two catch basins located within the loading dock adjacent to the northwest corner of 603 New Park Avenue

Roof downspouts from the southwestern side of 593 New Park Avenue discharge into a small grassy area between 593 and 603 New Park Avenue. Downspouts on the western side of 603 New Park Avenue discharge to paved areas. This water sheet flows into the catch basin system within DA-1 and is eventually discharged to the MS4. Stormwater generated on the rooftop of 80 Grassmere is collected into an interior roof drain that ultimately discharges to the MS4 via an underground pipe to SW 001.

Stormwater is discharged via a reinforced concrete pipe (RCP) to stormwater system located in the western parking area. Stormwater ultimately discharges to the City of West Hartford's MS4 system via a catch basin located on Grassmere Avenue. This catch basin is identified as SW001.

An additional catch basin is located adjacent to the storage shed along the eastern side of 80 Grassmere. This catch basin is a dry well and is not connected to the stormwater collection system.

Activities within DA-1 include abrasive finishing, plating, painting, anodizing, and wastewater treatment. Exhaust systems are located on 80 Grassmere, 593 New Park, and 603 New Park Avenue for abrasives, nitric acid, dichromate, wastewater treatment, degreaser, and HTAC. Wastewater generated during processes at 80 Grassmere and 593 New Park is collected into totes, transported via forklift, and transferred to the wastewater treatment system located within 603 New Park Avenue.

Additional potential sources for stormwater runoff in DA-1 include exposure to raw or waste materials related to the facilities processes. Two hazardous chemical storage trailers are located on the northwest corner of the site. One storage shed used for hazardous waste is located on the northernmost portion of the paved parking area. Waste is stored in 55-gallon drums and maintained on spill containment pads. Pallets and scrap metal were observed on the gravel area along the western side of the hazardous waste storage shed. A limited amount of out of service equipment was observed in this area.

Two dumpsters one for refuse and one for recycled cardboard are maintained on the east central portion of the gravel parking area. Scrap metal is stored in an outdoor storage shed on the western side of the 593 New Park Avenue building.

This DA also includes a single pad-mounted transformer adjacent to the northwest corner of 603 New Park Avenue. The transformer is owned and maintained by Eversource Energy. The unit should be regularly inspected for any evidence of leaking. Should evidence of leaking be noted Eversource should be contacted.

Potential sources of stormwater pollution associated with DA-1 include the following:

- Exhaust for painting, metal plating, anodizing, and abrasive blasting;
- Boiler room condensate (603 New Park Avenue);

- Raw material delivery;
- Finished product shipping;
- Roof drains;
- Hazardous waste removal;
- Transfer of wastewater to treatment system in 603 New Park Avenue;
- Uncovered metal stock and recyclable metal storage; and
- Uncovered wooden pallets.

DA-2

DA-2 consists of landscaped areas to the east and a paved parking area south of 603 New Park Avenue. Stormwater is transported via roof downspouts and sheet flow. Roof downspouts located on the eastern portion of the building collect water in the vicinity of a rooftop heating, ventilation, and air-conditioning (HVAC) system and discharge to an underground polyvinyl chloride (PVC) pipe that eventually leads to the municipal storm drain system located on New Park Avenue. Roof drains on the southern side of the building discharge to the paved parking area and flow via sheet flow along the driveway to the municipal storm water system after traveling along New Park Avenue. There are no catch basins for this DA.

The roof drains are accessible at the outfall (SW002) located in the grassy area adjacent to the eastern side of the building, prior to final discharge to the MS4.

The rooftop of 603 New Park Avenue includes HVAC and exhaust systems. Exhaust systems on the eastern portion of the building include vents which may be associated with wastewater treatment, nitric acid, hydrochloric acid, alkaline cleaning and other miscellaneous plating processes. An additional hazardous waste storage area is maintained indoors within the 603 New Park Avenue building and will not come into contact with stormwater.

Potential sources of stormwater pollution associated with DA-2 include the following:

- Exhausts systems associated with wastewater treatment and metal plating; and
- HVAC system.

DA-3

Stormwater in DA-3 consists of roof downspouts, sheet flow, and underground piping that discharges to a catch basin (SW003) located in the paved parking located on the western side of 82 Grassmere Avenue.

A Quonset hut canopy is present on the southern portion of the site. The hut is used for the storage of empty drums. Covered storage is also maintained directly south of 80 Grassmere Avenue, used for product storage.

During the site inspection, a roll off and dumpster, along with out of service equipment parts were observed.

One nitric acid exhaust system is located on the eastern side of the building on a concrete pad.

Industrial processes in DA-3 include HTAC, dry film lubricants, passivation of stainless steel, and titanium cleaning.

Potential sources of stormwater pollution associated with DA-3 include the following:

- Nitric acid emitted from exhaust;
- Waste from the dumpster and roll-off
- Wooden pallets; and
- Out of service equipment and metal storage.

DA-4

Stormwater in DA-4 consists of roof downspouts that connect to a 6-inch PVC pipe which then runs under a landscaped area and discharges on the eastern side of the building into a grassy area. Downspouts are located in the vicinity of rooftop exhaust systems associated with nitric acid processes, wastewater treatment, and a vapor degreaser. Overland flow is eventually received by the MS4 system via a sheet flow to a catch basin located on New Park Avenue.

SW004 is representative of the flow collected from the roof to the MS4. It is located directly on the northeast corner of the 603 New Park Avenue building.

Potential sources of stormwater pollution associated with DA-4 include the following:

- Rooftop exhaust systems (nitric acid, wastewater treatment)

DA-5

DA-5 consists of sheet flow over the bituminous paved parking area on the northern side of 603 New Park Avenue. Sheet flow over the bituminous paved parking area is collected in a catch basin on the eastern side of the parking lot. The catch basin drains to an underground stormwater system treatment system prior to discharging to the Town's MS4 which eventually discharges to Trout Brook.

Potential sources of stormwater pollution associated with DA-5 include the following:

- Incidental spills from personal vehicles.

Since this DA is not expected to be impacted by industrial activities, this discharge point from this DA (SW005) will not require monitoring.

DA-6

Stormwater in DA-6 consists of roof downspouts on the northern side of 593 New Park Avenue and

sheet flow over the bituminous paved parking area which is collected into catch basins that discharge to the MS4.

Potential sources of stormwater pollution associated with DA-6 include the following:

- Incidental spills from personal vehicles.

Since this DA is not expected to be impacted by industrial activities, this discharge point from this DA (SW006) will not require monitoring.

2.2 Inventory of Exposed Materials

Table 3 is an inventory of raw material storage and their associated potential pollutants that are exposed to stormwater at the Har-Conn facility, which are potential sources of stormwater pollution.

2.3 Summary of Potential Pollutant Sources

The narrative following **Table 3** includes information for each Site-Specific Item included in the **Table 3**, Inventory of Exposed Materials, as it pertains to stormwater discharge from the subject site.

Table 3 Inventory of Exposed Material				
Activity	Location and Type of Storage	Site-Specific Items	Potential Pollutants	Outfall (see notes)
Loading and Unloading Operations	Receiving and Shipping Area	Raw materials (metal stock)	Metals	SW 001 SW 003
	Shipping/Receiving Dock	Spent acids, Oil and Grease (O&G), metal hydroxide sludge, cyanide, caustic and corrosive materials, solvents, and abrasives	Acids, cyanide, caustics, O&G	
	Hazardous Waste Storage Containers			
Roof Areas	Facility Buildings	Air handling systems and exhaust systems	Nitrate, Chromium, Cyanide, Total Suspended Solids (TSS)	SW 001, 002, 003 and 004
Outdoor Storage Activities	Adjacent to the northwest corner of facility main building	Pad Mounted Transformer	Potential Polychlorinated Biphenyls (PCBs), O&G	SW 001
	Adjacent to southwestern side of 593 New Park Avenue building	Miscellaneous equipment storage, wooden pallets	Metals, O&G, TSS	SW 001
	Adjacent to shipping area on west side of 603 New Park Avenue	Storage totes and empty polypropylene tank, pallets	TSS	SW 001
	Rear of 607 New Park Avenue	Gas storage in metal cages, miscellaneous equipment storage	TSS, metals	SW 002
	South of 82 Grassmere Avenue	Miscellaneous equipment, pallets	TSS, metals	SW 003

Table 3 Inventory of Exposed Material				
Activity	Location and Type of Storage	Site-Specific Items	Potential Pollutants	Outfall (see notes)
Onsite Waste Disposal Practices	Northwest corner of property	Covered dumpsters for cardboard and general refuse	TSS, metals, O&G	SW 001
	North and east of 80 Grassmere Avenue	Storage units and covered dumpster area	TSS, metals, O&G	SW 001
	South of 82 Grassmere Avenue	Uncovered scrap metal dumpster	TSS, metals	SW 003

2.3.1 Loading and Unloading Operations

Loading Dock Areas

- Metal stock and other raw materials are delivered via the primary loading dock, located behind 603 New Park Avenue, and moved within the facility as needed.
- Materials are moved using forklifts, pallet jacks, hand trucks and by hand within the facility.
- The loading docks are covered and equipped with bumpers to protect materials from contact with stormwater during loading/unloading.
- Har-Conn employees oversee all raw material deliveries and product pick-ups.
- A spill kit is to be located directly next to the loading docks.

Waste Storage Area:

- Hazardous and Non-hazardous waste is stored on the northwest portion of the site in containers and a covered shed. These products are picked up by licensed waste haulers on an as needed basis using forklifts or other equipment.
- Totes may be stored outdoors the day of delivery in anticipation of pick up in good weather.
- A spill kit is located directly nearby in the event of a spill.
- Catch basins are located approximately twenty feet to the west and thirty feet to the west of the storage container.

2.3.2 Outdoor Storage Activities

Miscellaneous Equipment Storage

Pallets and miscellaneous equipment are stored throughout the facility. These are primarily out of service items, and no signs of leaks or staining were observed associated with the equipment. Of particular note was a polypropylene tank, totes, pallets, and miscellaneous large metal components.

Pad Mounted Transformer:

Eversource is responsible for transformer maintenance and any potential leaks. Har-Conn inspects the transformer as part of site inspection for leaks or other signs of potential pollution.

Waste Storage Area:

- Hazardous and Non-hazardous waste is stored on the northwest portion of the site in a trailer building and a covered shed. These products are picked up by licensed waste haulers on an as needed basis using forklifts or other equipment.
- A spill kit is located directly nearby in the event of a spill.

- Catch basins are located approximately twenty feet to the west and thirty feet to the west of the storage container.

2.3.3 Roof Areas

The roof areas are generally comprised of low sloped fully adhere ethylene propylene diene monomer (EPDM) systems. Portions of the main facility building roof areas and rooftops of the Site storage sheds are comprised of commercial grade metal. Exhaust systems are present on 593 New Park Avenue, 603 New Park Avenue, 80 Grassmere Avenue, and 85 Grassmere Avenue. Rooftop HVAC units are present on each of the facility buildings. Building roof downspouts drain into DA-1, DA-2, DA-3, and DA-4 areas.

2.3.4 Outdoor Manufacturing or Processing

Har-Conn does not have any outdoor manufacturing or processing, however, wastewater generated during processes that take place at 80 Grassmere Avenue and 85 Grassmere Avenue is collected in totes and transferred to the wastewater treatment system located in 603 New Park Avenue.

2.3.5 Dust or Particle Generating Processing

Processes that generate dust and particulate take place in 593 New Park Avenue, 603 New Park Avenue, 80 Grassmere Avenue, 82 Grassmere Avenue, and 85 Grassmere Avenue. Exhaust systems are primarily rooftop units. One exhaust system is present on a concrete pad along the eastern side of 82 Grassmere Avenue.

2.3.6 Onsite Waste Disposal Practices

Covered Municipal Solid Waste Dumpster

- All municipal solid waste (trash) from the facility is stored in dumpsters located on the northwest corner of the site. When the trash is collected, the waste hauler's truck pulls the dumpster, removes the trash, and puts the dumpster back in place.
- Additional storage is maintained under cover east of 80 Grassmere Avenue.
- An open top scrap metal dumpster was observed south of 82 Grassmere Avenue.
- Har-Conn must maintain dumpster covers. The covers must be maintained closed when dumpsters are not being actively used and the plug is intact to minimize exposure to stormwater.

2.3.7 Spills and Leaks

A list of spills and leaks of five gallons or more of petroleum products, or of toxic or hazardous substances which could affect stormwater, as listed in section 22a-430-4 (**Appendices B** (Tables II, III, and V) and **D**) of the Regulations of Connecticut State Agencies (RCSA), and 40 CFR 116.4, that occurred at the facility after the date of three years prior to the date of certification of the SWPPP must be maintained. Provided in **Appendix E** is a list of such toxic and hazardous substances.

On February 4, 2026, Har-Conn experienced a spill of approximately 100 gallons of 30% glycol solution in the driveway between 603 and 607 New Park Avenue. Har-Conn staff reported the spill to CT DEEP and were assigned Case Number 202600293. The spill was cleaned using absorbent media and pads. The spill did not reach the stormwater collection system.

The Har-Conn facility has not experienced additional spills in the last three years.

3.0 CONTROL MEASURES

This section of the SWPPP discusses control measures or best management practices (BMPs) that are required by the General Permit and that will minimize pollutant generation, contact with precipitation and run-off, and offsite transport.

The IGP defines the term “minimize” to mean: reduce and/or eliminate to the extent achievable using control measures that are technologically available and economically practicable and achievable in light of best industry practice.

3.1 Person(s) Responsible for Implementing Control Measures

Claudia Diakolambrianos, as identified in **Section 1.5** is responsible for implementing control measures identified in **Section 3.0**.

3.2 Good Housekeeping

Permittees must maintain a clean, orderly facility (e.g., appropriate storage practices, proper garbage and waste management, dust, and litter control measures, etc.) in all areas that are exposed to rainfall and are potential sources of pollution to stormwater. Good housekeeping may include any of the following.

- Maintain cleanliness (i.e., sweeping or vacuuming at regular intervals);
- Raw steel handling storage must minimize the generation of and/or recover and properly manage scrap metals, fines, and iron dust. Raw steel must be contained within the storage handling area when not in use;
- Paints and painting equipment should not be exposed to stormwater;
- Washdown of area may be used, however wastewater generated must be collected and/or treated and properly disposed of. This permit does not authorize the discharge of wash waters containing additives, including detergents, to the ground, storm sewer system, or surface waters;
- Storage of materials such as stormwater discharge is not impacted;
- Garbage, dumpster, and waste management (i.e., maintaining dumpsters with drain plugs and covers);
- Dust control;
- Litter control; and/or

- Other.

3.3 Preventative Maintenance

Preventive maintenance includes but is not limited to: the inspection and maintenance of stormwater management devices, the visual inspection and/or testing of onsite equipment and systems to identify conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters; and the appropriate maintenance of such equipment and systems. These areas are included in the inspections described in **Section 4.0**.

For the purposes of this SWPPP, preventive maintenance at the Har-Conn facility will consist of periodic site inspections of identified potential pollutant sources and the stormwater drainage system to ensure their proper operation including the following:

- Berms and vegetative buffers are inspected periodically for erosion and breaches and mended if necessary;
- Facility equipment undergoes periodic maintenance to avoid breakdowns or failures that could result in discharges of pollutants to stormwater. Facility personnel must inspect the piping, pumps, conveyors, stormwater treatment systems, storage tanks and bins, process and material handling equipment, and material bulk storage areas for corrosion, leaks, support or foundation failure, equipment malfunction, erosion and significant sediment transport, containment breach, and others as part of the preventive maintenance program.

3.4 Spill Prevention and Response Procedures

3.4.1 Spill Prevention

This section identifies areas where potential spills can occur that could affect stormwater, and their respective drainage points.

Per the requirements of Sector AA, Har-Conn must ensure that the necessary equipment to implement a cleanup is available to personnel.

Specifically metal fabricating areas must be maintained with clean, dry, orderly conditions. Use dry clean-up techniques where practicable should be used.

Storage areas for raw metal must be kept free of conditions that could cause, or impede appropriate and timely response to, spills or leakage of materials through implementation of control measures such as the following maintaining storage areas so that there is easy access in the event of a spill and labeling stored materials to aid in identifying spill contents.

Metal working fluid storage areas must be maintained to minimize the potential for stormwater contamination from storage areas for metal working fluids.

Cleaners and rinse water areas spills must be controlled and cleaned up, including 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 when possible.

Har-Conn must minimize the potential for stormwater contamination from lubricating oil and hydraulic fluid operations. Use monitoring equipment or other devices to detect and control leaks and overflows where feasible. Install perimeter controls such as dikes, curbs, grass filter strips, or equivalent measures where feasible. These operations are indoors and away from potential stormwater contact.

Stormwater contamination and accidental spillage must be minimized in chemical storage areas and include a program to inspect containers and identify proper disposal methods. The permittee must implement impermeable secondary containment in these areas in accordance with Section 4.2.4 as required for both stationery and mobile liquid storage stations.

For the purposes of this section, the IGP defines these areas as *exterior* areas that contain one or more tanks or containers utilized for the storage of *petroleum* products, *liquid chemicals* or for the collection, storage, or treatment of *wastewater*.

The permit requires the following general BMPs in these areas.

- Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.)
- Identify procedures for containing, reporting, and cleaning up spills (**Section 3.4.2**).
- Provide these procedures to the appropriate personnel through Employee Training (**Section 3.12**).
- Provide secondary containment as detailed below.

The following paragraphs described the specific BMPs that are required at various site features. **Table 4** lists those site features and the spill prevention requirement that apply, as well as the type of containment in-place. Where the requirements of the General Permit are not in place, the needed improvements are noted and are included in **Section 7.0**.

Stationary Storage or Storage Areas

Provide one of the following, as applicable:

1. A double-walled aboveground storage tanks (ASTs) or container.
2. For a storage area, tank or container installed after the General Permit authorization date for this facility, an impermeable secondary containment area which will hold at least 110% of the volume of the largest tank or container or 10% of the total volume of all tanks and containers in the area, whichever is larger, without overflow from such secondary containment area.

Mobile or Portable Storage

A mobile or portable above-ground tank or container used for the collection or storage of *wastewater* must comply with the secondary containment requirements listed above for stationary storage, unless the following two requirements are both met.

1. A mobile or portable wastewater tank or container and related appurtenances (i.e., piping, fittings, valves, gauges, alarms, switches, etc.) are designed, operated, and maintained in a manner to prevent releases of wastewater resulting from factors including, but not limited to, physical or chemical damage, tampering or vandalism, freezing, and thawing.
2. For any mobile or portable wastewater tank or container and related appurtenances that are affixed to a trailer, such trailer shall be a registered motor vehicle designed, operated, and maintained to be capable of on-road transport of wastewater at all times.

Note that these secondary containment requirements do not apply to stationary ASTs and treatment containers, and storage areas if such tanks, containers, and storage areas are associated with a discharge authorized by a CT DEEP water discharge permit issued pursuant to Section 22a-430 or 22a-430b of the Connecticut General Statutes (CGS).

Requirements Applicable to Stationary and Mobile Storage

For industrial activities initiated after October 1, 1992, if an impermeable secondary containment area is required as outlined above, such containment area must be roofed in a manner which minimizes stormwater entry to the containment area, except for a containment area which stores tanks or containers of 100-gallon capacity or more, in which case a roof is not required.

Stormwater that accumulates in a containment area may be discharged only after testing confirms that it contains none of the relevant pollutants stored therein. For petroleum storage containment areas, visual inspection for a sheen fulfills this requirement. If testing is not conducted or if visual observations indicate the presence of a relevant pollutant, the containment water must be treated and/or disposed of according to CT DEEP and federal regulations.

Dumpsters

All dumpsters, trash compactors, and "roll-off" containers used to store waste or recyclable materials must meet the following conditions:

- Sound, watertight condition;
- Drain plugs are intact;
- Covers are intact, or otherwise are maintained in roofed areas that prevent exposure to rainfall; and
- Do not allow dumpster leakage to enter the stormwater drainage system.

All covers on dumpsters not under a roof must be closed when dumpsters are not being loaded or unloaded.

Loading Docks

For all industrial activities initiated after July 15, 2003, loading docks (excluding those that allow a vehicle to enter the building) must be protected with a permanent roof or other structure that protects the loading dock from direct rainfall. Stormwater collection and drainage facilities adjacent to the loading dock shall be designed and maintained in a way that prevents any materials spilled or released at the loading dock from discharging to the storm sewer system.

Table 4 Spill Prevention ⁽¹⁾ Best Management Practices							
Area	Site Feature	Containment				Roof Required ⁽⁴⁾	Improvements Needed
		Stationary ⁽²⁾		Mobile/Portable ⁽³⁾			
		Double- Walled	110% or 10%	DMV Trailer	Release Prevention		
Mobile/ Portable Storage	Wastewater is transferred in totes via forklift to the wastewater treatment system located within 603 New Park Avenue. A breach of the totes would have the potential to be exposed to stormwater.	NA	NA	NA	X	NA	None
	Hazardous waste is transferred to storage containers located on the northwestern portion of the Site. A breach during transport would have the potential to be exposed to stormwater.	NA	NA	NA	X	NA	Cover nearby catchbasins when transporting hazardous waste to or from storage area

Table 4 Spill Prevention ⁽¹⁾ Best Management Practices						
	Covered Dumpsters (2) (nonhazardous waste, cardboard)	Spill Prevention BMP ⁽⁵⁾			Roof and Drainage Control	Improvements Needed
		Sound and Watertight	Cover Intact	Drain Plug Intact		
Waste and Recyclables Dumpsters/ Containers		X	X	X	--	None
	Scrap metal dumpster, exterior southwest corner of 593 New Park Avenue. Sides of structure are enclosed with metal fencing allowing for exposure to stormwater.				--	Scrap metal dumpster should be under cover or have a lid in place
Loading Docks ⁽⁶⁾	Loading docks have bumpers with a cover	Roofing System ⁽⁷⁾			Adjacent Drainage Facilities	Improvements Needed
		Roof	Bumper/ Seal System	Other System		
		X	X	--	Catch basin	Cover catchbasins during transfer operations using rubber mat to prevent spills from entering catch basin
Footnotes:						
(1) These requirements apply to exterior liquid storage areas that have the potential to be exposed to stormwater. X = Existing BMP (X) = Recommended BMP						
(2) One of three options must be provided. See text for applicability details (e.g., 100% vs. 110% containment).						
(3) A mobile or portable wastewater collection, storage, or treatment feature must meet one of the three options for stationary features. See text for applicability details.						
(4) In addition to other containment requirements, site features requiring secondary containment that were initiated after October 1, 1992, must also be roofed.						
(5) All three BMPs must be in-place or dumpster must be under roof in area where drainage will not be exposed to stormwater.						
(6) These requirements apply to site features that were initiated after July 15, 2003.						
(7) One of three options must be provided to protect dock from direct rainfall						

3.4.2 Spill Response

In the event of a release, the facility personnel who first notice the release must evaluate the nature and extent of the release to determine whether the release is "incidental" or "uncontrolled".

Due to Har-Conn's classification as Sector AA, special attention must be paid to chromium, toluene, pickle liquor, sulfuric acid, zinc and other water priority chemicals, and hazardous chemicals and wastes. These products must be stored indoors, under cover. Should spills occur, immediate response should be taken to prevent exposure to stormwater. Movement of these products between buildings should only occur using closed containers using methods to prevent spills and leaks.

Only spill responses to incidental releases of hazardous substances, including petroleum products and wastewaters, where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area with materials on-hand are performed by Har-Conn personnel as described below.

Figure 3 is a flow chart diagram that provides a procedure for responding to a spill or other release at the facility. This figure may be posted at appropriate locations where it will be quickly accessible in an emergency.

3.4.2.1 Incidental Release Response Procedure

Facility personnel:

- Absorb, neutralize, or otherwise control the release using the available solid absorbent materials.
- Determine if additional response help is necessary.
- Collect any used absorbent material and place the collected material in the dedicated container.
- Replace spill response materials, as necessary.

The Facility Operator or designated representative:

- Immediately notify the following:
 - Primary and Alternate Coordinators

If the release qualifies as reportable according to the Connecticut release reporting guidelines in **Figure 4**, per CGS 22a-450-6. Spills will be reported utilizing this flow chart to CT DEEP as described below for all oils, chemical substances, and listed Appendix A items of CGS 22a-450-6. A copy of hazardous and chemical substances is provided in **Appendix E** of this SWPPP.

- CT DEEP Emergency Response and Spill Prevention **(860) 424-3338**.
Should this number be unavailable, call **1-866-337-7745**.

- If additional response help is deemed necessary, immediately bring to the attention of the PPT Coordinator. The Coordinator will contact an approved cleanup contractor to assist in the release response.
- Document the release using the form in **Appendix C**.
- Upon completion of the spill response, notify the Coordinator. They will make the necessary arrangements to have the waste material transported and disposed by an authorized waste handler.

3.4.2.2 Uncontrolled Release Response Procedures

Facility personnel should take ***no response actions*** beyond the following:

- Sound fire alarm to initiate evacuation from the area of the release.
- Stop all work immediately.
- Shut off all equipment.
- Assemble at designated emergency meeting location(s).
- Determine if any personnel require immediate medical attention and contact medical professionals, as necessary.
- Follow the instructions of the Pollution Prevention Coordinator or designated representative.

The Pollution Prevention Coordinator or designated representative:

- Immediately notify the following:
 - Alternate Coordinator or PPT members
 - Spill response contractor:

Contractor Name	24 Hour Emergency Response Number
Clean Harbors	1-800-645-8265

- Implement corresponding emergency programs (i.e., SPCC, Integrated Contingency Plan (ICP), etc.)

If the release qualifies as reportable according to the Connecticut release reporting guidelines in **Figure 4** per CGS 22a-450-6. Spills will be reported utilizing this flow chart to CT DEEP as described below for all oils, chemical substances, and listed Appendix A items of CGS 22a-450-6. A copy of hazardous and chemical substances is provided in **Appendix E** of this SWPPP.:

- Local Emergency Response **911**.
- CT DEEP Emergency Response and Spill Prevention **(860) 424-3338**.
Should this number be unavailable, call **1-866-337-7745**.
- National Response Center (NRC) **1-800-424-8802**.
- Update local, state, or federal responders on the status of all personnel and site conditions as they arrive.

- Document the release using the form in **Appendix C**.

3.4.2.3 Release Documentation and Submittal

The Pollution Prevention Coordinator or designated representative should document the spill utilizing the form provided in **Appendix C**. Upon request, this form and other documentation will be submitted to CT DEEP. Spills shall be cleaned up and documented in compliance with Connecticut Release-Based Cleanup Standards.

3.5 Minimizing Exposure

Har-Conn must minimize exposure to stormwater of materials identified in **Table 3**, the Inventory of Exposed Materials. Generally, this means ensuring protection of catch basins and the potential for discharge to stormwater during loading/unloading operations as described above.

Per the requirements of Sector AA, stormwater exposure to raw and processed metals and paints must be minimized. These products are used indoors and maintained under cover when stored outdoors.

All process chemicals once unloaded from delivery vehicles are stored within trailers or stored under a permanent roof or cover.

3.6 Roof Areas

Roof areas should be inspected periodically to make sure rooftop HVAC unit or associated lines have not leaked. Additionally, collection systems and/or scrubbers should be maintained to reduce emissions from exhaust systems. Rooftop exhaust systems should be inspected for leaks, accumulation of solids, staining or other indicators of particulate matter that contribute to stormwater pollution.

3.7 Floor Drains

No floor drains located in the facility drain to the stormwater system per Har-Conn staff. Floor drains which connect to the sanitary sewer system must be in accordance with applicable state and local guidelines.

3.8 Solid De-Icing Material Storage

Har-Conn does maintain temporary storage piles of de-icing materials (including pure salt, salt alternatives or either of these mixed with other materials) during winter months at this facility. All de-icing materials are kept under cover while being stored and are not susceptible to exposure to stormwater.

3.9 Vehicle or Equipment Washing

Har-Conn does not wash vehicles or equipment onsite.

3.10 Sediment and Erosion Control

Unpaved areas at the Har-Conn site primarily consist of isolated grassy areas. Areas of degraded pavement are stable and not eroding.

All construction activities on site shall be conducted in accordance with the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control and the "Future Construction" section of the stormwater General Permit.

3.11 Management of Runoff

The General Permit requires investigation of the need for stormwater management or treatment practices that could be used to divert, infiltrate, reuse, or treat stormwater runoff in a manner that minimizes pollutants in stormwater discharges from the site. Any evaluation, construction, or modification of the design of a stormwater drainage system requires certification by a professional engineer licensed to practice in the State of Connecticut. The permittee shall implement and maintain stormwater management or treatment measures determined to be reasonable and appropriate to minimize the discharge of pollutants from the site.

If infiltration practices are implemented, they must avoid ground water contamination in accordance with Appendix C of the General Permit. Stormwater infiltration measures implemented within an aquifer protection area, as mapped by CT DEEP, must be conducted pursuant to the relevant sections of the CT DEEP Aquifer Protection Regulations.

Following are examples of practices that should be considered:

- divert uncontaminated run-on to avoid areas that may contribute pollutants
- reuse of collected stormwater (such as for process water, cooling water or as an irrigation source)
- treatment technologies (e.g., swirl concentrators, sand filters, etc.)
- snow management activities

Any practices put in place must be designed, implemented, and maintained in accordance with the CT DEEP Stormwater Quality Manual.

3.12 Employee Training

All employees whose activities may affect stormwater quality will receive training within 90 days of employment and at least once a year thereafter to make them familiar with the components and goals of the control measures contained in this Plan.

Training will be conducted or supervised by a member of the PPT or other qualified person and a written record must be maintained in the Plan, including the following:

- Date(s),
- Employee name,

- Employee responsibility, and
- Training agenda.

Training content will include the following:

- An overview of the SWPPP,
- Spill response procedures, emergency equipment location, good housekeeping, maintenance requirements, and material management practices,
- The location of all controls listed in this SWPPP, and how they are to be maintained,
- The proper procedures to follow with respect to the control measures on site,
- When and how to conduct inspections, record applicable findings, and take corrective actions, and
- The facility's emergency procedures.

Har-Conn employees who may need to receive stormwater training include onsite staff, and maintenance employees. Training documentation is included in **Appendix D** to this Plan.

3.13 Schedule for Controls

The schedule for controls identified under this section are provided in the implementation schedule under **Table 8** in **Section 7.2** of this SWPPP.

3.14 Items Necessary to Implement Controls

Provided below is a list of essential items necessary to implement controls identified under this section.

- Engineering controls including covers for catch basins within DA-1 which may be impacted by deliveries and pick-ups, sandbags, dumpster covers.
- Spill Kit materials, including absorbents, dikes, booms, pig mats, etc.
- Personal Protective Equipment (PPE), including nitrile gloves, Tyvek suits, rubber boots, etc.
- Housekeeping materials such as brooms and dust pans for sweeping of material.

3.15 Future Construction

Note that any construction activity that disturbs greater than one acre must be conducted in accordance with the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* (most current version at the time of construction). All construction activities, regardless of size, must comply with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2004 Connecticut Stormwater Quality Manual for the design and implementation of post-construction stormwater management measures. In addition, the General Permit requires that, wherever possible, the use of copper or galvanized roofing or building

materials for any new building construction be avoided where these materials will be exposed to stormwater.

Note that all construction activities onsite must be conducted in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control (Guidelines) and the "Future Construction" requirements included in **Section 3.15**.

3.16 Spill and Leaking Listing

The General Permit requires that this SWPPP include a record of all spills or leaks of five gallons or more of toxic or hazardous substances that have been exposed to stormwater runoff at the facility, and that have occurred since October 30, 2023 of petroleum products, or of toxic or hazardous substances which could affect stormwater, as listed in Section 22a-430-4 (**Appendices B** (Tables II, III and V) and **D**) of the RCSA, and 40 CFR 116.4, that occurred at the facility after the date of three years prior to the date of certification of the SWPPP.

A Spill Incident Log is attached in **Appendix C** for completion as part of this SWPPP for any qualifying spill or release.

Har-Conn personnel reported at the time of the SWPPP drafting that one spill of five gallons or more of toxic or hazardous substances has been exposed to stormwater runoff as a result of their industrial activity during this time frame. Details on this spill can be found in **Section 2.3.7** of this Plan.

Apart from this recording requirement of the IGP, CT DEEP, under statutory authority, requires *any* chemical or oil spill of *any* quantity ***which poses a potential threat to human health or the environment*** to be reported immediately to (860) 424-3338 or 1-866-337-7745 per **Section 3.4** of this SWPPP.

3.17 Inactive or Unstaffed Site Controls

The site is staffed; therefore, inactive or unstaffed site controls are not applicable.

3.18 Sector Specific Requirements

Har-Conn falls under Sector AA, fabricated metal products. In addition to the general control measures mentioned above, Har-Conn must comply with the following sector specific requirements.

Har-Conn is also required to monitor for Aluminum in addition to the general parameters of the General Permit, as highlighted under **Section 5.0**.

Harr-Conn must minimize the generation of and/or recover and properly manage scrap metals, fines, and iron dust. Include measures for containing materials within storage handling areas. Additionally, paints and painting equipment must be minimized to prevent exposure to stormwater. **Section 3.2** and **3.5** include specific requirements.

Additional spill prevention requirements for metal fabrication, metal storage areas, metal working fluids, cleaners, and rinse water, lubricating or hydraulic oils, and chemical storages are highlighted under **Section 3.4**. These areas will be maintained in an orderly fashion and be kept assessable to allow for a spill response. Any spill will be cleaned up immediately.

Figure 2 has also been updated for additional sector specific requirements.

Sector specific inspection requirements are incorporated under **Appendix F**.

4.0 INSPECTION PROGRAM

4.1 Semi-Annual Inspections

Comprehensive site inspections conducted by qualified personnel are required twice a year. *Inspections should be made during rainfall events if possible.* These inspections should be performed during normal facility hours. Such inspections must, at a minimum, include:

- A. Visual inspection of material handling areas and other potential sources of pollution identified in the Plan for evidence of, or the potential for, pollutants entering the stormwater drainage system. Structural stormwater management measures, erosion control measures, structural and non-structural control measures, stormwater conveyance and management systems, resilience measures and other pollution prevention measures identified in the SWPPP Plan shall be observed to ensure that they are implemented and maintained properly. A visual inspection of equipment needed to implement the plan, such as spill response equipment, shall be made.
- B. Preparation of a report summarizing the scope of the inspection, personnel making the inspection, the date(s) of the inspection, major observations relating to the Plan, actions taken, and updates made to the Plan shall be made and retained as part of the SWPPP for at least five years. The report shall be signed by the permittee, specifically by a responsible corporate officer or a duly authorized representative, as defined in Section 22a-430-3(b)(2) of the RCSA.

As indicated in **Section 1.2**, it is a requirement of the General Permit that the SWPPP be kept current by making any necessary revisions identified through the semi-annual inspection. Inspection reports are included as **Appendix F**.

4.2 Monthly Inspections

In addition to the Semi-Annual Inspections required above, the permittee shall identify in the Plan qualified personnel to visually inspect designated equipment and specific sensitive areas of the site at least monthly. A written set of tracking or follow-up procedures shall be used to ensure that appropriate actions are taken in response to the inspections. Records of routine inspections shall be maintained in the Plan kept onsite.

4.3 Inspection Log and Report

Appendix F contains a Stormwater Inspection Log and Report that can be used to document the Semi-Annual and monthly inspections. These reports must be maintained onsite for at least five years.

5.0 **MONITORING AND REPORTING**

All permittees are required to monitor quarterly, semi-annually, and annually as required below. Additional monitoring procedures, frequencies, and parameters depend upon the nature of the permittee's industrial activity, the level of pollutants in the stormwater discharge, and the nature of the receiving water. Monitoring will be conducted by a qualified person(s)

Har-Conn may be required to modify this SWPPP and its specific control measures based on monitoring results, per **Section 5.7**.

5.1 Quarterly Monitoring Requirement

All permittees must conduct quarterly *visual* stormwater monitoring for the entire term of the permit. Quarters are January – March, April – June, July – September, and October – December. Samples must be collected in such a way that they are truly representative of the stormwater discharge (72-hour discharge-free and collected within the first thirty minutes of discharge). The visual assessment must be made in a clean, clear glass, or plastic container, and examined in a well-lit area.

Visual sampling criteria include:

- Color
- Odor
- Clarity
- Floating solids
- Settled solids
- Suspended solids
- Foam
- Oil sheen
- Other obvious indicators of stormwater pollution

If the visual monitoring cannot be completed within the first thirty minutes of discharge, it must be collected as soon as is feasible and documentation on why it was not possible must be recorded. If the discharge includes snowmelt, samples must still be collected during a period with a measurable discharge and qualifying storm event.

Based on the above criteria, if the visual inspection indicates the control measures are inadequate or are not being properly operated and maintained, Har-Conn must review and revise the selection,

design, installation, and implementation of the control measures to ensure the condition is eliminated. The permittee must also maintain documentation of these procedures in the SWPPP Plan.

Appendix G contains a Quarterly Visual Stormwater Monitoring Log that should be completed for each quarterly event and each outfall monitored and then filed with this Plan and maintained for at least five years.

5.2 Semi-Annual and Annual Monitoring

Semi-annual storm water monitoring, in the form of sampling and laboratory testing, is required to be conducted by Har-Conn. One monitoring event should be conducted during each of the following designated periods.

- January – June
- July – December

Monitoring events must be conducted at least thirty days apart. Monitoring shall be conducted for the parameters listed below:

- Chemical Oxygen Demand (COD) (milligrams per liter (mg/L))
- Total O&G (mg/L)
- pH (standard units (SU))
- TSS (mg/L)
- Total Phosphorus (mg/L)
- Total Kjeldahl Nitrogen (TKN) (mg/L)
- Nitrate as Nitrogen (mg/L)
- Total Copper (mg/L)
- Total Lead (mg/L)
- Total Zinc (mg/L)

Monitoring shall also be completed for Sector AA specific requirements of:

- Total Aluminum (mg/L)

Annual monitoring shall be conducted for Aquatic Toxicity during the first year following authorization of this permit. This parameter is to be included in one of the two regularly scheduled semi-annual monitoring events.

5.2.1 Retention of Records

For each measurement or sample collected, Har-Conn must record all of the information on in the NetDMR application of U.S. Environmental Protection Agency's (EPA) Central Data Exchange (CDX)



Discharge Monitoring Report (DMR) for submittal to CT DEEP or as otherwise determined by the Commissioner. Monitoring records shall include:

- place, date, and time of sampling, and the time the discharge started,
- person(s) collecting samples,
- dates and times the analyses were initiated,
- person(s) or laboratory that performed the analyses,
- analytical techniques or methods used, and
- results of the analyses.

All records and information resulting from the monitoring activities required by the General Permit, including all records of analyses performed and any applicable calibration and maintenance of instrumentation, must be retained onsite for a minimum of five years following the expiration of the Permit, or longer if required by CT DEEP.

5.2.2 Benchmark Monitoring

The semi-annual monitoring results must be compared to the stormwater quality benchmarks established by CT DEEP and listed in **Table 5** below.

Table 5 Stormwater Monitoring Parameters	
Parameter	Benchmarks
Discharge pH (Measured Onsite if possible)	5 – 9 SU
Total O&G	5 mg/L
COD	75 mg/L
TSS	90 mg/L
Total Phosphorus	0.4 mg/L
TKN	2.3 mg/L
Nitrate as Nitrogen	1.1 mg/L
Total Copper	0.059 mg/L
Total Lead	0.076 mg/L
Total Zinc	0.160 mg/L
Total Aluminum	0.75 mg/L
(Aquatic Toxicity annual monitoring sample to be included).	----
--- indicates no target goal established by CT DEEP	

After collection of four semi-annual samples, if the average of the four monitoring values for any parameter does not exceed its benchmark, the monitoring requirements for that parameter have

been fulfilled for the permit term. For averaging purposes for any individual sampling parameter analyzed using procedures consistent with "Exemptions for Benchmark Monitoring" section of the permit (i.e., Reasonable Confidence Protocols (RCPs)) (Section 4.5.1.5, which is determined to be less than the method detection limit (MDL), a value of half the MDL reported by the laboratory is to be used. For sample values that fall between the MDL and the reporting level (RL), a value of half the RL reported by the laboratory is to be used.

For discharges to impaired waters without an established TMDL, the monitoring requirements does not apply after the first year of monitoring if the indicator pollutant is not detected above natural background levels, as determined by the Commissioner, in the stormwater discharge or is the result of run-on entering from offsite and the permittee has documented that diversion of this offsite run-on is not feasible or practicable in accordance with "Monitoring Exemption for 'Run-on'" (Section 5.4.7 of the General Permit). In either case, the permittee must provide such documentation to the Commissioner.

5.3 Impaired Water Monitoring

Due to the discharge to the impaired waterbody of Trout Brook, monitoring shall be conducted for E. coli following the authorization of this permit. This parameter is to be included in one of the two regularly scheduled semi-annual monitoring events at an annual frequency. Monitoring shall be conducted per the requirements of **Section 5.2** of this SWPPP.

5.4 Sampling Location

The stormwater discharge outfalls and the sampling/monitoring locations related to the Har-Conn industrial activity are shown on **Figure 2**. Sample collection for quarterly visual, semi-annual, and annual monitoring will be performed at SW001, SW002, SW003, and SW004.

When a facility has two or more outfalls that, based on consideration of features (e.g., grass vs. pavement, slopes, catch basins vs. swales) and activities within the area drained by the outfall, if the permittee reasonably believes discharge substantially identical effluents, only one outfall test is required and the quantitative data reported may serve as representative of the substantially identical outfalls. One outfall test may be substituted for up to five outfalls in this fashion.

Sampling Procedures

All samples shall be collected from discharges resulting from a storm event that occurs at least 72 hours after any previous storm event which generated a stormwater discharge. Any sample containing snow or ice melt must be identified on the DMR form. For samples that discharge through a detention basin or other stormwater management structure, the sample is to be taken at the discharge from the basin or structure. Grab samples shall be taken during the first 30 minutes of the event and shall not be combined. Samples shall be taken at the outfall or nearest feasible location representative of the discharge. The Plan must include a description of the rationale for designating outfalls as representative.

5.5 Reporting Requirements

Discharge Monitoring Reports

DMRs for all monitoring types must be submitted 30 days after receipt of sample results in the first full semi-annual period after discharge authorization (i.e., permit approval). All stormwater discharge monitoring data must be submitted using NetDMR, EPA's electronic DMR system. For samples collected from January 1 to June 30, Har-Conn will submit DMRs on or before August 15. For samples collected from July 1 to December 31, Har-Conn will submit DMRs on or before February 15.

For any of the monitored discharge points that did not have a discharge within the reporting period, Har-Conn will report that no discharges occurred for that discharge point no later than thirty days after the end of the reporting period using the appropriate No Data Indicator (NODI) code on the DMR.

If the monitoring data indicates a violation of a numeric effluent limit, that violation will be reported to the Commissioner within two hours using the online notification form link. It will also be reported on the DMR. Within five days of a violation of a numeric effluent limit, Har-Conn must submit a written Notification of Non-compliance to CT DEEP and enter the corrective action process described in **Section 5.7**.

Numeric Effluent Limitations Notification of Non-Compliance Report

1. General reporting: Har-Conn must report follow-up monitoring data using NetDMR, EPA's electronic DMR tool.
2. Noncompliance Report: Har-Conn must submit an Effluent Limitation Guidelines (ELG) noncompliance report to CT DEEP no later than two hours after it has received the laboratory results utilizing the Notification of Noncompliance Link listed here: <https://portal.ct.gov/DEEP/Water-Regulating-and-Discharges/IndustrialWastewater/Compliance-Assistance/Notification-Reg>
3. Subsequent Report: Har-Conn must submit a written report to the director within five days thereafter utilizing the Notification of Noncompliance link listed above. Such report shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and, if the noncompliance has not been corrected, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
4. Follow-up Monitoring: Har-Conn must conduct follow-up monitoring after the exceedance of an effluent limit at least quarterly in accordance with the schedule in Section 4.6.1 of the General Permit. If an extension is needed, then Har-Conn may utilize the form in Appendix G of the General Permit (provided in **Appendix H** of this SWPPP).
5. Continue to Monitor: If follow-up monitoring indicates another effluent limit violation, Har-Conn must monitor at least quarterly until their stormwater discharge is in compliance with the effluent limit. If quarterly monitoring indicates that an applicable discharge is back in compliance with an ELG, Har-Conn may return to the annual monitoring schedule provided that the Commissioner has been notified using the noncompliance link listed above.

Once Har-Conn has completely fulfilled applicable monitoring requirements, monitoring, and the use of NetDMR is no longer required. If Har-Conn has only partially fulfilled benchmark monitoring and/or impaired waters monitoring requirements, then it will continue to report results in NetDMR for the remaining monitoring requirements. Har-Conn will certify the following changes to their monitoring frequency to CT DEEP by email at DEEP.StormwaterStaff@ct.gov:

- All benchmark monitoring requirements have been fulfilled for the permit term;
- All impaired waters monitoring requirements have been fulfilled for the permit term;
- Benchmark monitoring requirements no longer apply because the Commissioner 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; and
- Benchmark and/or impaired waters monitoring requirements now apply because the facility has changed from inactive and unstaffed to active and staffed.

Annual Report (AR)

Har-Conn must submit an AR by April 15 after each calendar year of permit coverage in accordance with the schedule listed in Section 4.7.3 of the General Permit. The annual report will be submitted electronically via NeT-MSGP (multi-sector general permit) on a template provided by the Commissioner. The annual report shall contain the following:

- A summary of monitoring data;
- A summary of the past year's site inspections;
- A summary of the past year's visual assessments;
- A summary of corrective actions;
- A summary of incidents of noncompliance or a statement of compliance; and
- A certification statement in accordance with Section 3.5 of the permit.

5.6 Other Discharge Requirements

The General Permit contains the following additional discharge requirements.

1. There should be no distinctly visible floating scum, oil or other matter contained in the stormwater discharge. Excluded from this are naturally occurring substances such as leaves and twigs provided no person has placed such substances in or near the discharge.
2. The stormwater discharge should not result in pollution due to acute or chronic toxicity to aquatic and marine life, impair the biological integrity of aquatic or marine ecosystems, or result in an unacceptable risk to human health.

5.7 Corrective Action Measures

Har-Conn shall employ a corrective action process for the following conditions listed in "Summary of Triggering Conditions Requiring Corrective Action Measures (CAMs)" under Section 4.6 in the General Permit and listed below.

- Four Event Average Exceeds the Benchmark Threshold (or Mathematical Equivalent);
- Unauthorized release or discharge;
- Inconsistency with an Applicable TMDL and Wasteload Allocation (WLA)
- Control Measure Not Stringent Enough to Meet Water Quality Standards;
- Control Measure Never Designed, Installed, Implemented, or Maintained;
- Change in Design, Operation, or Maintenance at a Facility;
- Visual Assessment Shows Evidence of Pollution; or
- Other Corrective Actions as Required by the Commissioner.

Immediately (within one to two days) after triggering a CAM condition the Har-Conn will take reasonable steps to minimize contamination (i.e., cleanup identified pollution sources, investigate, and remove the source, etc.).

Follow-up monitoring per **Section 5.0** shall be implemented within thirty days or within the next qualifying storm event. Results will be emailed to DEEP.StormwaterStaff@ct.gov within thirty days of receipt.

Semi-annual monitoring and the CAM process will be continued until the four-event average is below benchmark criteria.

All CAMs and evidence of CAMS will be recorded as part of this SWPPP and be kept per **Section 5.2.1** within 24 hours of such conditions occurring. **Appendix H** can be utilized to document such CAMs, including:

- A description of the condition or event triggering the need for corrective action review and/or response must be included in follow-up documentation;
- Date the condition/triggering event was identified;
- Description of immediate actions taken pursuant to Section 4.6.1 of the General Permit to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean-up completed, notifications made, and staff involved. Also include any measures taken to prevent the reoccurrence of such releases; and
- A statement, signed and certified in accordance with the signatory requirements in Section 3.5 of the General Permit.

5.7.1 Corrective Action Measure Levels

CAM Level 1

The facility shall enter a CAM, beginning with Level 1, if a triggering condition exists. CAM Level 1 shall include:

- Review their SWPPP and the selection, design, installation, and implementation of their stormwater control measures to ensure the effectiveness of existing measures and determine if modifications are necessary to meet the permit condition.
- Implementing additional control measures based on the review.

CAM Level 1 must implement modifications or control measures within fourteen days of being made aware of the condition. If it is infeasible to implement a measure within fourteen days, the permittee may take up to sixty days to implement such a measure. The commissioner may also grant an extension beyond sixty days, based on an appropriate demonstration by Har-Conn.

Follow-up monitoring per **Section 5.0** shall be implemented within 30 days or within the next qualifying storm event. The permittee must report results by email to DEEP.StormwaterStaff@ct.gov within 30 days of receipt. CAMs and/or follow-up monitoring must be documented using the form in **Appendix H**.

CAM Level 2

Cam Level 2 will be implemented if the subsequent inspections and/or monitoring data after CAM Level 1 indicated the triggering condition persists. CAM Level 2 shall include:

- Review the SWPPP again and implement additional prevention/good housekeeping measures beyond what is in place.
- Additional control measures must be considered good engineering practices, beyond what the permittee did in the initial response, which would be reasonably be expected to control the release of the pollutants and abide by the numeric and non-numeric effluent limits.

CAM Level 2 must implement modifications or control measures within fourteen days of being made aware of the condition. If it is infeasible to implement a measure within fourteen days, the permittee may take up to 60 days to implement such a measure. The commissioner may also grant an extension beyond 60 days, based on an appropriate demonstration by Har-Conn.

Follow-up monitoring per **Section 5.0** shall be implemented within 30 days or within the next qualifying storm event. The permittee must report results by email to DEEP.StormwaterStaff@ct.gov within 30 days of receipt. CAMs and/or follow-up monitoring must be documented using the form in **Appendix H**.

CAM Level 3

Cam Level 3 will be implemented if the subsequent inspections and/or monitoring data after CAM Level 2 indicated the triggering condition persists. CAM Level 3 shall include:

- Install structural source controls (e.g., permanent cover, berms, and secondary containment), and/or treatment controls (e.g., sand filters, hydrodynamic separators, oil-water separators, retention ponds, and infiltration structures, where applicable).
- Select and implement controls with pollutant removal efficiencies that prevent or minimize the pollution to stormwater.

CAM Level 3 must implement modifications within fourteen days and install such measures within 90 days. If installation of structural controls is not feasible within 90 days, the permittee may take up to 120 days to install such measures, documenting under the SWPPP per Section 4.3 will include why it is infeasible to install the measure within ninety days. The Commissioner may also grant an extension beyond 120 days, based on an appropriate demonstration by Har-Conn.

Follow-up monitoring per **Section 5.0** shall be implemented within 30 days or within the next qualifying storm event. The permittee must report results by email to DEEP.StormwaterStaff@ct.gov within 30 days of receipt. CAMs and/or follow-up monitoring must be documented using the form in **Appendix H**.

5.7.2 Monitoring Exemption for Run-On

If benchmark values are exceeded as described above and the permittee determines that exceedance is attributable solely to the presence of that pollutant in the natural background (i.e., occurring in rainfall, soils, or groundwater) or in run-on entering from offsite, the permittee is not required to perform corrective action or additional benchmark monitoring provided the five conditions listed in Section 4.5.7 of the General Permit are met (**Appendix A**).

Additional waivers under Section 4.6.2.4 of the IGP may apply.

6.0 RESILIENCE MEASURES

The general permit requires that the Har-Conn implement structural improvements, resilient pollution prevention measures, and/or other mitigation measures that can help to minimize impacts from stormwater discharges from major storm events such as hurricanes, storm surge, extreme/heavy precipitation, and flood events. In preparing this SWPPP, American Society for Testing and Materials (ASTM) E3429-24 was consulted to apply the following guiding principles in assessing property resilience:

- Identifying the natural hazards associated with stormwater likely to affect the property;
- Evaluating the risks posed by those hazards; and
- Identifying structural improvement, resilience measures, or other mitigation measures to reduce impacts.

Table 6 Resilience Measures			
Hazard	Site Perceived Risk Level	Risk Definition	Reference
Hurricane	Low	High – historical impacts via site knowledge or database review	Site knowledge and historical NOAA Hurricane Tracks
Storm surge	Low		Site Knowledge and NOAA Storm Surge Risk Map
Extreme/ heavy precipitation	Low	Low – no known historical impacts to property, materials, storage, or wastes.	Site knowledge of how property is impacted by extreme/heavy precipitation.
Flood Events	High		Federal Emergency Management Agency (FEMA) Flood Maps
NOAA = National Oceanic and Atmospheric Administration			

In consideration Section 4.2 of the General Permit, Har-Conn has developed the following control measures to further minimize pollutant discharges via stormwater during a major storm event.

6.1 Loading Docks and Outdoor Material Storages

When a delivery of exposed materials is expected, and a significant storm is anticipated within 72 hours (three days), the delivery will be delayed until after the storm whenever possible. Additionally, materials that arrive before the storm will be stored in their appropriate destinations before the onset of the storm. Materials, capable of being moved, stored outside or near the loading docks will be temporarily relocated within the building until the storm has subsided. Portions of the site prone to flooding will be assessed for any materials which may need to be moved or fastened in place.

6.2 Deliveries

When a delivery of exposed materials is expected, and a storm is anticipated within 72 hours (three days), delay delivery until after the storm or store materials as appropriate.

6.3 Mobile Equipment

Mobile equipment, materials, and waste will temporarily be relocated inside or to higher ground above the base flood elevation. Vehicles shall be relocated above the base flood elevation.

6.4 Administrative Controls

Scenario-based emergency procedures will be developed for major storms. These procedures will be complementary to regular stormwater pollution prevention, EAP, SPCC, and/or ICP.

Staff training for implementing the facility's emergency procedures will be conducted annually and upon hire per **Section 3.12** of the SWPPP.

6.5 Flood Plan

Due to Har-Conn's proximity to Trout Brook a portion of Har-Conn facility and property fall within the FEMA 100-year flood plain, as depicted on **Figure 5**. The site and buildings sit approximately fifteen to twenty feet above the water surface elevation of the river.

The site is primarily in Zone X and is protected from the 1% annual chance flood by a levee subject to failure during larger floods.

In addition to a Flood Emergency Response Plan, this SWPPP also requires a stock of sandbags be maintained.

7.0 RECOMMENDATIONS AND IMPLEMENTATION SCHEDULE

7.1 Recommendations

HRP recommends that Har-Conn implement the general provisions of this plan by following the BMPs and other procedures detailed in **Sections 2.0** through **6.0** of the Plan, as summarized below.

No.	Section	Pollution Prevention Activities
1.4	Amendments to Plan	Update plan as needed
2.3	Summary of Potential Pollutant Sources	General practices and procedures
2.4	Spills and Leaks	Recordkeeping and reporting
3.0	Control Measures	BMPs and activity-specific requirements
4.0	Inspections	Monthly and Semi-Annually, recordkeeping
5.0	Monitoring	Sample collection, analysis, recordkeeping, and reporting

Table 7 contains the site-specific actions that HRP recommends, and **Table 8** includes implementation deadlines for these actions.

Table 7 Site-Specific Recommendations		
No.	Recommendation	Section of SWPPP for Details
1	Cover scrap metal dumpster	Section 3.3.1 Table 4
2	Use mats to cover catch basins during transport of hazardous and non-hazardous wastes in northern portion of site	Section 3.4
3	Cover miscellaneous equipment and pallets when not in use to prevent stormwater contamination	Section 3.2
4	Install secondary containment for the sump associated with the nitric acid passivate solution scrubber	Section 3.4

Table 7 Site-Specific Recommendations		
No.	Recommendation	Section of SWPPP for Details
5	Develop and Implement a Flood Emergency Response Plan	Section 6.5

7.2 Implementation Schedule

The General Permit requires that schedules and procedures for implementation of control measures, monitoring and inspections be established in the SWPPP. **Table 8** is a comprehensive Implementation Schedule, as required by the General Permit. Note that the table lists both routine events such as inspections, preventative maintenance, and monitoring, as well as the site-specific recommendations listed above in **Table 7**.

Table 8 Implementation Schedule														
Program	Frequency	Duration	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.
Reporting	Annual	Ongoing				X								
Inspections	Semi-annual	5 years	X (recommended in October-November)			X (recommended in April-May)								
	Monthly		X	X	X	X	X	X	X	X	X	X		
	Quarterly Visual	5 years	X	X	X	X	X		X				X	
Monitoring	Semi-annual Benchmark	≥2 years	X			X								
	Annual Aquatic Toxicity	1 year	X (during 1 of the 2 semi-annual events)											
	Annual Impaired waterbody monitoring	Ongoing	X (during 1 of the 2 semi-annual events)											
	Training	Annual	5 years	X										
Spill Prevention (Table 4)	Implementation Deadline/Tab/e	Ongoing												
Site-Specific Recommendations (Table 7)	Immediate	Ongoing												
Preventative Maintenance	Annual	Ongoing												

8.0 ADDITIONAL DOCUMENTATION AND REVIEW

As part of this SWPPP preparation the following repositories and databases were reviewed for applicability.

- Coastal Consistency
- Natural Diversity Data Base
- Conservation or Historic Preservation Restriction Information
- Aquifer Protection

The site was not noted to be in a location within coastal boundaries, a protected location noted within the Natural Diversity Data Base, or in a location of conservation or preservation restriction.

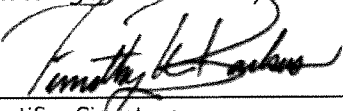
9.0 CERTIFICATION

9.1 Certification by Har-Conn Chrome Company

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 Har-Conn Chrome Company for an activity located at 603 New Park Avenue, West Hartford, CT 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 Regulations of Connecticut 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 Regulations of Connecticut State Agencies and any other applicable law.



Certifier Signature

Timothy K. Backus
Certifier Name

3/17/2026
Date

President and CEO
Certifier Title

Har-Conn Chrome Company
Site/Facility Name

General Permit No.

603 New Park Avenue, West Hartford, CT
Site/Facility Address

9.2 Certification by Professional Engineer/Certified Hazardous Material Manager

The certifications on the following are made by HRP in accordance with the NPDES IGP, *version effective October 1, 2025, and the site visit conducted by HRP on October 22, 2025.*

9.2.1 Non-Stormwater Discharges

This certification is based on the factors listed below, which constitute the "Certification of Non-Stormwater Discharge" required under Section 4.3.2.9.b of the NPDES IGP, version effective October 1, 2025.

1. Base maps referenced on Site Map (**Figure 2**). Only outdoor exposures related to Har-Conn's industrial activity are depicted.
2. Outdoor inspections of the facility were conducted by Laurel Pickard, Senior Project Engineer under my supervision on October 22, 2025, prior to start of facility operations with the NPDES IGP, version effective October 1, 2025
3. The "site" as mentioned in the below statement refers to Har-Conn industrial activity and does not include outdoor exposures, activity or property owned by others.
4. All discharges from Har-Conn either only consist of stormwater or non-stormwater that is authorized under a valid permit issued pursuant to Section 22a-430 or 22a-430b of the RCSA (including this general permit) or stormwater combined with other non-stormwater discharges specifically authorized by this permit.
5. Other potential connections to the stormwater conveyance system by other tenants, neighbors, or from other portions of the facility that are unrelated to Har-Conn's industrial activity were not reviewed.

I certify that in my professional judgment, the stormwater discharge from the site or facility known as Har-Conn Chrome Company 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 Regulations of Connecticut 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. 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 onsite 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 Regulations of Connecticut State Agencies, pursuant to section 53a-157b of the Regulations of Connecticut State Agencies, and in accordance with any other applicable statute.

Thomas Battles

3/6/2026

Certifier Signature

Date

Thomas R. Battles, P.E.

Certifier Name

Engineering Practice Leader, HRP Associates, Inc.

Certifier Title

Har-Conn Chrome Company

Site/Facility Name

General Permit No.

603 New Park Avenue, West Hartford, CT

Site/Facility Address

9.2.2 Certification that the Stormwater Pollution Prevention Plan 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 Har-Conn Chrome Company. 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 Regulations of Connecticut State Agencies, pursuant to section 53a-157b of the Regulations of Connecticut State Agencies, and in accordance with any other applicable statute.

Har-Conn Chrome Company

Site/Facility Name

General Permit No.

603 New Park Avenue, West Hartford, CT

Site/Facility Address

Thomas Battles

3/6/2026

Signature

Date

Name: Thomas R. Battles, P.E.

Title: Engineering Practice Leader

Address: HRP Associates, Inc.

197 Scott Swamp Road

Farmington, CT 06032

Registration Number: 15472

