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STORMWATER POLLUTION PREVENTION PLAN
Permit No: CTR050000

Ashcroft, Inc.
250 Main Street
Stratford, Connecticut 06614
(203) 378-8281

ISSUED: March 2026
File No. 05.0047407.05

PREPARED BY:

GZA GeoEnvironmental, Inc.
95 Glastonbury Boulevard, 3rd Floor
Glastonbury, CT
(860) 286-8900

www.gza.com

Version	Date	Prepared by
2026-01	**03/ 20 / 2026**	**GZA GeoEnvironmental, Inc.**
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	__ __/ __ __/ __ __ __ __	

Emergency Numbers:

General Emergency (Fire/Police/Ambulance)	911
Stratford Police Department	911 or (203) 385-4100
Stratford Fire Department	911 or (203) 385-4070
Stratford Fire Chief	(203) 385-4071
Stratford Fire Marshall	(203) 385-4073
Bridgeport Hospital Emergency Department	(203) 384-3566

Facility Personnel:

Emergency Coordinators

Primary:	EHS Manager	(203) 385-0553 (office)
Alternate 1:	Director, Order Fulfillment	(203) 385-0605 (office)

Licensed Spill Clean Up Contractor:

Clean Harbors Environmental Services, Inc. 770 Derby Avenue Seymour, CT 06483	**1-800-OIL-TANK** (1-800-645-8265) 24-hour Emergency Response (203) 734-2581

Government Agencies:

State of Connecticut Emergency Response Commission	(860) 424-3373
Stratford Emergency Management Director	(203) 385-4070
Stratford Local Emergency Planning Commission	(203)-385-4001
Stratford Sewage Treatment Plant	(203)-385-4065
CT DEEP Oil and Chemical Spills (24-hour Emergency)	(860) 424-3338
CT DEEP Bureau of Materials Management and Compliance Assurance	(860) 424-3018
CT DEEP Hazardous Waste Management	(860) 424-3023
EPA National Response Center (24-hour)	(800) 424-8802
US Coast Guard	(203) 468-4464

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1.0 CERTIFICATION STATEMENTS

1.1 CERTIFICATION BY THE PERMITTEE THAT THE SWPPP MEETS PERMIT CRITERIA

"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 this document or its attachments may be punishable as a criminal offence, in accordance with Section 22a-6, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute."			
Certifier Name:	Aimee Apatow	Certifier Title:	EHS Manager
Certifier Signature:		Date:	3-20-2026
Site/Facility Name and Address:	Ashcroft, Inc. 250 East Main Street Stratford, Connecticut 06614	General Permit No.:	GSI001880

1.2 CERTIFICATION BY A QUALIFIED PROFESSIONAL THAT THE SWPPP MEETS PERMIT CRITERIA

I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan prepared for the Site or facility known as Ashcroft, Inc. I further certify, based on such review and Site visit by myself or my agent, and on my professional judgment, that the Stormwater Pollution Prevention Plan meets the criteria set forth in the IGP 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 General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute.

Certifier Name:	Christopher Mayne	Certifier Title:	Senior Technical EHS Specialist, CHMM
Certifier Signature:		Date:	3-20-2026
Site/Facility Name and Address:	Ashcroft, Inc. 250 East Main Street Stratford, Connecticut 06614	General Permit No.:	GSI001880

1.3 CERTIFICATION OF NON-STORMWATER DISCHARGES

I certify that, in my professional judgment, the stormwater discharge from the Site or facility known as Ashcroft, Inc. consists only of stormwater, or of stormwater combined with wastewater authorized by an effective permit issued under section 22a-430 or section 22a-430b of the Connecticut General Statutes, including the provisions of the IGP 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 on-Site drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the Site. I further certify that no interior building floor drains exist unless such floor drain connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to a sanitary sewer.

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

Certifier Name:	Christopher Mayne	Certifier Title:	Senior Technical EHS Specialist, CHMM
Certifier Signature:		Date:	3-20-2026
Site/Facility Name and Address:	Ashcroft, Inc. 250 East Main Street Stratford, Connecticut 06614	General Permit No.:	GSI001880

2.0 INTRODUCTION

This Stormwater Pollution Prevention Plan addresses the operations at the Ashcroft, Inc. (Ashcroft) facility located at 250 East Main Street, Stratford, Connecticut (the "Facility"/"Site"). The Stormwater Pollution Prevention Plan (the "SWPPP"/"Plan") has been developed in accordance with the State of Connecticut Department of Energy and Environmental Protection (CTDEEP) National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Stormwater Associated with Industrial Activities ("Industrial General Permit"/General Permit"), effective October 1, 2025[1]. This Plan describes the Facility and its operations and identifies potential sources of stormwater pollution at the Facility. Good engineering practices and industry standards have been considered in developing control measures to minimize the potential for discharge of pollutants from the Facility and procedures for the effective implementation of the Industrial General Permit requirements.

As required by subsection 4.3.2.9 of the General Permit, this Plan has been reviewed by an authorized representative of Ashcroft and by a Qualified Professional representing GZA GeoEnvironmental, Inc. (GZA). Additionally, these representatives are responsible for review of the General Permit, all registration information, applicable plans and specifications, and any CTDEEP approvals regarding this SWPPP plan. Certification statements are provided in Section 1. Any significant changes to the Site or to this Plan will require recertification.

This Plan supersedes Ashcroft's previous SWPPP released in 11-2024 and is available on Site for review by Facility personnel and representatives of the CTDEEP or the Town of Stratford municipal stormwater management agency. In accordance with subsection 4.3.1.3 of the General Permit, this Plan will be updated throughout the term of the Facility's permit coverage "with information including, but not limited to, revisions and improvements to the 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." Whenever a corrective action results in a change to any of the documented controls or procedures, this Plan must be modified "within fourteen (14) calendar days of completing the corrective action work."

The CTDEEP issued the original General Permit for the Discharge of Stormwater Associated with Industrial Activities on October 1, 1992. In June 2011, Ashcroft submitted a registration application under the General Permit, effective October 1, 2011; coverage was issued under Permit Number GSI001880. A record of registration and coverage are included in **Attachment A**. The General Permit was reissued without modification between 2015 and 2021 and the General Permit issued on October 1, 2021, expired on September 30, 2025. A copy of the new General Permit, effective October 1, 2025 through October 1, 2030 is included in this plan as **Attachment M**.

As an existing permittee, with industrial activity authorized for discharge under the previous general permit (issued on October 1, 2021) Ashcroft plans to submit a registration under the new Industrial General Permit (IGP) no later than April 1, 2026 (within 180 days after CTDEEP's Issue Date of 10/1/2025). In addition, as required by section 4.2.16.2 of the new General Permit, Ashcroft will also "post a sign of permit coverage at a safe, publicly accessible location in close proximity to the industrial Site that, at a minimum, meets the requirements in section 4.2.16.3 no later than April 1, 2026".

3.0 RECORD RETENTION

As required by subsection 4.8.3 of the General Permit, Ashcroft will retain copies of the following records "for a period of at least five (5) years from the date that coverage under this permit expires or is terminated."

[1] 2025-Industrial-Sormwater-General-Permit.pdf

- permit registration documents;
- records of all data used to complete the registration;
- the SWPPP, and subsequent modifications;
- all reports and certifications required by the permit;
- monitoring records and data;
- documentation of inspections, maintenance, monitoring, and corrective actions;
- notifications of all other instances of noncompliance not included in the Annual Report;
- an electronic record of employee training, including the training agenda, the date(s), name(s) and employee responsibilities;
- additional information promptly submitted to CTDEEP should Ashcroft discover that facts or information submitted in the registration or in any report was not complete or accurate; and
- any advance notice given to CTDEEP, as required, of any planned changes to the facility or activities which may result in noncompliance with permit requirements or cause a significant increase in the quantity of pollutants discharged.

4.0 FACILITY/SITE DESCRIPTION AND CONTACT INFORMATION

A description of the Facility, on-site industrial activities, and contact information is provided in the following sections.

4.1 CONTACT INFORMATION FOR RESPONSIBLE PARTIES

Facility Operator(s):
Name: Ashcroft, Inc.
Address: 250 East Main Street
City, State, Zip Code: Stratford, Connecticut 06614
Name: VP GM North America
Telephone Number: (203) 378-8281
Email address: ashcroftehs@ashcroft.com

Facility Owners(s) if different than operator:
Name: Same as Operator

Site Contact if different than operator:
Name:EHS Manager
Address: 250 East Main Street
City, State, Zip Code: Stratford, Connecticut 06614
Telephone Number: (203) 385-0553
Email address: :ashcroftehs@ashcroft.com

SWPPP Contact(s):
SWPPP Contact Name (Primary):EHS Manager
Telephone Number: (203) 385-0553
Email address: ashcroftehs@ashcroft.com
SWPPP Contact Name (Backup): EHS Specialist
Telephone Number (203) 385-0553
Email address: ashcroftehs@ashcroft.com

4.2 FACILITY/SITE DESCRIPTION

The property located at 250 East Main Street in Stratford, Connecticut comprises approximately 31.5 acres. A Site Location Map is provided as **Figure 1 in Attachment B**. The layout of the Site is depicted on **Figure 2 in Attachment C**; approximate latitude/longitude for each stormwater discharge point is provided.

The facility manufactures pressure and temperature instruments including mechanical gauges, digital indicators, transducers/transmitters, portable handheld calibrators, switches, laboratory instrumentation, test equipment and media isolation devices. Raw materials used in these processes include stainless steel, brass, steel, plastic, glass, acids, caustics, oil, and solvents.

Facility Address	
Ashcroft, Inc. 250 East Main Street Stratford, CT 06614	
Principle Contacts / Facility Operations	
VP GM North America Work: (203) 378-8281	EHS Manager Work: (203) 385-0553
EHS Specialist Work: (203) 385-0553	Facility Manager Work: (203) 385-0432
Shipping/Receiving Manager Work: (203) 385-0329	
General Information	
SIC Code: 3829 Coordinates: Latitude: 41° 12' 21.72" N Longitude: - 73° 06' 58.05" W	Descriptive Location: Facility is located on East Main Street, just East of Interstate 95 exit 33. The Ashcroft property is adjacent to the Moses Wheeler Bridge and the lower Housatonic River.

Facility SIC and NAICS Code classifications are specified under Sector AC in Appendix A of the General Permit.

Primary regulated industrial sector and its description: Sector AC-Electronic, Electrical, Photographic and Optical Goods
Primary four-digit Standard Industrial Classification (SIC) code and its description: 3829 - Measuring and Controlling Devices, Not Elsewhere Classified
Primary six-digit North American Industry Classification System NAICS code and its description: 334519 - Other Measuring and Controlling Device Manufacturing
Co-located / Secondary Industrial Activity(s) SIC code(s), NAICS code(s), Sector(s) and Subsector(s): SIC Code 3823, Industrial Instruments for Measurement, Display, and Control of Process Variables and Related Products NAICS Code 334513, Instruments and Related Products Manufacturing for Measuring, Displaying, and Controlling Industrial Process Variable

Industrial manufacturing activities take place within the 325,000 square-foot main building located in an industrial section of town. The Northeast portion of the property is undeveloped, consisting of a large bedrock formation, wetlands, trees and other natural vegetation. The Facility is not located within, or in proximity to an aquifer protection area.[2]

[2] Source: GIS Open Data Aquifer Protection Areas Set, 3/25/2025, CTDEEP

4.3 STORMWATER COLLECTION AND CONVEYANCE SYSTEM

Areas on the property subject to industrial activity are impervious. GZA observed that the stormwater collection and conveyance system primarily consists of catch basins along the impervious portions of the Site and building roof drains which are piped into the underground stormwater sewer system.

4.4 SURFACE DRAINAGE AND RUNOFF

Surface runoff and drainage at the Site is depicted on **Figure 2**. The approximate surface drainage area associated with Outfall 001 is approximately 17.8 acres, nearly 51% of the total site acreage.

The stormwater system at the Ashcroft facility has been designed to direct the flow of stormwater through a series of catch basins to the discharge location at a conveyance channel which flows northeast to the lower estuary of the Housatonic River. All stormwater generated at the Site is directed to Outfall 001 and therefore, the Site is considered to be located in one Drainage Area.

The Facility is located within the Connecticut Housatonic Main Stem Regional Drainage Basin in the Housatonic River Subregion and is assigned Local Basin No. 6000-00[3]. Stormwater discharge from the Site, located within the coastal boundary[4], combines with stormwater drainage from the City of Stratford prior to discharge into a conveyance channel which flows northeast to the lower estuary of the Housatonic River (CT-C1_020-SB).

The annual precipitation data for the most current 30-year period (1991-2020) provided by the U.S. National Oceanic and Atmospheric Administration (NOAA) National Center for Environmental Information (NCEI) indicates that the average annual precipitation information used to calculate the estimated gallons of annual stormwater runoff in each drainage area corresponds with the 30 Year NOAA normal average (42 inches).

The runoff coefficient used is 0.85 which is broadly accepted for use in composite runoff analysis for impervious areas, such as streets, rooftops, asphalt drives and parking lots for storms of 2-year to 10-year frequencies.

DRAINAGE AREA CHARACTERISTIC	SPECIFICATIONS
Total area	31.5 acres (1,528,956 square feet)
Pervious surface (e.g., grass)	753,588 square feet
Impervious surface (e.g., roof or paved)	775,868 square feet
Percentage of parcel that is pervious	49%
Percentage of parcel that is impervious	51%
Drainage Area 001	1,528,956 square feet

SAMPLING ID	LATITUDE / LONGITUDE	REPRESENTATIVE AREA	MONITORING DETAIL
Outfall-001	41.2060, -73.1161	Entire Drainage Area	Representative of all industrial activity on the property

[3] Source: GIS Open Data Local Drainage Basin Set, 7/3/2023, CTDEEP

[4] Source: GIS Open Data Coastal Boundary Map Set, 7/3/2023, CTDEEP

Approximately 49% of the property (753,588 sq ft) is pervious surface area. There are large grassy areas and forested areas on the sides of the Facility and large forested areas in the eastern side of the property. There are also several vegetated islands in the employee parking lots. Approximately 51% of the property (775,868 sq ft) is impervious surface area. Using a runoff coefficient of 0.85, an average annual precipitation of 42 inches (3.5 ft), and 7.48 gal/ft3, the estimated annual runoff associated with industrial activity to Outfall 001 would be 17,265,391 gallons per year. The entire property contributes 34,023,858 gallons per year to the Housatonic River.

SOUTHERN DRAINAGE AREA INDUSTRIAL ACTIVITY	DETAILS
Area associated with industrial activity (approximate)	775,868 square feet
Runoff coefficient	0.85
Average annual precipitation	42 inches
Estimated annual runoff associated with Industrial Activity	17,265,391 gallons per year
Estimated annual runoff for Total Drainage Area	34,023,858 gallons per year

4.5 WATER QUALITY CLASSIFICATION

The surface water body that receives stormwater from the Site is the lower estuary of the Housatonic River (CT-C1_020-SB). This section of the Housatonic River, which flows into Long Island Sound, is not listed as an Impaired Waterbody by the State of Connecticut, and therefore, no additional parameters are required to be sampled for impairments.

Stormwater runoff from the Facility has been evaluated for consistency with the applicable goals and policies set forth in the Connecticut Coastal Management Act Section 22a-92. The Facility is located within the Coastal Boundary of Connecticut. However, there have not been any changes to the Facility footprint since the last permit renewal.

According to the CTDEEP Aquifer Protection Area (APA) maps, Stratford and thus the Facility are not located within a designated APA.

According to the State of Connecticut's Commission on Culture & Tourism Historic Preservation & Museum Division and the National Register of Historic Places, there are no state or federal historic places located in the area that would be affected by stormwater run-off from the Facility.

The stormwater runoff has also been evaluated for consistency with the applicable goals and policies set forth in the Connecticut Endangered and Threatened Species Program, Section 22a-306 of the Connecticut General Statutes. The Facility property is located within a State and/or Federal Listed Species and Significant Natural Community area according to the latest CTDEEP Natural Diversity Database Areas dated December 2025. Such activity does not threaten the continued existence of any species listed as endangered or threatened pursuant to Section 26-306 of the Conn. Gen, Stat., and will not result in the destruction or adverse modification of habitat designated as essential to such species.

The stormwater from the Facility is not discharged to a Publicly Owned Treatment Works (POTW) or entirely to groundwater.

The Housatonic River is classified as SB water. Groundwater at the Site is classified as "GB". Class GB designated uses are "industrial process water and cooling waters and baseflow for hydraulically-connected waterbodies and is presumed not suitable for human consumption without treatment". [5]

Instructions: Permittees must use the Water Quality Classification Maps relevant to the Connecticut Water Quality Standards to determine the class assigned to each surface water and groundwater resource to which they discharge: https://portal.ct.gov/DEEP/Water/Water-Quality/Water-Quality-Classification-Maps
Identify the water classification for each surface water in which stormwater discharge from the site reaches: **Drainage Basin Number 6000-00 (Housatonic River), ID CT-C1_020-SB – Lower Housatonic River is not considered impaired.**
Does the site discharge within 500 feet of a tidal wetland? ☒ Yes ☐ No
Does the facility have new or increased discharges to High Quality Waters *(see definition in RCSA* 22a-426-1*)?* ☐ Yes ☒ No
If yes, you must document compliance with the Connecticut Antidegradation Implementation Policy in the Water Quality Standards, as amended, on or before thirty (30) days prior to the commencement of a new or increased discharge to High Quality Waters from the industrial activity. At a minimum, the permittee shall identify the control measures it will implement to prevent the discharge of the Water Quality Volume to a surface water body. Does not apply
If yes, which parameters and sample frequency apply? Does not apply

4.6 CONSISTENCY WITH OTHER PLANS AND PERMITS

The EPA and CT DEEP National Pollutant Discharge Elimination System (NPDES) permit programs regulate point sources that discharge pollutants to waters of the state. The Facility is subject to the Metal Finishing Effluent Guidelines and point source discharges are regulated under Permit No. CTSIU0078.

In addition, The Facility is registered as a large quantity generator (LQG) of hazardous waste (RCRA ID# CTD001840974).

Ashcroft maintains the following plans in accordance with applicable regulations:

- Spill Prevention Control and Countermeasure (SPCC) Plan
- Emergency Response and Hazardous Waste Contingency Plan

Relevant sections of these documents may be referenced in this Plan and are maintained readily accessible on-site.

[5] Source: Stratford, Connecticut Water Quality Classifications Map, October2018, CTDEEP

4.7 NON-STORMWATER DISCHARGE EVALUATION

The General Permit authorizes the following non-stormwater discharges associated with industrial activities, which may occur at the Facility, provided they do not contribute to a violation of water quality standards:

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

Section 4.3.2.4 of the General Permit requires that an evaluation for the presence of any unauthorized non-stormwater discharges be documented. For any unauthorized discharges identified, immediate action must be taken to permit or eliminate those discharges.

Ashcroft review of stormwater discharges from the Site and GZA's observations during a site evaluation on September 6, 2025, did not identify the presence of unauthorized non-stormwater discharges. A non-stormwater discharge certification is included in Section 1.3 of this Plan.

Date of Evaluation: 9/6/2025
Description of Evaluation Criteria Used: Dry weather assessment for evidence of non-stormwater discharges in storm drainage system
List of Discharge Points or Onsite Drainage Points Directly Observed During the Evaluation: Outfall 001 and select catch basins
List of Actions Taken to Address any Unauthorized Non-Stormwater Discharges: N/A
Other Relevant Documentation N/A

5.0 POLLUTION PREVENTION TEAM

A Pollution Prevention Team (the "PPT") has been established to ensure that this Plan is fully executed and Ashcroft objectives are met. Team members are responsible for implementing, executing, and maintaining all elements of the SWPPP to ensure that the processes and procedures developed to meet the conditions of the General Permit are effective in minimizing the potential for discharge of pollutants from the Site.

Team members provide oversight of materials management and site activities, assess the effectiveness of control measures, and initiate corrective action when required; responsibilities are outlined in **Attachment D.**

At least one team member is available on site at the Facility or on call during each operational shift.

6.0 WATER QUALITY MONITORING PROGRAM

The Monitoring Program established for stormwater discharge from the Site is detailed in the following sections.

Analytical test results for stormwater discharge samples collected during the previous permit term are summarized in **Attachment E**. These results indicate that the exemption criteria for all benchmark monitoring parameters for Outfall 001 were met following the sampling event on August 13, 2013. Collection of samples for fecal coliform testing continues to be performed on an annual basis.

Samples collected at a quarterly frequency for the five-year period prior to the issuance of this Plan revision were assessed by Ashcroft for the following water quality characteristics: Color, Odor, Clarity, Floating Solids, Settled Solids, Foam, Oil Sheen, or Other obvious indicators of stormwater pollution. No indication of pollutants in the stormwater discharge samples taken at Outfall 001 was identified. Assessment forms completed each quarter during calendar years 2020 – 2025 are available on-site.

6.1 DISCHARGE POINT

Information regarding surface drainage areas and discharge points associated with industrial activities observed by GZA in September 2025 was provided in Ashcroft's previous SWPPP.

DISCHARGE SERIAL NUMBER (DSN)	**001**
DRAINAGE AREA Associated with Industrial Activity	17.8 acres (775,368 sq ft)
LAND USE DESCRIPTION[6] **RUNOFF COEFFICIENT ESTIMATE**	Light Industrial 0.50 – 0.80
SURFACE TYPE[7] **RUNOFF COEFFICIENT ESTIMATE**	Unimproved Areas 0.10 – 0.30
SURFACE TYPE[7] **RUNOFF COEFFICIENT ESTIMATE**	Asphalt/Drives and Walks/Roofs 0.70 – 0.95

Instructions: For each outfall, the permittee must provide the following information:	
Outfall Identifier:	Outfall-001
Type(s) of monitoring performed:	Quarterly Visual and Semi-annual sampling for laboratory analyses
Locations where samples are collected:	Discharge point into the conveyance channel to the lower Housatonic River
Select the type of conveyance, outfall, or channelized flow:	☐ Pipe ☐ Catch Basin ☒ Swale
	☐ Other: Click or tap here to enter text.
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)	☐ Yes ☒ No
To what system or receiving water does your stormwater runoff discharge?	☐ Storm Sewer System (MS4) ☐ Wetlands

[6] Source: ConnDOT Drainage Manual, Table 6.4 Coefficients for Composite Runoff Analysis, December 2003

[7] Source: ConnDOT Drainage Manual, Table 6.5 Coefficients for Composite Runoff Analysis, December 2003

If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☒ Waterbody	
If selected Separate Storm Sewer System above, name the system:	Click or tap here to enter text.	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:	Drainage Basin Number 6000-00 (Lower Housatonic River), conveyance flows into the Housatonic River, ID CT-C1-020-SB – Class SB	
Is receiving water impaired?	☐ Yes	☒ No
If yes, what is the impairment(s)?	NA	
Has a Total Maximum Daily Load (TMDL) been approved for any of the identified pollutants? If yes, please answer the below questions.	☐ Yes	☒ No
If yes, what is the name of the TMDL?	NA	
Identify the pollutant(s) causing the impairment(s):	NA	
Provide sampling frequency for Impairments, if applicable	NA	

6.1.1 Changes or Additions to Discharge Point

As required by the General Permit, Ashcroft will notify CT DEEP of any changes to the number or location of discharge points at the Site, and this Plan will be updated for re-certification.

6.2 SAMPLE COLLECTION PROCEDURES

The General Permit requires that all samples be collected from discharges resulting from a storm event that occurs at least 72 hours (three days) after any previous storm event generating a stormwater discharge. Typically, all discharge samples at the Site are taken during the same storm event. If it snows at least once during the period from January 1 to March 31, or from October 1 to December 31, at least one quarterly assessment sampling event will be scheduled to capture snowmelt discharge, if feasible. Any sample containing snow or ice melt must be identified on the sampling record.

Individual grab samples, collected from each stormwater discharge point for all required monitoring, should begin during the first thirty (30) minutes of flow at each sampling location and completed as quickly as possible. Ashcroft's monitoring program requires that, if it is not possible to collect the sample within the first thirty (30) minutes of a qualifying storm event, the sample should be collected as soon as possible and the documented reason for the delay will be retained as required in Section 3 of this Plan.

6.2.1 Exceptions to Sample Collection for Visual Assessment

When adverse weather conditions prevent the collection of stormwater discharge samples for visual assessments during any quarter, Ashcroft will schedule the collection of a substitute sample during the next qualifying storm event. The reason for not performing visual assessments during the quarter will be documented on the form provided in **Attachment H.**

6.2.2 Inability to Collect Samples

Conditions which may result in the inability to collect samples, provided as examples in the General Permit, include the following:

- the absence of a 72-hour (3-day) period of dry weather
- the absence of a rain event that produces a stormwater discharge
- the timing of a rain event prevents laboratory analysis within the maximum allowed sample hold time
- the absence of a discharge from a detention or retention basin
- adverse weather conditions preventing access to a stormwater discharge location such as: extended frozen conditions, local flooding, high winds, or electrical storms

6.3 SAMPLE COLLECTION RECORDS

For each measurement or sample taken under Ashcroft's monitoring program, records of the following information is maintained:

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

For each stormwater discharge sample collected, the following information should also be recorded[8]:

- the sample/discharge point identifier
- the duration between the storm event you sampled and the end of the previous storm event that resulted in a discharge of stormwater from your site (i.e., a "measurable storm event").
- the date and duration of the storm event sampled.
- rainfall measurement or estimate (in inches).

[8] Industrial Stormwater Monitoring and Sampling Guide, EPA 832-B-09-003, April 2021

- estimate of the total volume of the discharge sampled from the discharge point.
- sample type

Sample collection records will be retained electronically with laboratory test reports on the Ashcroft intranet site as in accordance with Section 3 of this Plan.

6.4 BENCHMARK MONITORING

Benchmark monitoring is the method used to evaluate the overall effectiveness of the Facility's stormwater control measures in meeting the benchmark thresholds established in the General Permit. The first monitoring period under the new General Permit, effective October 1, 2025, begins on January 1, 2026. If the five-year permit is administratively continued, all monitoring requirements remain in effect at their original (i.e., year 1) frequency for existing permittees.

Benchmark monitoring requirements for Sector AC permittees, specified in Table AC of the General Permit, are provided below. The monitoring, inspection, and reporting schedule provided in **Attachment J** includes the semiannual collection of samples from the discharge point described in Section 6.1 above for analysis of the parameters listed in the table. The IGP requires that semi-annual monitoring events be separated by at least 30 days.

The two (2) semiannual monitoring periods are:

- January 1 to June 30; and
- July 1 to December 31

The benchmark thresholds listed below are not effluent limitations and exceedance of a threshold is not a permit violation. However, if an exceedance of a benchmark threshold triggers Corrective Actions, failure to take the required measures is a permit violation.

BENCHMARK MONITORING TABLE for SECTOR AC

MONITORING TYPE	SCHEDULE / FREQUENCY	DURATION	PARAMETER [a]	THRESHOLD
Benchmark Monitoring	Semiannually	Until Exemption Criteria are Met[b]	Chemical Oxygen Demand (COD)	75 mg/L
			Total Oil and Grease (O&G)	5.0 mg/L
			pH	5.0 - 9.0 s.u.
			Total Suspended Solids (TSS)	90 mg/L
			Total Phosphorus (TP)	0.40 mg/L
			Total Kjeldahl Nitrogen (TKN)	2.30 mg/L
			Nitrate as Nitrogen (NO3-N)	1.10 mg/L
			Total Copper (Cu)	0.059 mg/L
			Total Lead (Pb)	0.076 mg/L
			Total Zinc (Zn)	0.160 mg/L
Additional Monitoring	Not Applicable	No additional monitoring for Sector AC		
Effluent Limits	Not Applicable	No effluent limits for Sector AC		
Aquatic Toxicity	Year 1 of Permit Coverage[c]	One time during the 5-year permit term	LC50 for Daphnia pulex	None
Impaired Waters[d]	Does not Apply			

[a] For metal parameters, analyses are for Total Recoverable Metal as defined in 40 CFR 136.
[b] The permit provides benchmark exemptions for a maximum of 2 years at a time. An exemption for sample pH cannot be earned until exemptions for all other parameters are met.
[c] Aquatic toxicity sampling and testing must be performed in the first year of the permit term, during a regularly scheduled semiannual sample.
[d] Refer to the Connecticut DEEP Water Quality Plans and Assessment Map to determine impairment status and relevant Total Maximum Daily Loads (TMDLs) of receiving water.

6.4.1 Monitoring Discharges to Impaired Waters

The surface water body that receives stormwater from the Site is the Housatonic River. The local basin that has been identified for this discharge is the lower estuary of the Housatonic River (CT-C1_020-SB). As indicated in Section 4.2, this section of the Housatonic River is not listed as an Impaired Waterbody by the State of Connecticut. No additional monitoring is required for discharging into impaired waters.

6.4.2 Method of Analysis

The General Permit specifies the laboratory methods which must be used for all testing performed. Ashcroft's monitoring program requires contracted service providers to perform benchmark monitoring according to methods prescribed in Title 40, Code of Federal Regulations (CFR) Part 136, or an approved alternative method.

Note that, for accuracy, analysis of pH (hydrogen ion) within 15 minutes of collection is included in 40 CFR Part 136 Table II: Required Containers, Preservation Techniques, and Holding Times.

A copy of each laboratory test report will be retained electronically on the company intranet site with this Plan.

6.4.3 Data Reporting

The monitoring, inspection, and reporting schedule provided in **Attachment J** requires the submittal of Discharge Monitoring Reports (DMRs) to CT DEEP within 30 days after the end of each monitoring period until exemptions for all monitoring parameters are met. For samples collected from January 1 to June 30, the DMR is due no later than July 30th. The DMR for samples collected from July 1 to December 31 must be submitted no later than January 30th. A copy of each report, signed by a person described in Section 5.21 of the General Permit, will be retained with records of sampling and analysis on the company intranet site with this Plan for a minimum period of five (5) years.

The General Permit takes into consideration both the method detection limits and laboratory reporting levels in determining the test result values to enter on a DMR. Specifically, under subsection 4.5.1.5, "if laboratory data for a given parameter is less than the method detection limit, the permittee may report half the value of the detection limit". "If laboratory data for a given parameter is between the method detection level and the reporting level (i.e., a confirmed detection but below the level that can be reliably quantified), the permittee may report half the value of the reporting level of the analyzing laboratory."

If no discharge occurs during a monitoring period, Ashcroft will the enter the appropriate No Data Indicator ("NODI") code on the DMR. Once the Facility has qualified for a benchmark monitoring exemption, the appropriate No Data Indicator Code (NODI) will be reported. A list of NODI codes, included as Appendix L in the General Permit, is provided in **Attachment F** of this Plan.

Section 6.4.4 of this Plan provides information on when to discontinue monitoring and data reporting.

Should monitoring data or other information indicate an increased potential for pollutants to be conveyed in stormwater discharge, Ashcroft policy requires that additional control measures be evaluated.

6.4.4 Benchmark Monitoring Exemptions

The General Permit provides for temporary benchmark monitoring exemptions for a maximum period of 2 years at a time; permittees are then required to resume routine monitoring as described in Section 6.4 of this Plan.

If the average of four (4) consecutive measurements for a parameter does not exceed the benchmark threshold, a permittee earns the temporary monitoring exemption provided in subsection 4.5.1.5 of the General Permit and can discontinue monitoring and reporting for that parameter for a maximum of 2 years. Monitoring and reporting for all other parameters must continue until the exemption criteria are met and an exemption for sample pH cannot be earned until exemptions for all other parameters are met.

The General Permit also provides for exemptions from benchmark monitoring, impaired waters monitoring, and corrective action "if an exceedance for a benchmark threshold is attributable solely to the presence of that pollutant in run-on entering from off-site. The Permittee must have evidence and analytical data to support such claim."

Appendix H of the General Permit provides a decision-making flowchart for determining when sampling is complete and Ashcroft can discontinue monitoring and reporting for a Sector AC parameter. A copy of this flow chart is provided in **Attachment F** of this Plan.

CT DEEP must be notified, by email, of the following changes to monitoring frequency; refer to the monitoring, inspection, and reporting schedule provided in **Attachment J**:

- 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 due to acceptance by CT DEEP of a Facility's claim 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.

If the five-year permit is administratively continued, under Section 4.5 of the General Permit, existing permittees cannot obtain benchmark exemptions during this period.

6.4.5 Exceedances of Benchmark Thresholds

Exceedance of a benchmark threshold indicates that additional action(s) may be necessary to protect water quality. Corrective actions after a benchmark exceedance occur only if the following are true:

- The average value of four consecutive semiannual samples for a parameter exceeds the benchmark threshold for that parameter; or
- Fewer than four semiannual samples are collected, but a single sample or the sum of samples exceeds the benchmark threshold by more than four times that parameter's threshold (i.e., the measured value is mathematically certain to exceed the four-event average). If benchmarks thresholds are exceeded according to the above criteria, corrective action is required.

6.4.6 Corrective Action Based on Benchmark Exceedances

Appendix H of the General Permit provides guidance for determining whether a corrective action is needed after a benchmark exceedance; a copy is included in **Attachment F**. **Note that failure to take corrective action measures is a permit violation**.

- A summary of conditions triggering corrective actions is also included in Table 9 of the General Permit; for Sector AC permittees a corrective action is triggered when:
    - The average value of four consecutive semiannual samples for a parameter exceeds the benchmark threshold for that parameter; or
    - Fewer than four semiannual samples are collected, but a single sample or the sum of samples exceeds the benchmark threshold by more than four times that parameter's threshold (i.e., the measured value is mathematically certain to exceed the four-event average).

Ashcroft policy requires that a triggering condition requiring corrective action, listed in Table 9 of the IGP, will be documented and filed in the SWPPP within 24 hours of discovery as required by subsection 4.6.5 of the General Permit. Should adverse conditions cause a delay, the documentation will be filed as soon as possible and the reason noted.

A schedule for corrective actions is outlined in Section 4.6.1 of the General Permit and levels for Corrective Action Measures (CAMs) are outlined in Section 4.6.2. Specific guidance for benchmark exceedances is noted in Section 4.6.3.1. Appendix G of the General Permit, included in **Attachment L**, summarizes this information.

Ashcroft policy requires the documentation of corrective action measures in accordance with the schedule outlined in Section 4.6.1 of the General Permit using the Corrective Action Measure Requirements & Waiver Request form provided. This form may also be submitted to CT DEEP to request:

- an extension to timelines for implementing corrective action measures; or
- a waiver from further corrective action measures and/or monitoring.

Documentation of corrective action measures will be retained on the company intranet site as required in Section 3 of this Plan.

6.4.6.1 Exception to Corrective Action

Permittees are not required to perform corrective action if an exceedance of a benchmark is "attributable solely to the presence of that pollutant in run-on entering from off-site. Run-on entering from legacy activity or pollution" at the Site is not eligible for exemption. The conditions included in the General Permit which must be met are as follows:

- "The statistical average concentration of the benchmark monitoring results is less than or equal to the pollutant concentration in run-on entering from off-site."
- "This includes changes in pH due to rainfall. In such a case, the permittee may collect rainfall samples at representative locations and submit the data to the Commissioner for review."
- "The permittee documents and maintains with the SWPPP the supporting rationale for concluding that

benchmark exceedances are in fact attributable solely to "run-on" entering from off-site, including any supporting rationale, and any data previously collected by them or others."

- "The permittee demonstrates that the diversion of off-site run-on containing these pollutant levels is infeasible through engineering analysis."

- "The permittee notifies the Commissioner of the findings, and the Commissioner issues a written affirmative determination of the permittee's documentation demonstrating that the benchmark exceedances are attributable solely off-site pollutant levels."

6.4.7 Corrective Action Schedule

Ashcroft follows the corrective action schedule outlined in Section 4.6.1 of the General Permit and Section 4 of the Corrective Action Measure (CAM) Requirements & Waiver Request form. If a CAM is triggered, the following timeframes apply:

- Immediate Actions (Within 1-2 Days): "All reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational" will be taken immediately.
- Subsequent Actions (Within 14-60 Days): If additional actions are required, they "will be completed before the next storm event, if possible, and within fourteen (14) calendar days from the time of discovery of the corrective action condition. If it is infeasible to complete the corrective action within fourteen (14) calendar days", the reason for the delay and a schedule for completing the work will be documented.
- Extension (Greater than 60 Days): If the corrective action will not be completed within the 60-day timeframe, the reason for the delay and a schedule for completing the work will be documented. Refer to the Corrective Action Measure Requirements & Waiver Request form included in **Attachment L**.
    - "Where corrective actions result in changes to any of the controls or procedures documented in this SWPPP, an update is required "within fourteen (14) calendar days of completing corrective action work".
    - "If a Level 3 CAM is triggered and a structural control measure is needed, the operator may take up to one-hundred and twenty (120) days to install such measures. If installation exceeds one-hundred and twenty (120) days, the permittee must obtain an extension."
- Follow-Up Sampling (An additional 30 calendar days, or until the next qualifying storm event, should none occur within 30 calendar days after implementing a CAM): "For those corrective action triggering conditions that require or recommend follow-up sampling, once sampling results are received, the permittees must report results by email to DEEP.StormwaterIndustrial@ct.gov within 30 days."
    - Reporting Requirements: "If the follow-up monitoring is within the same semi-annual period (or quarterly period, as applicable) as the initial value, only the maximum measurement taken during that semi-annual monitoring period must be reported as an attachment to the DMR as the value for a given benchmark parameter. If the follow-up monitoring sample is collected in the subsequent semiannual period (or quarterly period, as applicable), the permittee may use the follow-up measurement as the value for that semi-annual period. Only the value reported on the DMR can be used to calculate the four (4) event average for a benchmark threshold parameter. The permittee must also report results of follow-up sampling by email to DEEP.StormwaterIndustrial@ct.gov within

thirty (30) days of receipt."

- Continuation of Semi-Annual Monitoring: "The permittee must continue to monitor semiannually (or quarterly, if applicable) until the results of the discharge are in compliance with the benchmark threshold 4-event average, or until the Commissioner waives the requirement for additional monitoring."

6.5 TOXICITY TESTING

The Toxicity Testing requirement and frequency for Sector AC permittees, specified in Table AC of the General Permit, is provided in Section 6.4 of this Plan. The samples is collected from Outfall 001 during a regularly scheduled semiannual benchmark sampling event during the first year of the permit term. Test results are reported on the semi-annual DMR submission. The General Permit does not provide an exemption for toxicity testing.

The General Permit specifies the laboratory methods which must be used for all testing performed. "Acute toxicity biomonitoring tests shall be conducted according to the procedures specified in Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, 5th edition (EPA 821-R-02-012). The following specific conditions apply:

- For freshwater discharges, for 48 hours utilizing neonatal Daphnia pulex (less than 24 hours old).

If laboratory test results show that toxicity has occurred, Ashcroft will evaluate stormwater control measures. CT DEEP will inform the permittee whether any additional measures are necessary based on the results of aquatic toxicity testing.

6.6 VISUAL ASSESSMENTS OF WATER QUALITY

Observing stormwater discharge is the method used to identify the presence of potential pollutants. The first monitoring period under the new General Permit, effective October 1, 2025, begins on January 1, 2026, and continues for the entire term of the permit.

The monitoring, inspection, and reporting schedule provided in **Attachment J** includes the quarterly collection of samples from the one (1) discharge point described in Section 6.1 above for assessment. The four (4) quarterly monitoring periods run from January 1 to March 31, April 1 to June 30, July 1 to September 30, and October 1 to December 31.

If the five-year permit is administratively continued, all monitoring requirements remain in effect.

6.6.1 Assessment Method

Each stormwater discharge sample collected following procedures included in Section 6.2 will be assessed "in a clean, colorless glass or plastic container" and examined in a well-lit area as soon as possible after collection as required under subsection 4.4.2.3 of the IGP. If it snows at least once over a period of four quarters, at least one assessment sampling event must capture snowmelt discharge, if feasible.

Each sample, collected following the sampling procedures in Section 6.2, will be assessed for the following water quality characteristics:

- Color
- Odor
- Clarity (diminished)
- Floating Solids
- Settled Solids
- Foam
- Oil Sheen
- Other obvious indicators of stormwater pollution

A quarterly visual monitoring form is provided in **Attachment H.**

Should the visual assessment indicate the presence of pollutants in the stormwater discharge, Ashcroft will initiate the corrective action procedures in section 4.5.3.8 of the IGP, as outlined in Section 6.6.2 of this Plan.

6.6.2 Corrective Action for Visual Assessment

The conditions which trigger corrective actions are listed in Table 9 of the General Permit. For Sector AC permittees this includes visual observation of pollution in discharge water, indicated by color, odor, floating solids, settled solids, suspended solids, or foam. **Note that failure to take corrective action measures is a permit violation.**

Ashcroft policy requires that a triggering condition requiring corrective action, listed in Table 9 of the IGP, be documented and filed in the SWPPP within 24 hours of discovery as required by subsection 4.6.5 of the General Permit. Should adverse conditions cause a delay, the documentation will be filed as soon as possible and the reason noted. The corrective action schedule outlined in Section 6.4.6 of this Plan will be followed.

Follow-up monitoring is not required under subsection 4.6.3.8 of the General Permit "but is recommended, especially in cases where a visual assessment shows evidence of pollution in discharge water. If follow-up monitoring is conducted, the timeframe must align with the schedule outlined in subsection 4.6.1.4. Permittees are granted an additional thirty (30) calendar days (or until the next qualifying storm event, should none occur within thirty (30) calendar days) after implementing a CAM to collect the follow-up sample. If a follow-up sample is taken, the permittee must report results by email to DEEP.StormwaterIndustrial@ct.gov within thirty (30) days of receipt."

Ashcroft policy requires the documentation of corrective action measures in accordance with the schedule outlined in Section 4.6.1 of the General Permit using the Corrective Action Measure Requirements & Waiver Request form provided **in Attachment L**. This form may also be submitted to CT DEEP to request:

- an extension to timelines for implementing corrective action measures; or

- a waiver from further corrective action measures and/or monitoring.

6.7 ANNUAL REPORT

Submission of an Annual Report no later than April 15th after each calendar year is required under section 4.7.3 of the General Permit. The annual reporting requirement is included in the monitoring, inspection, and reporting schedule provided in **Attachment J**. Ashcroft will be required to provide the following information for the calendar year, at a minimum:

- Monitoring Data Summary
- Site Inspection Summary
- Routine and comprehensive facility inspections summary
- Visual Assessment documentation summary
- Corrective Action Summary and the status of any action(s) still outstanding at the time the report is submitted
- Description of any incidents of noncompliance in the past year or currently ongoing, or
  - if none, a statement that the permittee is in compliance with the permit
- Other additional information or documentation, if applicable

A copy of each report, signed and certified by a person described in Section 5.21 of the General Permit, will be retained with this Plan on the company intranet site for a minimum period of five (5) years.

7.0 POTENTIAL POLLUTANT SOURCES FROM INDUSTRIAL ACTIVITY

Ashcroft practices and procedures are intended to minimize the exposure of materials, containers, and equipment at the Site. Potential pollutant sources associated with industrial activities at the Site during the three-year period prior to this Plan update are summarized below. Control measures and best management practices for each activity that may be exposed to rainfall or snowmelt are included in Section 8 of this Plan.

7.1 POTENTIAL POLLUTANT SOURCES

Potential pollutant sources at the Site are summarized below and depicted on **Figure 2.** Control measures and best management practices are discussed In Section 8.

INDUSTRIAL ACTIVITY
Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage:
Vehicle or equipment fueling does not take place at the Site. Ashcroft policy prohibits the outdoor cleaning, maintenance (e.g., fluid changes, mechanical repairs), or storage of vehicles or equipment waiting for repair.

Paved areas dedicated to loading/unloading areas or employee and visitor parking are susceptible to minor fuel or oil leaks. Stormwater runoff from these areas may come into contact with these materials and carry pollutants into the catch basins in sheet runoff.

Solid De-Icing Material Storage:

Maintenance of paved areas and landscape care is provided by contracted service providers. De-icing materials, fertilizers, pesticides, or related products are not stored at the Facility in bulk quantities.

Any de-icing material used by Ashcroft to supplement snow and ice control is stored in closed containers and covered by tarps to prevent unnecessary exposure to precipitation.

Industrial Materials Storage Areas:

Raw materials, metal finishing chemicals and additives, aqueous cleaning products, oils, coolants, other process chemicals, and wastewater treatment chemicals are stored indoors. Products are used in production machine reservoirs and process tanks throughout the Facility. A list of all hazardous chemical products is maintained in the company's Hazard Communication (HazCOM) program and the Spill Prevention, Control, and Countermeasures (SPCC) plan.

Chemical storage occurs inside the Facility buildings. Ashcroft does not store any portable tanks, drums, or totes of chemical products outdoors. Bulk storage tanks for Oxygen, Argon, and Liquid Nitrogen are located outdoors as shown on Figure 2. In addition, portable gas cylinders are stored under cover at the receiving/loading docks depicted on the east end of the building.

The location of outdoor waste containers are shown on Figure 2. Used oil is stored outdoors in two (2) double-walled above-ground storage tanks (ASTs) provided with overflow alarms prior to off-site shipment. A summary of petroleum management areas is provided in the SPCC Plan which is readily accessible on-site.

Enclosed hydraulic compactors are provided for municipal trash and cardboard. A covered dumpster is provided for recyclable paper. Additional dumpsters or roll-off containers may be used for the collection of materials generated from routine facility maintenance or other project activity. All drain plugs are secured and containers are covered between addition of materials to prevent unnecessary exposure to precipitation.

Enclosed trailers are provided at the receiving/loading docks for the collection of wooden pallets and scrap metal. All handling of these materials takes place indoors under cover.

Above-ground tanks which hold metal finishing wastewater are located indoors. State and RCRA-regulated waste materials are stored in a designated hazardous materials storage room depicted on Figure2. A list of waste is included in the Emergency Response and Hazardous Waste Contingency Plan.

A general storage building located on the northeastern portion of the property is designated for all other items (e.g., miscellaneous parts and equipment).

Materials Handling Activities:

The primary loading and unloading areas for raw materials, finished products, intermediate products, by-products are the interior docks shown on Figure 2. The building structure and Ashcroft handling procedures prevent exposure of materials to rainfall.

These interior docks are also the loading area for State and RCRA-regulated waste materials. Ashcroft's waste management, handling, and loading procedures minimize the exposure of materials to rainfall.

The loading/unloading and handling procedures for petroleum products (i.e., oils and coolants) provided in the SPCC Plan minimize the exposure of this activity to stormwater. Pump out of the used oil ASTs is attended by trained Ashcroft personnel to prevent a release of material and discharge from the site.

Ashcroft procedures require that when moving material between buildings, trained operators ensure that containers are closed and secured to the material handling equipment prior to transfer. A preventive maintenance schedule is followed for powered material handling equipment.

Indoor Manufacturing Activities

Metal finishing chemicals and additives, aqueous cleaning products, oils, coolants, and other process chemicals are used in machine reservoirs or process tanks throughout the manufacturing areas of the building. Ashcroft procedures include employee training to ensure routine inspection and maintenance of equipment and the proper handling of chemical products.

Other Industrial Activity:

A variety of roof equipment, including ventilation units, heater exhaust vents, and vents from chemical processes and an evaporator unit are located on the roof area and exterior walls of the manufacturing building. Roof stacks and vents allow for removal of excess heat and vapors.

A preventive maintenance program has been implemented to help ensure proper operation of equipment systems. Routine roof inspections performed during the three-year period prior to the issuance of this SWPPP have not indicated any signs of pollutant deposits or discharge to stormwater. Although an impact to stormwater is not expected, roof areas are included in the site inspection program.

Buffering processes generating dust or particulates take place indoors and waste material is collected in two (2) cyclone dust collector units located on the exterior of the building. There are two dust collectors located on the north and south sides of the building for the collection of dusts generated from the buffering processes (Figure 2). The collectors are designed to limit contact with stormwater as all materials are collected directly into closed 55-gallon drums.

There are no floor drains present in the Facility that connect to the stormwater sewer system. Ashcroft policy prohibits interior building floor drains without a connection approval and permit from CT DEEP or authorization by a local authority for discharge as domestic sewage to a sanitary sewer.

7.1.1 Loading and Unloading Operations

The loading dock is the main location where raw materials, finished products, process chemicals, federal and state regulated waste materials are loaded or unloaded. The interior loading dock area is completely covered so that chemical transfer activities are not exposed to stormwater. Care is taken to ensure that materials received or staged for shipment are not stored on the dock for any extended period of time. Gas cylinders are loaded and unloaded at the adjacent dock area which is partially covered.

The potential pollutant sources of a release or spill at the loading and unloading areas depicted on Figure 2 are the hazardous materials listed in the Emergency Response Plan . Potential pollutants generally include: oils, metals, acids, caustics, aqueous cleaners, and State and RCRA-regulated waste materials.

7.1.2 On-Site Waste Management Practices

There is no current on-site solid waste disposal. A closed RCRA landfill is located beyond the fence line on the east side of the property. There is little to no impact on stormwater quality from this landfill. In addition, there is an inactive wastewater treatment plant in the southeastern corner of the property. The overhead piping to this wastewater treatment plant is no longer in use.

The former scrap metal dumpster containment pit is located under a roofed enclosure provided with secondary containment in the form of a dike. Any precipitation that may accumulate in the secondary containment area is visually checked for contaminants. The rain water accumulating in the pit typically evaporates. However, if a large volume of rain water is present and if no observable contaminants are found, the rainwater may be pumped onto the driveway.

Temporary roll-off containers may be staged on the east side of the Facility to hold materials generated from Facility maintenance activities.

At various times, machinery and other miscellaneous materials are stored on the eastern side of the building. The material generally consists of scrap machinery, wooden skids, and associated debris that will be staged for limited time periods prior to disposal. The main storage area for this material has a partial roof covering to limit stormwater exposure and is graded to prevent run-on of stormwater. All equipment stored in this area will first be cleaned of oil or foreign material, drained of liquids and oils with plugs replaced following draining, and covered with a tarp. The potential pollutants associated with this area include any oil residue or other materials that would be on or in the stored machines or metal. Any tanks or containers that are stored outside will be inverted so that rainwater cannot collect in the tank.

7.2 UNAUTHORIZED RELEASE OR DISCHARGE

During the three-year period prior to the date of certification of this SWPPP, there have not been any spills, leaks, or other unauthorized release of five (5) gallons or more of petroleum products, or of toxic or hazardous substances which could affect stormwater.

The General Permit defines toxic and hazardous substances as those listed in Connecticut Regulations 22a-430-4 (Appendix B Tables II, III, and V and Appendix D) and 40 CFR 116.4.

This section of the Plan will be updated throughout the term of the Facility's permit coverage should an unauthorized release or discharge occur. At a minimum, information will include:

- the date;
- the location;
- the type and quantity of material;
- the source and reason for the release or discharge; and
- response procedures

7.3 CORRECTIVE ACTION FOR UNAUTHORIZED RELEASE OR DISCHARGE

The conditions which trigger corrective actions, listed in Table 9 of the General Permit, include the unauthorized release or discharge (e.g., "spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit"). **Note that failure to take corrective action measures is a permit violation**.

Ashcroft policy requires that a triggering condition requiring corrective action, listed in Table 9 of the IGP, be documented and filed in the SWPPP within 24 hours of discovery as required by subsection 4.6.5 of the General Permit. Additional information which must be documented for any spill or leak, includes: the date/time clean-up was completed, staff involved in the event, all notifications made by Ashcroft, and measures taken to prevent the recurrence.

Should adverse conditions cause a delay, the documentation will be filed as soon as possible and the reason noted. The corrective action schedule outlined in Section 6.4.6 of this Plan will be followed.

Follow-up monitoring is not required but is recommended, especially in cases where an unauthorized discharge of non-stormwater reaches waters of the state. Under subsection 4.6.3.3 of the General Permit, in the event of any spill, leak, release, or discharge of non-stormwater not authorized by a permit, the event must be reported verbally to CT DEEP as soon as there is knowledge of the event. Reference the SPCC Plan for additional reporting information.

For any unauthorized release or discharge to waters of the state, subsection 4.6.3.3 of the General Permit requires that a report be submitted to CT DEEP as soon as there is knowledge of the event, following the Notification of Noncompliance link provided in the General Permit.

Ashcroft policy requires the documentation of corrective action measures in accordance with the schedule outlined in Section 4.6.1 of the General Permit and use of the Corrective Action Measure Requirements & Waiver Request form provided. This form may also be submitted to CT DEEP to request:

- an extension to timelines for implementing corrective action measures; or
- a waiver from further corrective action measures and/or monitoring.

8.0 STORMWATER CONTROL MEASURES

Current industrial activities which may be exposed to rainfall or snowmelt are summarized below. Control measures and best management practices for each activity are presented in the following sections.

Should the Pollution Prevention Team determine that a control measure is not achieving the intended effect, the control measure will be modified as required under Section 8.4.

This Plan will be revised, as appropriate, to address changes in exposed materials, industrial activities, or control measures.

8.1 SITE INSPECTIONS

The scope and schedule for routine and comprehensive site inspections are provided in Section 9 of this Plan.

8.2 GOOD HOUSEKEEPING

Good housekeeping practices which have been established to minimize contact of industrial materials with stormwater runoff and snowmelt include the following:

- Material storage areas are properly managed and routinely observed by Facility personnel.
- Containers are covered/closed between addition of materials to prevent unnecessary exposure to precipitation and ground surfaces are maintained free of debris.
- Containers are maintained in clean and sound condition; any drain plugs are secured to prevent discharge of any residual liquids.
- Any de-icing material used by Ashcroft to supplement snow and ice control is stored in closed containers to prevent unnecessary exposure to precipitation.
- The sweeping frequency for the paved areas is determined based on routine inspection observations.
- Immediate action is taken as needed to address poor housekeeping practices which are observed.

8.3 MATERIAL HANDLING

- The building structure at the loading and unloading docks and Ashcroft handling procedures prevent exposure of materials to rainfall.
- The temporary outdoor storage of raw materials on shipping pallets prevents direct contact with the ground. Production schedules determine the storage time.
- Designated outdoor storage areas are located away from vehicle traffic routes to prevent accidental contact.
- Trained operators ensure that containers are closed and secured to the material handling equipment prior to transfer.
- Materials and containers are stored in a manner which prevents damage due to improper weight distribution. Manufacturer's instructions are followed for the stacking of any materials or containers.
- Routine off-site shipment schedules for waste materials are followed to maintain available storage space.
- Loading/unloading and handling procedures for petroleum products (i.e., oils and coolants) are included in the SPCC Plan.

8.4 SPILL PREVENTION AND RESPONSE PROCEDURES

The prediction of spill events and the control measures implemented to prevent a spill/release of petroleum products (i.e., oils and coolants) are detailed in the SPCC Plan and Emergency Response and Hazardous Waste Contingency Plan.

All Ashcroft employees are required to follow the internal reporting procedures should they observe the following so that response procedures can immediately be initiated:

- a leak, spill, or release of material inside of the facility; or
- a leak, spill, or release of material on the property; or
- any condition observed which could potentially result in a leak, spill, or release of material.

Emergency contact information is available in locations that are readily accessible and available to employees. Spill response supplies are maintained by the Pollution Prevention Team in readily available locations for use by trained employees.

The Facility minimizes the potential for leaks and spills through the control measures discussed in this section.

Potential release areas include the materials loading/unloading docks, areas of onsite waste accumulation, dust generation processes, and roof areas. Spill response procedures are presented in the Facility SPCC Plan.

Facility employees are familiar with the potential spill/pollution areas and response procedures if a spill or leak should occur. Employees are also aware of the locations of spill clean-up equipment. Any spills are immediately reported to Security and/or SWPPP team member(s) and spill response procedures are initiated. Reporting spills and leaks should follow the new spill reporting regulations (March 2022) to determine when a spill should be reported to the CT DEEP. Spills or leaks greater than 5 gallons of any toxic or hazardous substance must be documented in the SWPPP.

Containment

There are several exterior ASTs present at the Facility: two-1,500-gallon used oil tanks, and above-ground tanks for liquid nitrogen, argon, and oxygen. The hazardous waste storage area has a permanent roof cover which prevents exposure of these areas to stormwater. Other chemical drums, totes, and other containers are stored inside the Facility.

Dumpsters

The Facility dumpsters / roll-offs are inspected during routine monthly Facility inspections to ensure the dumpsters / roll-offs are in sound watertight condition and are provided with a cover to prevent exposure to rainfall. Monthly inspections are documented on the monthly inspection form located in **Attachment G**. Dumpster covers are kept closed when they are not actively being loaded or unloaded.

Loading Docks

The Facility's loading dock areas consist of overhead doors with dock seals. Facility personnel are present at every delivery or shipment and are trained to respond to a spill. Spill response equipment is located near each loading dock and is inspected every month.

Should a spill occur, the response and reporting procedures to be undertaken are the following:

1. Immediately Contact Program Manager or Alternate Program Manager

In the event of a spill at the Facility, the EHS Manager, or her Alternate, shall be contacted immediately. There will always be one person, either at the Facility or on call (and available to respond to an emergency within an hour), who is responsible for coordinating emergency response measures. This person will have the authority to use all resources necessary to carry out the procedures outlined in this SWPP Plan.

A mobile communication system (i.e., telephone, radio, walkie talkie, or cellular phone) will be available near the storage locations during transfer operations. Delivery trucks that are equipped with a communication system will be considered adequate means for emergency communication.

Name	Phone Number
EHS Manager	203-258-9094
Director of Order Fulfillment	203-385-0605
EHS Specialist	203-385-0553
Facilities Manager	203-385-0432
Shipping Manager	203-385-0329
GZA GeoEnvironmental, Inc	860-266-3837

Program Manager Assumes Control

The Program Manager shall be informed of the spill location and severity in order to properly determine the resources and manpower needed. The Program Manager shall remain in control for the duration of the response.

Summons of Outside Support

The Program Manager, or individual directed by the Program Manager, shall make the necessary contact with outside support groups and regulatory agencies.

Large Spills Coordinators

In the event of a spill, the on-call spill contractors for Ashcroft, will be called to control the situation. Contact information for the primary and alternate spill contractors is provided in the Emergency External Contact List provided at the beginning of this Plan.

Regulatory Agencies: CT DEEP and National Response Center

A spill of ANY QUANTITY to the ground, surface water, sewer, ditch, or culvert, is immediately reportable, by law, to one or more municipal, state, or federal authorities. The Program Manager is responsible for immediate notification of a spill to the proper authorities and agencies (listed below). In addition to the initial telephone contact, a written spill report is also required for the CT DEEP. Emergency phone numbers are in the offices of the Program Manager and Alternates, and posted in several locations around the facility, including the Hazardous Waste Storage Area.

The following information should be provided when contacting outside agencies:

- Identity of the caller
- Contact phone number
- Location of spill
- Type of product spilled
- Quantity spilled
- Extent of actual and/or potential water pollution
- Date and time of spill
- Cause of spill
- Action taken to contain, remove, or otherwise properly mitigate the release

Additional Response Procedures

Program Manager's Responsibility: The Program Manager shall assess possible hazards to human health and/or the enviro**nment** that may result from a spill/release at the Facility. The Program Manager must consider both direct and indirect effects of a spill/release. He/she must also decide whether an emergency exists with such an episode.

In the event of an emergency, the Program Manager shall assume the following responsibilities:

a. **Immediate Identification and Assessment:** The Program Manager or Alternate shall immediately identify the nature of the emergency, noting the exact source, type, quantity and the extent of the spill.

b. Immediate Action: The Program Manager shall perform the following immediate actions:

- Notify all building occupants.
- Notify Police and Fire Department as appropriate.
- Notify appropriate emergency teams, if needed. Designate individual to meet the responding fire, police or ambulance service at the appropriate staging area for that building.
- Notify the local safety officials, Connecticut Department of Energy and Environmental Protection (CT DEEP), and the U.S. Environmental Protection Agency (EPA), if the Program Manager determines that there is an imminent or actual emergency, which can threaten the public health, safety, or welfare of the environment.

c. **Assessment of Release Off-Facility:** If the emergency can threaten human health and/or the environment off-facility, the Program Manager shall:

- Notify local authorities (e.g. Fire Department, Police Department, and Public
- Health Department) if an evacuation of local areas is advisable.
- Be available to assist local authorities in making the decision to evacuate the local area.

d. **During an Emergency:** The Program Manager shall take measures to minimize the risk for fires, explosions, or releases or contain these risks from spreading to other storage areas at the facility. This ensures that the appropriate emergency response personnel can initiate cleanup.

e. **Post Emergency Activities:** After an emergency, the Program Manager shall:

- Supervise cleanup efforts, ensure that the recovered materials are properly stored or disposed.
- Ensure that all emergency equipment is cleaned and ready for future use.
- Ensure that no waste that is incompatible with the released material is stored or disposed of in the affected area until cleanup procedures are completed.
- Notify local authorities and the CT DEEP that cleanup has been completed and emergency equipment has been restored, before resuming activities in the affected areas.
- Record the time, date, and details of the incident.

Notification Requirements

The following are minimal procedures for notifying the CT DEEP of releases or the threat of release of oil or hazardous substances, which must be reported. Verbal notification to CT DEEP shall consist of the following information to the extent known:

- Name and telephone number of callers
- Location of release/threat of release
- Date and time of incident
- Identity of material involved
- Approximate quantity of substance
- Source of release/threat of release
- Brief description of incident
- Name and phone number of owner or operator
- Name and phone number of contact person
- Measures taken or proposed
- Any information on potential environmental impacts

Specific Response Scenarios for Releases

The Program Manager or his/her Alternate shall be responsible for the proper implementation of the emergency procedures. Emergency procedures for specific types of emergencies are addressed in this section.

Name	Type	Phone Number
Authorities or Agencies		
Stratford Fire Department	Local Fire Department	911 or 203.385.4070
Stratford Police Department	Local Police Department	911 or 203.385.4100
Bridgeport Hospital	Local Hospital with Emergency Service	203.384.3566
Clean Harbors Environmental Services, Inc.	Spill Clean Up Contractor	800.645.8265
Stratford Dept. of Emergency Management	Board of Health	203.385.4070
Stratford Water Pollution Control	Local POTW	203.385.4065
CT DEEP 24-hour Spill Hotline	State Environmental Agency	860.424.3338 or 1- 866-DEP-SPIL (1. 866.337.7745)
National Response Center	Federal Spill Response	800.424.8802
EPA Region 1: Oil Spills/SPCC	Federal Spill Reporting	617.918.1786 or 617.723.8928
EPA Region 1: Customer Call Center	Alternate Federal Spill Reporting Number	888.372.7341

8.5 SEDIMENT AND EROSION CONTROLS

During the site inspection on September 6, 2025, GZA observed that the Facility access roads and parking areas, were paved and curbed to minimize erosion. Areas subject to industrial activity are impervious for the most part, reducing the total area where erosion and the release of sediment to stormwater discharge can occur. To prevent significant soil erosion, the unpaved open areas are either maintained with grass, are landscaped, or have natural vegetation.

GZA did not observe areas of significant soil erosion at the time of this site visit on September 6, 2025.

8.6 PREVENTIVE MAINTENANCE

To minimize the likelihood of leaks, spills, or other releases which may impact stormwater, Ashcroft has implemented a preventive maintenance program for the site's stormwater conveyance system, structural controls, and other facility equipment and operational systems that could discharge pollutant(s) to stormwater in the event of a malfunction or failure.

8.6.1 Stormwater Conveyance System

Maintenance of the stormwater conveyance system at the site includes cleanout of the catch basins, sediment chambers, and stormwater drain lines. Maintenance frequency is determined based on routine inspection observations and findings.

As required under subsection 4.2.10 of the IGP, catch basin cleanout is triggered "when the depth of debris reaches half of the sump depth" and to keep "the debris surface at least six inches below the lowest outlet pipe." In addition, paved areas are swept in the spring following use of sand for deicing during winter months.

In addition, the preventive maintenance program includes maintenance of all structural control measures at the Site including grading, berms, curbing, and paved areas.

8.6.2 Industrial Equipment and Systems

Preventive maintenance to reduce the potential for contamination of stormwater involves the regular inspection and testing of plant equipment and operational systems. The purpose of these inspections is to identify conditions that could cause failures which result in discharges of materials and chemicals.

The preventive maintenance program includes periodic inspections of and/or testing of containers or equipment that can result in a discharge to the environment, such as:

- any container or equipment which is located outdoors
- drums, tanks, totes, and other storage containers that may be moved/handled outdoors
- powered material handling equipment that is used outdoors
- drums, tanks, totes, and other storage containers that may be handled in close proximity to a man door or an overhead door
- production equipment reservoirs and other containers which could migrate toward a man door or an overhead door in the event of a release

Appropriate and timely adjustment, repair or replacement of containers or equipment as needed will ensure proper working order.

Preventive maintenance program documented inspections are maintained electronically on-site by Facilities Department and is available for review upon request. Documentation will include dates of regular maintenance, date that repair/replacement is discovered, date that the control measures returned to full function after repairs, and justification for extended maintenance/repair schedules.

8.7 EMPLOYEE TRAINING

Annual training is conducted to provide Ashcroft employees with an understanding of the purpose and objectives of this Plan. Training is managed by the Pollution Prevention Team and required attendance is determined based on review of employee roles and responsibilities. Ashcroft policy requires that all employees whose activities may affect stormwater quality and those who are responsible for implementing activities necessary to meet the conditions of this Plan complete the annual training. New employees receive training within ninety (90) days of employment and work under the direct supervision of a trained employee prior to completion.

Training topics include:

- SWPPP purpose and objectives
- Pollution Prevention Team roles and responsibilities
- Potential pollutant sources and activities

- Schedules and procedures for stormwater control measures
- Schedules and procedures for assessments, inspections, and corrective actions
- Monitoring program requirements and management
- Resilience considerations
- Prohibited (unauthorized) discharges and activities
- Corrective action requirement and procedure

Training may be provided by a qualified Ashcroft employee or a contracted service provider. Training materials and a sign-in sheet are maintained electronically by Ashcroft's Pollution Prevention Team and are included in **Attachment K**. A written record will be maintained in the SWPPP, as required in Section 3 of this Plan.

The General Permit requires that personnel understand the requirements presented in this Plan and their specific responsibilities with respect to those requirements. In addition to the training outlined above, on-the-job training helps ensure that employees understand and properly execute established procedures.

8.8 CORRECTIVE ACTIONS FOR STORMWATER CONTROL MEASURES

The conditions which may trigger corrective actions, listed in Table 9 of the General Permit, also include:

- Control Measure Not Stringent Enough to Meet Water Quality Standards (Reference IGP subsection 4.6.3.5)
- Control Measure Never Designed, Installed, Implemented, or Maintained (Reference IGP subsection 4.6.3.6)
- Change in Design, Operation, or Maintenance at a Facility which significantly changes the nature of, or increases the quantity of, pollutants discharged. (Reference IGP subsection 4.6.3.7)

Ashcroft policy requires that a triggering condition requiring corrective action, listed in Table 9 of the IGP, be documented and filed in the SWPPP within 24 hours of discovery as required by subsection 4.6.5 of the General Permit.

Should adverse conditions cause a delay, the documentation will be filed as soon as possible and the reason noted. The corrective action schedule outlined in Section 6.4.6 of this Plan will be followed. As noted in Table 9, **failure to take corrective action measures is a permit violation.**

Ashcroft policy requires the documentation of corrective action measures in accordance with the schedule outlined in Section 4.6.1 of the General Permit using the Corrective Action Measure Requirements & Waiver Request form provided. This form may also be submitted to CT DEEP to request:

- an extension to timelines for implementing corrective action measures; or
- a waiver from further corrective action measures and/or monitoring.

9.0 SITE INSPECTIONS

Routine monthly inspections and semi-annual comprehensive site compliance evaluations may be performed by qualified Ashcroft staff or a contracted service provider. The results of the visual and analytical water quality monitoring included in Section 6 of this Plan during the past year will be reviewed when planning for these inspections and areas of concern will be evaluated.

The following areas and activities will be observed during monthly and semi-annual inspections:

- Potential pollutant sources from industrial activities (see Section 7)
- Control measures and relevant procedures (see Section 8)
- Any location where an unauthorized release has occurred during the 3-year period prior to the inspection
- Each sampling point and discharge outfall
- The presence of non-stormwater discharges which are not authorized under Section 4.7
- Other(s) identified during the review of inspections performed over the past year
- Other(s) identified during the review of corrective action documentation

9.1 INSPECTION DOCUMENTATION

Site inspection report forms will include the following information, at a minimum:

- inspection date and time
- printed name(s), signed name(s), title(s), and signature(s) of the inspector(s), noting members of the pollution prevention team
- weather conditions
- a description of any discharges occurring at the time of the inspection
- as required under subsection 4.4.4.2 of the General Permit, observations relating to the following:
    - good housekeeping measures
    - the condition of existing control measures
    - signs of soil erosion at the facility
    - any potential pollutant sources at the site not identified in the SWPPP
    - any discharges from the site not identified in the SWPPP
    - any evidence of pollutants entering the drainage system
    - lack of control measure(s) needed to comply with the permit requirements

  - "the physical condition of and around all outfalls, including: any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water"

- any actions required based on observations made during the inspection such as:
  - additional control measure(s) which should be evaluated to help ensure compliance,
  - any maintenance, repair, or replacement needs
- any immediate actions taken on the day of the inspection
- the status of any outstanding corrective actions noted on prior inspection reports

In addition to the information above, comprehensive site inspections will include the following activities, as required under subsection 4.4.3.3 of the General Permit:

- "Determine whether structural stormwater management measures, erosion control measures, control measures and other structural pollution prevention measures identified in the SWPPP are implemented and maintained in accordance with best engineering practices, manufacturer's specifications, and the Connecticut Stormwater Quality Manual."
- "Inspect the integrity and functionality of stormwater treatment systems (e.g., oil-water separators)."
- "Inspect infiltration practices used in the treatment of stormwater to ensure that they are not causing pollution to ground water."
- Resilience measures: "Inspect the implementation and integrity of structural improvements, enhanced/resilient pollution prevention measures, and other mitigation measures that are intended to minimize impacts from stormwater discharges from major storm events such as hurricanes, storm surge, extreme/heavy precipitation."
- Review monitoring results to determine if new control measures are required to be implemented in accordance with corrective actions procedures presented in this Plan.
- Review documentation to confirm that the requirements included in Section 3 of this Plan are met.

9.2 ROUTINE VISUAL INSPECTION

One routine visual inspection is documented each month on the report form provided in **Attachment G**. At least once each calendar year, a routine inspection will be conducted when stormwater discharge is occurring at the Site. If a discharge location is not accessible, the General Permit requires that a nearby downstream location be inspected.

The form will be modified, as needed, based on inspection observations and updates to this SWPPP. Records will be retained as required in Section 3 of this Plan.

9.3 COMPREHENSIVE SITE COMPLIANCE EVALUATION

Comprehensive Site Compliance Evaluations (CSCEs) conducted semi-annually, during normal facility operating hours and during a rainfall event if possible, are documented on the report form provided in **Attachment I**.

Each requirement addressed in this Plan, and all areas at the Facility covered, are included in the evaluation. The scope of the CSCE includes elements such as: Stormwater Management Systems, Drainage Areas, Impervious Areas, Structural and Non-structural Control Measures, Buildings (and other permanent structures/covers).

In addition, as required under subsection 4.4.3.3 of the IGP, the CSCE includes the following activities:

- "Make a visual inspection of material handling areas, and material storage areas, and other potential sources of pollution identified in the SWPPP for evidence of, or the potential for, pollutants entering the stormwater drainage system".
- "Determine whether structural stormwater management measures, erosion control measures, control measures and other structural pollution prevention measures identified in the SWPPP are implemented and maintained in accordance with best engineering practices, manufacturer's specifications, and the Connecticut Stormwater Quality Manual".
- "Inspect the integrity and functionality of stormwater treatment systems".
- "Inspect infiltration practices used in the treatment of stormwater to ensure that they are not causing pollution to ground water".
- "Inspect the implementation and integrity of structural improvements, enhanced/resilient pollution prevention measures, and other mitigation measures that are intended to minimize impacts from stormwater discharges from major storm events such as hurricanes, storm surge, extreme/heavy precipitation".
- "Review required documentation in the SWPPP semi-annually to confirm compliance with Section 4.3".
- " Review monitoring results to determine if new control measures are required to be implemented in accordance with corrective actions in schedule in Section 4.6".

The inspection form will be modified, as needed, based on inspection observations and updates to this SWPPP. Records will be retained as required in Section 3 of this Plan.

9.4 CORRECTIVE ACTIONS FOR INSPECTIONS

A corrective action is triggered when any inspection or observation reveals color, odor, floating solids, settled solids, suspended solids, or foam in the stormwater discharge, pursuant to subsection 4.6.3.8 of the General Permit.

A corrective action procedure is included in Section 6.6.2 of this Plan.

9.5 SECTOR SPECIFIC REQUIREMENTS

Sector AC permittees are not subject to additional inspection requirements beyond those specified in Section 4.4 of the IGP.

10.0 RESILIENCE MEASURES

Ashcroft, Inc. believes that the stormwater control measures implemented at the Facility have been effectively minimizing the potential impacts from stormwater discharges resulting from severe weather events. Should conditions change, additional resilience measures will be considered, as required under subsection 4.3.2.8 of the General Permit.

The flow of stormwater runoff from the Ashcroft facility combines with off-site stormwater drainage prior to discharging to a conveyance channel shown on **Figure 2**. Ashcroft, Inc. understands that the Town of Stratford Platt Street Pump Station will operate during significant storms and other high-water events to help mitigate flooding near the banks of the Housatonic River.

In addition, Ashcroft has limited outdoor material storage and the materials stored outside are secured, elevated, and under cover.

11.0 FUTURE CONSTRUCTION

The Facility currently does not have plans for construction at the Site; however, subsection 4.3.2.11 of the General Permit will be referenced in planning any future construction activities to ensure that applicable requirements will be met.

Specifically, all construction activities must comply with the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Connecticut Stormwater must be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities.

Additionally, all activities that will disturb greater than one acre must be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. For new building construction, alternatives to copper or galvanized roofing or building materials will be considered for use where these materials will be exposed to stormwater.

Should future construction activities result in changes to the number or location of discharge points at the Site, Ashcroft will notify CT DEEP, as required, and update the SWPPP for re-certification.

12.0 ADDITIONAL DOCUMENTATION

Instructions: The permittee is also required to keep in the SWPPP the following documentation:

- any other documentation as required in sector-specific requirements in the IGP;
- a copy of the registration submitted to DEEP, along with any correspondence exchanged between the permittee and DEEP specific to coverage under this permit;
- a copy of the Authorization Letter the permittee receives from DEEP assigning a permit number (this letter will be sent by email after the NOI is approved);
- documentation regarding Coastal Consistency Review (if applicable during registration);
- documentation regarding Natural Diversity Data Base (if applicable during registration);
- documentation regarding Conservation or Preservation Restriction Information (if applicable during registration);
- any other documentation regarding corrective action as required by the IGP; and
- a copy of the permit (an electronic copy easily available to SWPPP personnel is also acceptable)

Some of the following documentation is not required to be submitted during registration. Each document section outlines whether it is required for registration or if it is required only when applicable.

Please see the attached documents as required by the General Permit that are applicable to Ashcroft.

ATTACHMENT A – GENERAL PERMIT NOTICES OF INTENT AND COVERAGE

Connecticut
Department of Energy & Environmental Protection
WATER PERMITTING & ENFORCEMENT

General Permit Registration Form for the Discharge of Stormwater Associated with Industrial Activity

Part I: Registration Types

Registration Types	
☑	**New Registration** Are you on a site where industrial activity has been previously located? ☑ Yes ☐ No Are you proposing a new industrial activity on a site where industrial activity has not been previously located? ☐ Yes ☑ No
☐	**Replacement of NPDES** If selected, please provide on the line below permit #'s for the previously authorized discharge(s) _____

Part II: Fee Information

☐ A fee of $312.50 applies to:

Municipalities (50% discount of $625 fee per CGS 22a-6)

☐ A fee of $625.00 applies to:

Companies that employ fewer than fifty (50) employees statewide (excluding seasonal employees employed no more than 120 days in a year) ***or*** have gross annual sales of less than five (5) million dollars.

Federal or state operated industrial activities.

☑ A fee of $1,250.00 applies to:

Companies that employ fifty (50) or more employees statewide (excluding seasonal employees employed no more than 120 days in a year) ***and*** have gross annual sales of greater than five (5) million dollars.

The registration will not be processed without the fee. The registration fee is non-refundable and shall be paid by check or money order payable to the Department of Energy and Environmental Protection.

Part III: Registrant Information

1. Registrant /Client Name: ASHCROFT INC.

Registrant Type: Registrant

Secretary of the State business ID #: 0858015

Mailing Address: 250 E MAIN ST

City/Town: STRATFORD State: CT Zip Code: 06614

Business Phone: (203) 378-8281 ext.:

Example:(xxx) xxx-xxxx

Contact Person: AIMEE APATOW Title :

E-Mail: aimee.apatow@ashcroft.com

Additional Phone Number (if applicable): ext.

2. Verify that the Registrant is the **operator** of the proposed activity: ☑ Yes

Part III: Registrant Information (continued)

3. Billing Contact

Contact Person: AIMEE APATOW Title:

Mailing Address: 250 E MAIN ST

City/Town: STRATFORD State: CT Zip Code: 06614

Business Phone: (203) 378-8281 ext.

Email: aimee.apatow@ashcroft.com

4a. Primary contact for departmental correspondence and inquiries.

Contact Person: AIMEE APATOW Title:

Mailing Address: 250 E MAIN ST

City/Town: STRATFORD State: CT Zip Code: 06614

Business Phone: (203) 378-8281 ext.

Email: aimee.apatow@ashcroft.com

4b. Site contact if registrant is out of state.

☐ Not applicable

Contact Person: AIMEE APATOW Title:

Mailing Address: 250 E MAIN ST

City/Town: STRATFORD State: CT Zip Code: 06614

Business Phone: (203) 378-8281 ext.

Email: aimee.apatow@ashcroft.com

5. List engineering consultant, attorney or other representative employed or retained to assist in preparing the registration or maintaining permit compliance.

Consultant/Firm Name: Consultant Type:

Contact Person: Title:

Mailing Address:

City/Town: State: Zip Code:

Business Phone: ext.

Email:

Secretary of the State business ID #:

6. Select the ownership type of the facility. Corporation

Part IV: Site Information

1.

Site Name: Ashcroft Inc.

Street Address or Location Description: 250 E Main St

City/Town: Stratford State: CT Zip Code: 06614

2. Primary Sector: AC - Electronic, Electrical, Photographic and Optical Goods

Primary SIC Code: 3829 - Measuring and Controlling Devices, Not Elsewhere Classified (except medical thermometers, electr

Primary NAICS Code: 334519 - Other Measuring and Controlling Device Manufacturing

2.a Is there a Co-Located Sector? ☐ Yes ☑ No

3. a. Are you proposing to authorize a stormwater discharge from a **new** road salt de-icing materials storage facilities at the site in question? ☐ Yes ☑ No

Note: If **"*yes*"**, proceed to 3b. If "***no***", proceed to question 4.

b. Is the site within 250 feet of a well utilized for potable drinking water supply or within a Level A aquifer protection area as defined by mapping pursuant to Section 22a-354c of the Connecticut General Statutes? ☐ Yes ☐ No ☑ NA

Note: If you answered "***yes***" to both the questions 3a and 3b, you are **NOT** eligible to register under this permit. Contact DEEP.StormwaterStaff@ct.gov for further guidance.

4. Is there an existing road salt or deicing materials storage unit that is or will be in place for more than 180 days a year at the site? ☐ Yes ☑ No

5. a. Is there exposure or the potential for exposure of your stormwater to mercury? ☐ Yes ☑ No

b. Is there exposure or the potential for exposure of your stormwater discharge to Polychlorinated biphenyls (PCBs)? ☐ Yes ☑ No

6. **INDIAN LANDS:**

a. Does the facility discharge to federally recognized Indian Country Lands? ☐ Yes ☑ No

Note: If you answered "***yes***" to question 6a, you are **NOT** eligible to register under this permit. Contact DEEP.StormwaterStaff@ct.gov for further guidance.

Part IV: Sector Related Additional Questions

If you selected either your Primary Regulated Sector or Co-Located Sector as **"A"**

1. Does this discharge point receive discharge resulting from spray down or intentional wetting of logs at wet deck storage areas? ☐ Yes ☐ No ☑ NA

If you selected either your Primary Regulated Sector or Co-Located Sector as **"J"**

1. Does this discharge point receive mine dewatering discharges from crushed stone mines, construction sand and gravel mines, or industrial sand mines? ☐ Yes ☐ No ☑ NA

If you selected your Primary Regulated Sector as **"A"**

1. Does your facility manufacture, use, or store creosote or creosote-treated wood in areas that are exposed to precipitation? ☐ Yes ☐ No ☑ NA

If you selected your Primary Regulated Sector as **"J"**

1. Does your facility conduct blasting? ☐ Yes ☐ No ☑ NA

If you selected your Primary Regulated Sector as **"S"**

1. Does the facility conduct aircraft de-icing utilizing area? ☐ Yes ☐ No ☑ NA

2. Does the facility conduct aircraft de-icing utilizing ethylene glycol? ☐ Yes ☐ No ☑ NA

3. Does the facility conduct aircraft de-icing utilizing propylene glycol? ☐ Yes ☐ No ☑ NA

If you selected your Primary Regulated Sector as **"AF"**

1. Does the facility store solid de-icing materials, even in small quantities? ☐ Yes ☐ No ☑ NA

2. Is the facility used exclusively for solid de-icing material storage (e.g., a satellite station)? ☐ Yes ☐ No ☑ NA

3. Are vehicle repair or maintenance activities conducted on-site at the facility? ☐ Yes ☐ No ☑ NA

Part IV: Site Information (continued)

7. COASTAL BOUNDARY:

The site is located in a coastal boundary. ☐ Yes ☑ No

8. ENDANGERED OR THREATENED SPECIES:

The site is located in an area identified as a habitat for endangered, threatened or special concern species. ☐ Yes ☑ No

NDDB Determination number: _____

9. AQUIFER PROTECTION AREAS:

The site is within a level A aquifer protection area. ☐ Yes ☑ No

10. CONSERVATION OR PRESERVATION RESTRICTION:

Is the property subject to a conservation or preservation restriction? ☐ Yes ☑ No

Part V: Stormwater Discharge Information **Table 1**

1. Identify the type, material, size and location of conveyances, outfalls, or channelized flows that convey your discharges:

Outfall #	a) Type	b) Pipe Material	c) Pipe Size	d) Longitude (-xx.xxxxxx)	d) Latitude (xx.xxxxxx)	e) What method was used to obtain your latitude /longitude information?	f) Is Substantially Identical to another outfall?
001	Swale	Select One	Select One	-73.116053	41.206180	ezFile Portal Map	No
	Select One	Select One	Select One			Select One	
	Select One	Select One	Select One			Select One	
	Select One	Select One	Select One			Select One	
	Select One	Select One	Select One			Select One	

Part V: Stormwater Discharge Information (continued) Table 2

2. Provide the following information about the receiving water(s)/wetland(s) that receive stormwater runoff from your site, either directly or through the Municipal Separate Storm Sewer System (MS4):

Outfall #	a) To what system or receiving water does your stormwater runoff discharge? either "Surface Waterbody" or "Wetland" or "Publicly or privately owned".(If you select Wetland or Publicly or privately owned, columns c.1&2 of this table are not required to be completed)	b) What is your watershed ID (freshwater) or 305b ID (estuary)?	c.1) Is your receiving water identified as an impaired water?	*If you answered yes to question c.1, then answer the question below.* c.2) Has any Total Maximum Daily Load (TMDL) been approved for your receiving waterbody?
001	Surface Waterbody (i.e. stream, brook, river etc.)		☐ YES ☐ NO ☑ NA	☐ YES ☐ NO ☑ NA
	Select One		☐ YES ☐ NO ☐ NA	☐ YES ☐ NO ☐ NA
	Select One		☐ YES ☐ NO ☐ NA	☐ YES ☐ NO ☐ NA
	Select One		☐ YES ☐ NO ☐ NA	☐ YES ☐ NO ☐ NA
	Select One		☐ YES ☐ NO ☐ NA	☐ YES ☐ NO ☐ NA

3. TMDL Records:

Outfall #	Name	Year	Name	Year	Name	Year	Name	Year	Name	Year
001										

Part VI: Pollution Prevention Plan Availability

All applicants must submit a completed and approvable Stormwater Pollution Prevention Plan (SWPPP).

Part VII: Confidential Information in the Pollution Prevention Plan

If the registrant claims that certain elements of the Plan constitute a trade secret or are otherwise exempt from the disclosure requirements of the state Freedom of Information Act (FOIA), they shall follow the procedure below regarding information subject to FOIA requirements.

Does your plan withhold certain confidential information from the public? ☐ Yes ☐ No

Please see directions below regarding withholding information.

Instructions for plan confidentiality:

Under the Connecticut Freedom of Information Act (FOIA), a Registrant may have reason to withhold from public disclosure certain information in a plan or document prepared and maintained pursuant to a requirement of the general permit. Such information in a plan or document may be redacted provided the Registrant makes specific notation on the registration form filed with the Department: (1) that such claim is being made with a brief explanation of the type of information being withheld or redacted and the reason(s) therefore; and (2) of the location within the plan or document where such information has been redacted review either or removed. A plan or document that is being made available for public on a website or provided directly to a member of the public as a hardcopy may be in its redacted form. However, when the Department requests such plan or document be submitted for Department review, the Department will require that it be submitted in its unredacted form, in which case the Registrant must specify the information within such plan or document that is claimed to be confidential with the specific notations described above. The Department will not release any such information to the public which the Registrant claims must be withheld unless a determination has been made by the Department and any subsequent appeal of such determination filed with the Connecticut Freedom of Information Commission results in a determination that such information shall not be withheld from the pub lic. If the Registrant seeks a determination regarding such claim of confidentiality from the Connecticut Freedom of Information Commission without obtaining a prior determination from the Department, the Registrant shall notify the Department in writing of such pending determination, at which time the Department will not release such information to the public unless otherwise determined by the Connecticut Freedom of Information Commission.

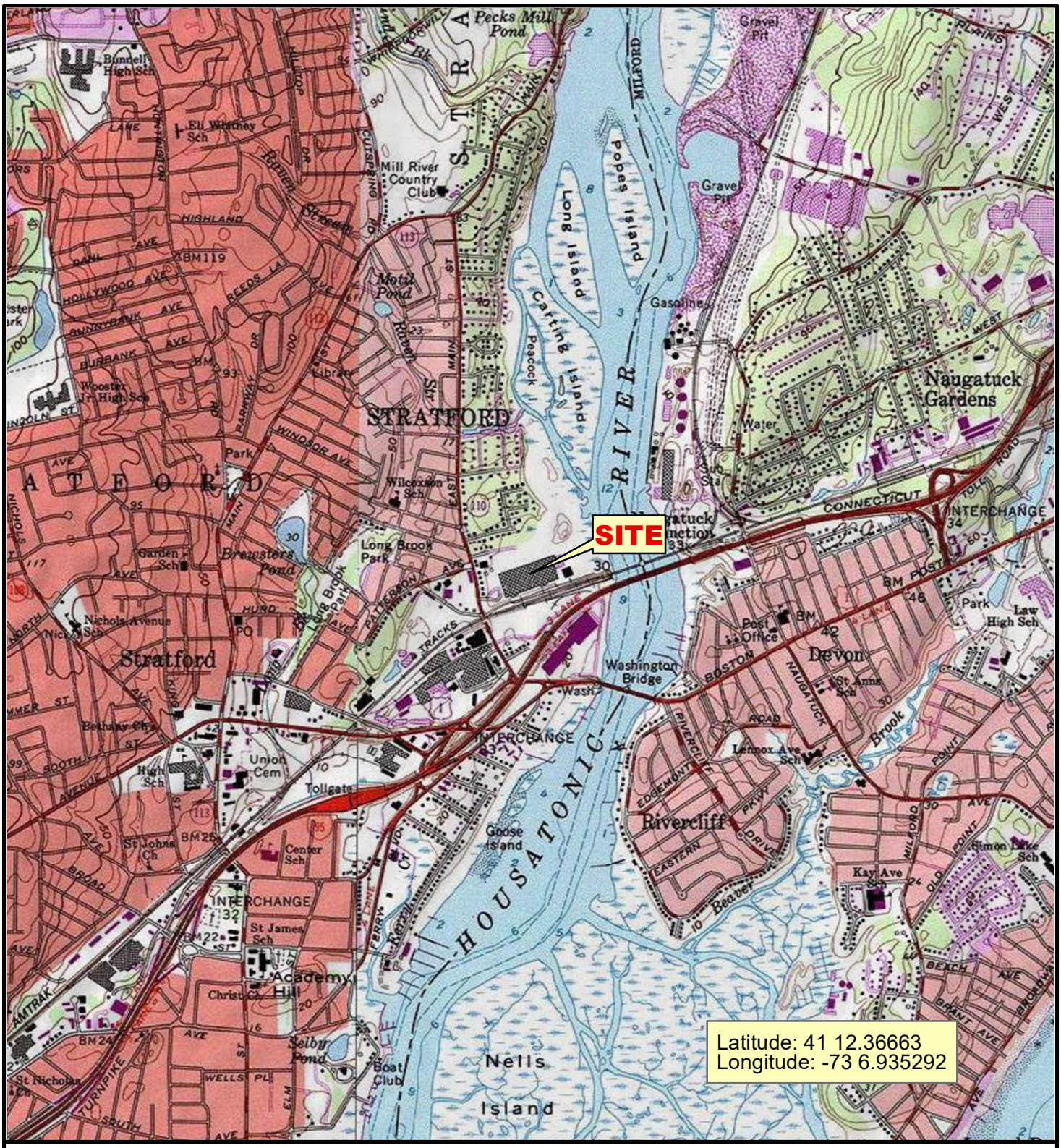
Part VIII: Registrant Certification

The registrant *and* the individual(s) responsible for actually preparing the registration must sign this part. A registration will be considered incomplete unless all required signatures are provided.

"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 for an activity located on this application 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 Conn. Gen. Stat. I also understand that knowingly making any false statement 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 Conn. Gen. Stat., and any other applicable law."

Signature of Registrant and Date	
AIMEE APATOW	
Name of Registrant (print or type)	Title (if applicable)
Signature of Preparer and Date	
Name of Preparer (print or type)	Title (if applicable)

ATTACHMENT B –SITE LOCATION FIGURE



SOURCE : USGS TOPOGRAPHIC QUADRANGLES SCANNED BY THE NATIONAL GEOGRAPHIC SOCIETY & I-CUBED, COPYRIGHT 2011

Data Supplied by : esri

0 1,000 2,000 4,000 6,000

SCALE IN FEET

N W E S

PROJ. MGR.: CS
DESIGNED BY: CS
REVIEWED BY: REK
OPERATOR: MJT

DATE: 10-27-2025

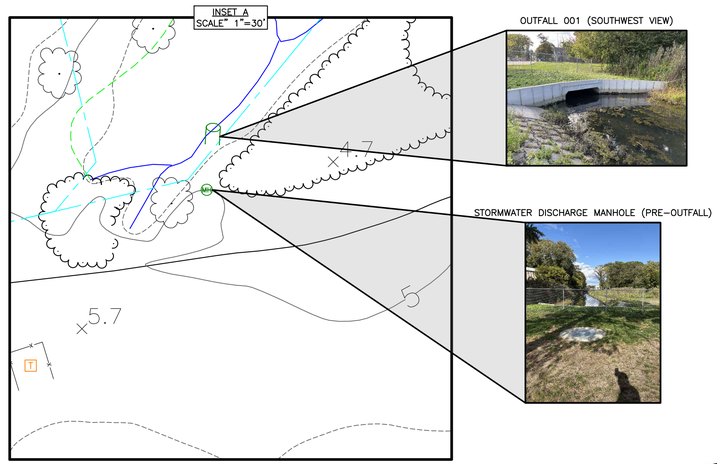
SITE LOCATION MAP

250 E MAIN ST
STRATFORD, CONNECTICUT

JOB NO.
05.0047407.05

FIGURE NO.
1

ATTACHMENT C – SITE LAYOUT FIGURE



OUTFALL 001 (SOUTHWEST VIEW)

STORMWATER DISCHARGE MANHOLE (PRE-OUTFALL)

LEGEND

- PARCEL BOUNDARY
- BUILDING
- IMPERVIOUS AREA
- TOPOGRAPHIC CONTOUR – 5' INTERVAL
- TOPOGRAPHIC CONTOUR – 1' INTERVAL
- TREE LINE
- FENCE
- RAIL ROAD (METRO-NORTH)
- EDGE OF PAVEMENT / CURB
- EDGE OF WATER
- WETLANDS
- BEDROCK OUTCROP
- SPOT GRADE
- TREE – DECIDUOUS
- TREE – CONIFER
- PIPE
- RETAINING WALL
- SIGN
- CATCH BASIN
- OUTFALL
- STORM DRAIN LINE
- MANHOLE
- ROOF STORM DRAIN AND ASSOCIATED PIPING
- LIGHTPOLE
- TRANSFORMER
- DUST COLLECTOR
- COMPACTOR
- DUMPSTER (30 CY MAX.)
- USED OIL AST (DOUBLE WALL)
- CRYOGENIC LIQUID STORAGE TANK
- CAUSTIC AST
- DIRECTION OF FLOW
- EMERGENCY GENERATOR
- WASTEWATER DISCHARGE POINT CTSIU0078
- WASTEWATER MONITORING POINT CTSIU0078
- HAZARDOUS MATERIALS STORAGE

N

0 50 100 200 300

1" = 100'

NOTES

1. BASE MAP: ELECTRONIC DRAWING FILE (02752Basemap_011606.dwg) PROVIDED TO GZA ON ASHCROFT, INC. ON OCTOBER 7, 2025. NO ORIGINATION INFORMATION IS PROVIDED IN THE FILE. ALL FEATURES ARE APPROXIMATE.
2. PARCEL BOUNDARIES OBTAINED FROM CT DEEP ONLINE GIS DATABASE AND ARE APPROXIMATE.
3. STORM SEWER UTILITY INFORMATION APPROXIMATED BASED ON [ASHCROFT JPG].
4. THE PURPOSE OF THIS DRAWING IS TO LOCATE, DESCRIBE, AND REPRESENT THE POSITIONS OF VARIOUS STORMWATER POLLUTION PREVENTION FEATURES IN RELATION TO THE SUBJECT SITE. THIS DRAWING IS NOT CONSIDERED A LAND SURVEY.
5. FEATURE SYMBOLS ARE FOR GRAPHICAL PURPOSES ONLY AND DO NOT IMPLY SIZE, DIMENSIONS, ORIENTATION, ALIGNMENT, OR ANY OTHER MEASUREMENTS. ALL FEATURE LOCATIONS ARE APPROXIMATE.
6. TOTAL SITE ACREAGE (APPROXIMATE) = 31.5 ACRES.
7. TOTAL IMPERVIOUS ACREAGE (APPROXIMATE) = 17.83 ACRES.

NO.	ISSUE/DESCRIPTION	BY	DATE

ASHCROFT
250 EAST MAIN STREET
STRATFORD, CONNECTICUT 06497

STORMWATER POLLUTION PREVENTION PLAN
SITE LAYOUT

PREPARED BY:
GZA GeoEnvironmental, Inc.
Engineers and Scientists
www.gza.com

PREPARED FOR:
ASHCROFT, INC.

PROJ MGR:	CM	REVIEWED BY:	REK	CHECKED BY:	DJR
DESIGNED BY:	CS	DRAWN BY:	MJT	SCALE:	AS SHOWN
DATE:	1-16-2026	PROJECT NO.	05.0047407.05	REVISION NO.	

FIGURE
2
SHEET NO. 1 OF 1

ATTACHMENT D – POLLUTION PREVENTION TEAM ROLES AND RESPONSIBILITIES

STORMWATER POLLUTION PREVENTION TEAM

Title **Contact Number**	**Responsibilities**
VP/GM North America (203) 378-8281	• Responsible for review of the General Permit, all registration information, CTDEEP notices or requests, and applicable plans and specifications. • Signs the Certification statement included in Section 1 • Allocates the resources required to fully implement the SWPPP Plan.
Team Leader EHS Manager (203) 385-0553	• Pollution Prevention Team Leader (PPT) • Point of contact for regulatory authorities • Manages SWPPP implementation and execution • Updates the SWPPP as needed for accuracy and completeness • Evaluates industrial activities and potential for discharge of pollutants • Evaluates stormwater control measures and assignment of responsibilities • Manages site assessments and inspections • Evaluates Non-stormwater discharges • Manages the Monitoring Program • Manages record retention • Leads evaluation of resilience measures • Leads the corrective action process • Manages record retention • Conducts or arranges for routine audit of program effectiveness and conformance to all SWPPP requirements • Executes the corrective action process, as required
EHS Specialist (203) 385-0313 Facilities Manager (203) 385-0432 Shipping Manager (203) 385-0329 Maintenance Mechanic* Maintenance Mechanic* Maintenance Mechanic* Maintenance Mechanic* Fabrication Lead person*	• Implements and executes SWPPP elements, as assigned by the PPT • Completes SWPPP training, as assigned • Provides SWPPP training, as assigned • Executes the corrective action process, as required *Hourly employees are not assigned a company phone. Contact the Facilities Manager.

ATTACHMENT E – MONITORING PROGRAM DOCUMENTATION

Ashcroft Stormwater Sampling Results

	Benchmark	AVG	8/13/2013	2/19/2013	8/1/2012	11/16/2011*
O&G	**5.0 mg/L**	0.525	0.500	0.600	0.500	0.500
Sample pH	**5-9 S.U**	6.383	6.330	6.390	6.280	6.530
COD	**75 mg/L**	33.575	7.500	7.500	104.300	15.000
TSS	**90mg/L**	60.125	0.500	5.000	228.000	7.000
TP	**0.40 mg/L**	0.401	0.025	0.410	1.010	0.160
TKN	**2.39 mg/L**	1.570	0.860	1.040	3.540	0.840
No3-N	**1.10 mg/L**	0.595	0.530	0.560	0.440	0.850
Copper	**0.059 mg/L**	0.015	0.006	0.011	0.034	0.007
Zinc	**0.160 mg/L**	0.067	0.056	0.080	0.107	0.024
Lead	**0.076 mg/L**	0.009	0.001	0.001	0.032	0.001

***Met permit exemption status as of this sampling date.**

Updated 1/30/26 AMA

Parameter	2/27/2025	2/26/2024	1/19/2023	3/17/2022	3/18/2021	3/17/2020
Test Method	**9222D**	**9222D**	**9222D**	**9222D**	**Colilert 18**	**9222D**
Fecal Coliform (MPN/100mL)	2.0	16.0	3.0	2.0	24200.0	167.0

ATTACHMENT F – SECTOR-SPECIFIC MONITORING FORM

Connecticut
Department of Energy &
Environmental Protection

Permit #_____

General Permit for the Discharge of Stormwater Associated with Industrial Activity

Stormwater Monitoring Report

Sector AC – Electronic and Electrical Equipment and Components, Photographic and Optical Goods

Facility Information

Permittee Name: _____ Site Name: _____
Mailing Address: _____
Contact Person: _____ Title: _____
Business Phone: _____ EXT: ____ Email: _____
Site Address: _____
Receiving Water Body: _____ Permit #: _____
Primary SIC: _____ NAICS: _____
Discharges into an Impaired Waterbody: Yes ☐ No ☐ (If yes, complete the table on page 3)

Sample Information

Sample Location: _____ Person Collecting Sample: _____
Date/Time Collected: _____ Date of Previous Storm Event: _____
This report is for samples required: Annually ☐ Semi-Annually ☐ Other ☐
Check here if the sample contains snow or ice melt: ☐
Check here if a benchmark exceedance is solely due to background or off-site sources: ☐

Additional Information

Reminder: Paper Discharge Monitoring Reports (DMRs) may be used to submit monitoring results only until the Commissioner issues a Notice of Coverage to the permittee. After the Notice of Coverage is issued, all monitoring results must be submitted electronically through NetDMR, EPA's online DMR reporting system. The tables below are formatted to closely match the layout used in NetDMR to help facilitate the transition to electronic reporting.

Connecticut
Department of Energy &
Environmental Protection

Permit #_____

Sector AC – Monitoring Table

PARAMETER		QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	VALUE	UNITS			
Chemical Oxygen Demand 81017	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	75	mg/L		Semiannual	Grab
Total Oil and Grease 00556	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	5.0	mg/L		Semiannual	Grab
pH 00400	SAMPLE MEASUREMENT		*****					
	PERMIT REQUIREMENT	5.0 INST MIN	*****	9.0 INST MAX	mg/L		Semiannual	Grab
Solids, total suspended 00530	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	90	mg/L		Semiannual	Grab
Total Phosphorus (TP) 00665	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	0.40	mg/L		Semiannual	Grab
Total Kjeldahl Nitrogen (TKN) 00625	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	2.30	mg/L		Semiannual	Grab
Nitrate as Nitrogen (NO3-N) 00620	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	1.10	mg/L		Semiannual	Grab
Total Copper (Cu) 01042	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	0.059	mg/L		Semiannual	Grab
Total Lead (Pb) 01051	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	0.076	mg/L		Semiannual	Grab
Total Zinc (Zn) 01092	SAMPLE MEASUREMENT	*****	*****					
	PERMIT REQUIREMENT	*****	*****	0.160	mg/L		Semiannual	Grab

Connecticut
Department of Energy &
Environmental Protection

Permit #_____

Sector AC – Impaired Water Monitoring

Parameter	Frequency	Results (Units)	Test Method	Laboratory Name

Connecticut
Department of Energy &
Environmental Protection

Permit #_____

Statement of Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

"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 Conn. Gen. Stat., pursuant to Section 53a-157b of the Conn. Gen. Stat., and in accordance with any other applicable statute."

_____ _____
Signature of Permittee Date

_____ _____
Name of Permittee Date

_____ _____
Signature of Preparer Date

_____ _____
Name of Preparer Date

Please email all completed forms to:

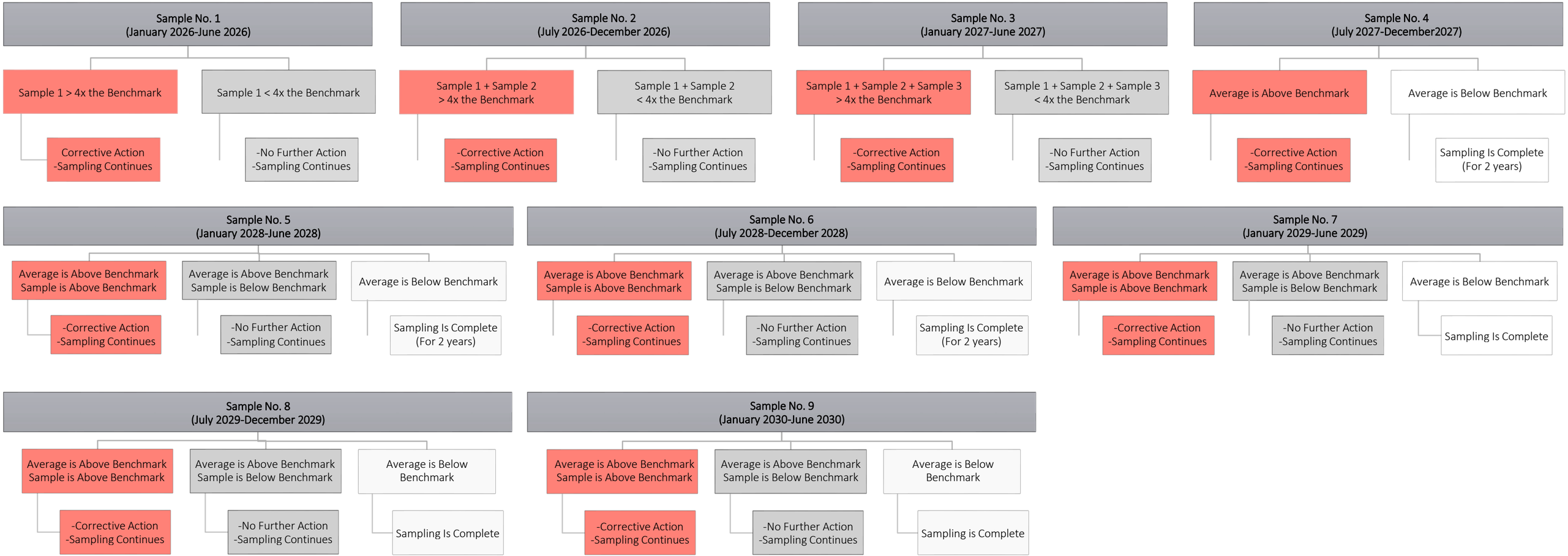
Deep.StormwaterIndustrial@ct.gov

Appendix L
DMR No Data Indicator Codes

Purposes:
No Data Indicator Codes (NODI) codes are used on Discharge Monitoring Reports (DMRs) to explain why a specific data value or the DMR cannot be submitted for a given parameter or period. These codes must be used by facilities with NPDES permits to indicate various reasons for missing data, such as operational issues, weather conditions, or sampling failures. Permittees must use the appropriate NODI code on the DMR from the list below.

NODI Code	NODI Code Description
1	Wrong Flow
2	Operation Shutdown
3	Special Report Attached
4	Discharge to Lagoon/Groundwater
5	Frozen Conditions
6	State-specific No Data Indicator – Invalid
7	No Influent
8	Other (See Comments)
9	Conditional Monitoring - Not Required This Period
A	General Permit Exemption
B	Below Detection Limit/No Detection
C	No Discharge
D	Lost Sample/Data Not Available
E	Failed to Sample/Required Analysis Not Conducted
F	Insufficient Flow for Sampling
G	Sampling Equipment Failure
H	Invalid Test
I	Land Applied
J	Recycled - Water-Closed System
K	Natural Disaster
L	DMR Received but not Entered
M	Laboratory Error
N	Not Constructed
P	Laboratory Error or Invalid Test
Q	Not Quantifiable
R	Administratively Resolved
S	Fire Conditions
T	Environmental Conditions - Monitoring Not Possible
V	Weather Related
W	Dry Lysimeter/Well
X	Parameter/Value Not Reported
Y	State-specific No Data Indicator – Valid

Appendix H Guidance for Semi-annual Benchmark Monitoring and Corrective Action



ATTACHMENT G – ROUTINE INSPECTION FORM

ASHCROFT®
Trust the shield.®

MONTHLY INSPECTION LOG

STORMWATER INSPECTION LOG
ASHCROFT, INC.

DATE:_____ **INSPECTOR:**_____

The inspector must conduct a complete walk-around of the entire facility and complete this form on a monthly basis. Refer to the site map for drainage area limits.

Check all that apply:

	Yes	**No**
Staining or other contaminants are present on any exterior surfaces?	[ ]	[ ]
Have any spills greater than 5-gal not been properly reported?	[ ]	[ ]
Any materials stored outside appear not to be clean, drained, covered?	[ ]	[ ]
Any dumpsters un-covered or leaking?	[ ]	[ ]
Any leaking or staining observed near compactors?	[ ]	[ ]
Any accumulation in Scrap Metal Dumpster containment?	[ ]	[ ]
Any particulate build-up near dust collectors?	[ ]	[ ]
Any staining or accumulation of material on roof?	[ ]	[ ]
Any spill kits missing or not in proper locations or opened?	[ ]	[ ]
Any catch basins full of sediment or with indications of spills?	[ ]	[ ]

Remarks/Corrective Action Taken (any YES answer requires corrective action):

_____

_____

SIGNATURE OF INSPECTOR:_____

ATTACHMENT H – VISUAL ASSESSMENT FORM

ASHCROFT
Trust the shield.

Stormwater Quarterly Visual Assessment Form

Year:	Oct 1 - Dec 31	Jan 1 – Mar 31	Apr 1 – Jun 30	Jul 1 – Sep 30
Date:				
Start of Discharge:				
Time of Sampling:				
Storm Magnitude (in.):				
Previous Storm Event:				
Uncontaminated Rainfall pH (SU):				
Discharge Temp.:				
Discharge pH:				
Analytical Sampling Event:	Y / N	Y / N	Y / N	Y / N
Visual Assessment: Inspect the stormwater sample in a clean, clear glass or plastic container in a well-lit area and record characteristics of the sample for the presence of the following water quality indicators.				
Color:				
Odor:				
Clarity:				
Floating solids:				
Settled solids:				
Suspended solids:				
Foam:				
Oil sheen:				
Other indicators of stormwater pollution:				
Sampler Signature:				

Comments:_____

ATTACHMENT I – SEMI-ANNUAL COMPREHENSIVE INSPECTION FORM

ASHCROFT®
Trust the shield.®

Stormwater Semi-Annual Inspection Form

Inspector's Name(s): _____ Inspection Date: _____

_____ Storm Event: Yes _____ No _____

Potential Pollutant Source	Good Housekeeping		Preventative Maintenance		Spill Prevention		Problems Identified	Corrective Actions Taken & Date
	Pass	Fail	Pass	Fail	Pass	Fail		
Loading Docks								
Roof Vents								
Scrap Metal Dumpsters								
Used Oil Tanks								
Trash Compactor								
Paper Dumpster								
Cardboard Compactor								
Office Paper Dumpster								
Scrap Wood Dumpster								
Misc. Equipment Storage								
Misc. Maintenance Rolloffs								
Embankment Area								
Dust Collectors								
Catch Basins								

Review the SPPP, were there any revisions required? _____ Yes _____ No If yes, what date were the revisions completed

Have we made any changes to the facility or in our work practices that have an impact on storm water? _____ Yes _____ No

If yes, have they been properly documented? _____ Yes _____ No

ATTACHMENT J – MONITORING, INSPECTION, AND REPORTING SCHEDULE

MONITORING, INSPECTION, AND REPORTING SCHEDULE		**EFFECTIVE: JANUARY 1, 2026**		
Type	**Frequency**	**Schedule[2]**		**Reporting Due Date[3]**
Routine Site Inspection[4]	Monthly	☐January ☐February ☐March ☐April ☐May ☐June	☐July ☐August ☐September ☐October ☐November ☐December	Monthly[5]
Visual Assessment Monitoring[6, 7]	Quarterly	☐January 1 to March 30; ☐ April 1 to June 30; ☐July 1 to September 30; and ☐ October 1 to December 31		Quarterly[5]
Benchmark Monitoring [6, 8]	Semiannually[9]	☐January 1 to June 30; and ☐ July 1 to December 31		☐July 30; and ☐January 30 following each calendar year
Aquatic Toxicity Monitoring[6]	One-time Permit Year 1	Schedule with a benchmark monitoring event above in 2026		☐July 30; or ☐January 30
Comprehensive Site Inspection[10]	Semiannually	☐January 1 to June 30; and ☐ July 1 to December 31		Semiannually [5]
Impaired Waters Monitoring	*Annually*	*Not Required*		*Not Required*
Annual Report	Annually	☐ January 1 to December 31		No later than April 15 following each calendar year[11]

Note(s):

1. The first monitoring period under the 2025 General Permit begins on January 1, 2026. If the five-year permit is administratively continued, all monitoring requirements remain in effect at their original (i.e., year 1) frequency.
2. Semi-annual monitoring events must be separated by at least 30 days.
3. Discharge Monitoring Report (DMR) submittal to CTDEEP is due within 30 days after the end of each monitoring period.
   a. Submit paper DMRs via email to DEEP.StormwaterIndustrial@ct.gov until a Notice of Coverage is received. Then follow CTDEEP instructions on how to transition to the federal online platform NetDMR.
   b. If samples are collected during multiple storm events within a scheduled monitoring period, the additional sampling results must be submitted with the DMR as an attachment.
   c. No Data Indicator Codes (NODI) codes provided in Appendix L of the General Permit are used on a DMR to explain why a specific data value or the DMR cannot be submitted. A copy is included in Attachment F.
4. At least once each calendar year, conduct the inspection during a period when a stormwater discharge is occurring.
5. File completed inspection forms on-site and accessible. Findings will be summarized in the Annual Report.
6. Monitoring is performed at Outfall 001. A sector AC Monitoring Form is included in Attachment F.

7. If it snows at least once over a period of four quarters, at least one assessment must capture snowmelt discharge, if feasible.
8. Once all benchmark monitoring requirements are fulfilled for the permit term, notify CTDEEP via email (reference 3.a.)
9. Appendix H of the General Permit provides “Guidance for Semi-annual Benchmark Monitoring and Corrective Action”.
10. Conduct during a rainfall event, if possible
11. Submit to DEEP.Stormwater.Industrial@ct.gov entering “ATTN: Industrial Stormwater GP” in the subject line.

ATTACHMENT K– EMPLOYEE TRAINING MATERIALS

Stormwater Pollution Prevention Plan Training

Ashcroft, Inc.

2025

Training Topics

- Regulatory Summary / Background
- Pollution Prevention Team
- ***Drainage Areas and Discharge Points***
- Potential Pollutant Sources
- Control Measures
- Facility Inspections
- Stormwater Monitoring
- Reporting
- **Corrective Action**
- Recordkeeping
- Review
- Questions

ATTACHMENT L – CORRECTIVE ACTION DOCUMENTATION

Connecticut
Department of Energy &
Environmental Protection

Appendix G
Corrective Action Measure Requirements & Waiver Request

Purpose:

A qualified professional, as defined in the general permit, trained and designated by the permittee, will complete this form as soon as they are made aware of a condition triggering a Corrective Action Measure (CAM). The permittee must keep this form and any related documentation in the Stormwater Pollution Prevention Plan.

Violation of an Effluent Limitations Guideline:

Violation of an Effluent Limit Guideline (ELG) requires immediate reporting in accordance with the permit terms and conditions. The permittee may attach this form when completing the online notification of noncompliance. See Sections 4.6 and 4.7 of the general permit for further reporting requirements. The Noncompliance Reporting portal is located at:

https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements

Request for an Extension or Waiver:

The permittee may also use this form to request an extension to timelines for implementing Corrective Action Measure Level 1, 2, or 3 as needed, or to request a Waiver from further Corrective Action Measures and/or monitoring. A request, and copy of the this form along with supporting documentation may be submitted to DEEP at Stormwater Staff DEEP.Stormwaterindustrial@ct.gov. Retain a copy of all requests and communication in the SWPPP.

Connecticut
Department of Energy &
Environmental Protection

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Section 1. Corrective Action Measure Documentation Submission Type	
General Corrective Action Measure Documentation	☐
Violation of an Effluent Limitations Guideline	☐
Unauthorized spill, leak, release, or discharge	☐
Request for an Extension to CAM Timelines	☐
Request for a Waiver from Further Corrective Action Measures and/or Monitoring[2]	☐

Section 2. Corrective Action Measure General Information		
Permittee Information	**Permittee Name**	
	Site Name	
	Site Address	
	Site City/State/Zip	
	Permit Number (CTR05)	
Site Contact (Person Filling out this Form)	**Name (first & last)**	
	Title	
	Email Address	
	Phone Number	
Date/ Time/ Location	**Location of Incident on Site**	
	Time of Condition Started	
	Date of Condition Started	

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Section 3. Corrective Action Triggering Condition Information

Triggering Condition	Description	Condition Occurring? (Check Box)
4 Event Average Exceeds the Benchmark Threshold (or Mathematical Equivalent)	A discharge exceeds an applicable benchmark threshold after 4 consecutive semi-annual measurements	☐
Effluent Limit Exceedance	A discharge exceeds a numeric effluent limitation guideline	☐
Unauthorized release or discharge	Spill, leak, release, or discharge of non-stormwater not authorized by this permit or another permit	☐
Inconsistency with an Applicable Total Maximum Daily Load and Wasteload Allocation	A discharge is inconsistent with the assumptions and requirements of an Applicable Total Maximum Daily Load and its Wasteload Allocation	☐
Control Measure Not Stringent Enough to Meet Water Quality Standards	A required control measure is not stringent enough for a stormwater discharge to be controlled as necessary such that the receiving water will meet applicable water quality standards	☐
Control Measure Never Designed, Installed, Implemented, or Maintained	A required control measure was never designed, installed, or implemented	☐
Change in Design, Operation, or Maintenance at a Facility	Construction or a change in the design, operation, or maintenance at a facility that significantly changes the nature or increases the quantity of pollutants discharged	☐
Visual Assessment Shows Evidence of Pollution	Color, odor, floating solids, settled solids, suspended solids, or foam observed in discharge water	☐
Other Corrective Actions (as Required by the Commissioner)	The Commissioner may utilize enforcement discretion to require additional corrective actions in response to permit violations	☐

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Please provide a description of the event or the request being made to the Commissioner:

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Section 4. Corrective Action Measure Select the appropriate level and describe the actions taken		
☐ **Corrective Action Level 1**	Immediate Actions (Within 1-2 Days)	
	Subsequent Actions (Within 14-60 Days)	
	Extension (Greater than 60 Days)	
	Follow-up sample, if applicable (include date, discharge location, and parameter)	
☐ **Corrective Action Level 2**	Immediate Actions (Within 1-2 Days)	
	Subsequent Actions (Within 14-60 Days)	
	Extension (Greater than 60 Days)	
	Follow-up sample, if applicable (include date, discharge location, and parameter)	
☐ **Corrective Action Level 3**	Immediate Actions (Within 1-2 Days)	
	Subsequent Actions (Within 14-60 Days)	
	Extension (Greater than 60 Days)	
	Follow-up sample, if applicable (include date, discharge location, and parameter)	

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Section 5. Additional Information (check all that apply)	
☐ **Follow-up photographs**	**Please describe any photographs taken and attach them to the end of this document.**
☐ **Request for an extension**	**Please describe the request for an extension for CAM implementation. Please see the permit for criteria applicable to exemptions.**
☐ **Request for a waiver**	**Please describe the request for a waiver from further corrective action measures and/ or monitoring. Please see the permit for criteria applicable to waivers.**
Certification	I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate, and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the Regs. Conn. State Agencies, pursuant to section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute.

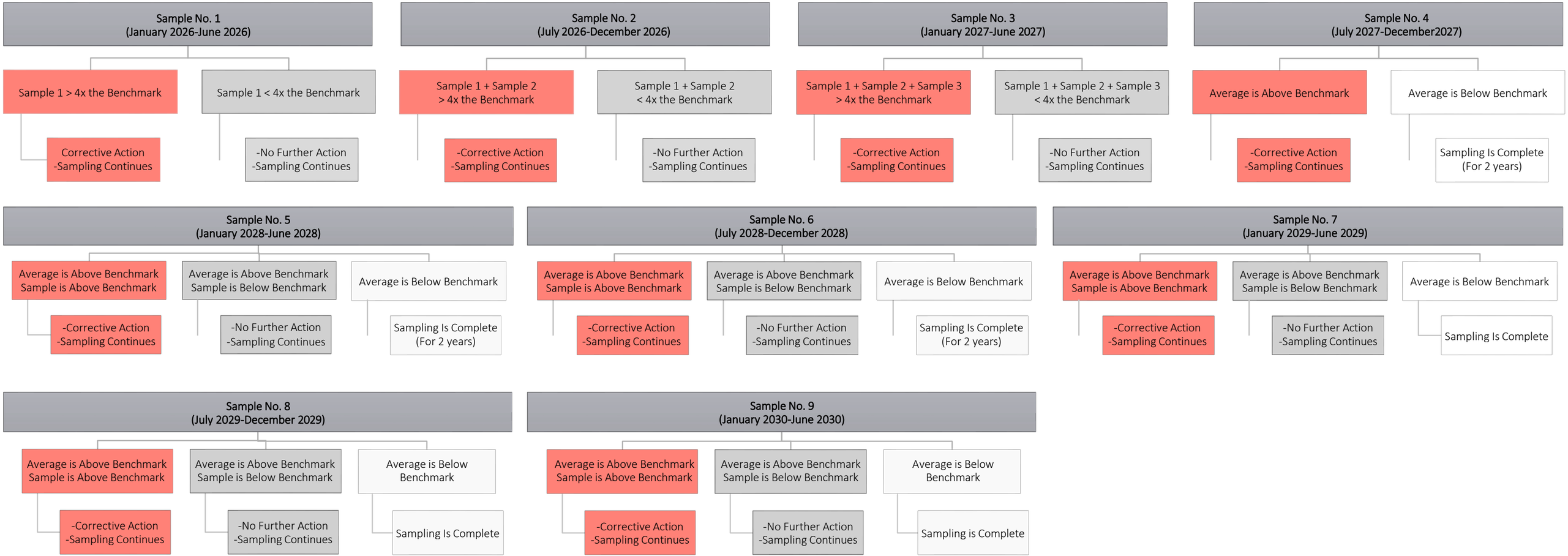
Certifier Name:	Click or tap here to enter text.	Certifier Title:	Click or tap here to enter text.
Certifier Signature:		Date:	Click or tap here to enter text.
Site/Facility Name and Address:	Click or tap here to enter text.	General Permit No.:	Click or tap here to enter text.

Appendix L
DMR No Data Indicator Codes

Purposes:
No Data Indicator Codes (NODI) codes are used on Discharge Monitoring Reports (DMRs) to explain why a specific data value or the DMR cannot be submitted for a given parameter or period. These codes must be used by facilities with NPDES permits to indicate various reasons for missing data, such as operational issues, weather conditions, or sampling failures. Permittees must use the appropriate NODI code on the DMR from the list below.

NODI Code	NODI Code Description
1	Wrong Flow
2	Operation Shutdown
3	Special Report Attached
4	Discharge to Lagoon/Groundwater
5	Frozen Conditions
6	State-specific No Data Indicator – Invalid
7	No Influent
8	Other (See Comments)
9	Conditional Monitoring - Not Required This Period
A	General Permit Exemption
B	Below Detection Limit/No Detection
C	No Discharge
D	Lost Sample/Data Not Available
E	Failed to Sample/Required Analysis Not Conducted
F	Insufficient Flow for Sampling
G	Sampling Equipment Failure
H	Invalid Test
I	Land Applied
J	Recycled - Water-Closed System
K	Natural Disaster
L	DMR Received but not Entered
M	Laboratory Error
N	Not Constructed
P	Laboratory Error or Invalid Test
Q	Not Quantifiable
R	Administratively Resolved
S	Fire Conditions
T	Environmental Conditions - Monitoring Not Possible
V	Weather Related
W	Dry Lysimeter/Well
X	Parameter/Value Not Reported
Y	State-specific No Data Indicator – Valid

Appendix H Guidance for Semi-annual Benchmark Monitoring and Corrective Action



ATTACHMENT M - 2025 NPDES GENERAL PERMIT (CTR050000)

Ashcroft maintains an electronic copy of the 2025 General Permit available for the Pollution Prevention Team to review. In addition, the link below will open the General Permit.

2025-Industrial-Sormwater-General-Permit.pdf