Connecticut
Department of Energy &
Environmental Protection
WATER PERMITTING & ENFORCEMENT

National Pollutant Discharge Elimination System
General Permit for the Discharge of Stormwater Associated with Industrial Activities

General Permit No.: CTR050000

Stormwater Pollution Prevention Plan (SWPPP)

October 2025

Disclaimer
This Framework is provided by CT DEEP for guidance only and does not replace or supersede any statutory or regulatory requirements. The enforceable obligations of regulated facilities are established solely by the Industrial Stormwater General Permit (IGP) and applicable federal and state laws. In the event of any conflict or inconsistency, the provisions of the IGP control. Use of this Framework does not create new requirements, confer rights, or provide a defense for noncompliance. Permittees are responsible for reviewing the IGP in its entirety and ensuring full compliance.

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Connecticut
Department of Energy &
Environmental Protection
WATER PERMITTING & ENFORCEMENT

DRAFT

Stormwater Pollution Prevention Plan

For:

Rand-Whitney Containerboard, L.P.
370 Route 163
Montville, Connecticut
860-848-1900

Permit No: CTR05####

Version	Date	Author
1.0	__ __/ __ __ / __ __ __ __	CJE Environmental LLC
	__ __/ __ __ / __ __ __ __	
	__ __/ __ __ / __ __ __ __	
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Preparation of this Plan

This Plan was prepared using the Connecticut Department of Energy and Environmental Protection (CT DEEP) Industrial Stormwater Pollution Prevention Plan (SWPPP) Framework to comply with the 2025 National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Stormwater Associated with Industrial Activities (hereinafter referred to as the "Industrial General Permit," "the permit," or "the IGP").

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

The SWPPP must be retained on site at the facility that generates the stormwater discharge, along with a copy of the IGP. The SWPPP must be available for review during inspections by the Commissioner or as otherwise requested by the Commissioner.

Where to Find More Information

The permit can be found on the CT DEEP website: https://portal.ct.gov/deep/water-regulating-and-discharges/stormwater/industrial-stormwater-gp.

Questions regarding the Industrial Stormwater Program can be submitted via e-mail to the following address: DEEP.StormwaterIndustrial@ct.gov

Section 1: Certifications Contained in the SWPPP

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:	Kathryn M. Pflugbeil	Certifier Title:	Technical Manager
Certifier Signature:		Date:	Click or tap here to enter text.
Site/Facility Name and Address:	Rand-Whitney Containerboard, L.P. 370 Route 163 Montville, CT 06353	General Permit No.:	TBD

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 Rand-Whitney Containerboard, L.P. 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 the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute.

Certifier Name:	Christopher J. Ecsedy	Certifier Title:	Member, CJE Environmental LLC
Certifier Signature:		Date:	Click or tap here to enter text.
Site/Facility Name and Address:	Rand-Whitney Containerboard, L.P. 370 Route 163 Montville, CT 06353	General Permit No.:	TBD

Certification of Non-stormwater Discharges

I certify that, in my professional judgment, the stormwater discharge from the site or facility known as Rand-Whitney Containerboard, L.P. 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 J. Ecsedy	Certifier Title:	Member, CJE Environmental
Certifier Signature:		Date:	Click or tap here to enter text.
Site/Facility Name and Address:	Rand-Whitney Containerboard, L.P. 370 Route 163 Montville, CT 06353	General Permit No.:	TBD

Certification of an Engineered Stormwater Discharge System

Instructions: Any evaluation, construction, or modification of the design of an engineered stormwater drainage system, as defined in the Connecticut Stormwater Quality Manual, requires certification by a Professional Engineer. The certification and supporting documentation must be kept in the SWPPP. The official certification statement must be written in accordance with the IGP.

Any Additional Certifications

Instructions: Any additional certifications and supporting documentation must be kept in the SWPPP. Official certification statements must be written in accordance with the IGP.

Additional Permits

Rand-Whitney Containerboard, L.P. (Rand-Whitney) generates wastewater discharges that are covered under the following permit:

1. Pretreatment Permit SP0002032
2. SIU General Permit CTSIU0046
3. Comprehensive General Permit – Fire Protection Water

Section 2: Pollution Prevention Team

Team Member:	**Kathryn Pflugbeil**
Title:	Technical Manager
Phone:	860-425-3711
Shift (if applicable):	First
Responsibilities:	(Ex: Maintains SWPPP, Oversees Employee Training, etc.)
Team Leader; Coordinate plan revisions; stormwater monitoring and analysis; Signature authority; submission of documents to regulatory agencies; employee training.	

Team Member:	**Ken Rogers**
Title:	Utilities Manager
Phone:	860-367-6350
Shift (if applicable):	First
Responsibilities:	(Ex: Maintains SWPPP, Oversees Employee Training, etc.)
Coordinate and review CSCE inspections; maintain records on site; complete site inspections and coordinate/collect stormwater monitoring and analysis.	

Section 3: Facility/Site Description and Contact Information

Contact Information/Responsible Parties

Facility Operator(s):
Name: Rand-Whitney Containerboard, L.P.
Address: 170 Route 163
City, State, Zip Code: Montville, CT 06353
Telephone Number: 860-848-1900
Email address: info@rwcb.com

Facility Owners(s) if different than operator:
Name:
Address:
City, State, Zip Code:
Telephone Number:
Email address:

Site Contact if different than operator:
Name: Kathryn Pflugbeil
Address: 170 Route 163
City, State, Zip Code: Montville, CT 06353
Telephone Number: 860-848-1900
Email address: Kathyp@rwcb.com

SWPPP Contact(s):
SWPPP Contact Name (Primary): Kathryn Pflugbeil
Telephone Number: 860-485-3711
Email address: Kathyp@rwcb.com
SWPPP Contact Name (Backup): Ken Rogers
Telephone Number: 860-367-6350
Email address: Krogers@rwcb.com

Facility/Site Description

Rand-Whitney Containerboard (RWCB) operates a recycled fiber linerboard mill located on Route 163 and Robertson Road, in Montville, Connecticut. Operations include: warehouse storage of raw materials (Old Corrugated Containers) and finished goods (linerboard), pulping, cleaning of paper stock, paper machining and drying of up to 900 tons per day of linerboard. A cogeneration plant provides steam and electricity to the mill and has been in operation since 2005. RWCB discharges stormwater from its facility to Oxoboxo Brook via discrete discharges and sheet flow from stormwater collection systems including catch basins, roof drains and other paved and unpaved surface areas.

Facility/Site Name: Rand-Whitney Containerboard, L.P.	
Street/Location: 170 Route 163	
City: Montville	State: CT ZIP Code: 06353
Primary regulated industrial sector and its description: Sector A Timber Products	
Primary four-digit Standard Industrial Classification (SIC) code and its description: 2631 – Paperboard Mills	
Primary six-digit North American Industry Classification System NAICS code and its description: 322130 – Paperboard Mills	
Co-located Industrial Activity(s) SIC code(s), NAICS code(s), Sector(s) and Subsector(s): NA	
Is your facility presently inactive and unstaffed, and are there no industrial materials or activities exposed to stormwater? ☐ Yes ☒ No	
Latitude/Longitude	
Latitude:	Longitude:
41.45179 º N (decimal degrees)	-72.13552. º W (decimal degrees)

Water Quality Classification

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: **Class B**
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. NA
If yes, which parameters and sample frequency apply? NA

Section 4: Monitoring Program and Relevant Procedures

Instructions: Describe the monitoring program and sampling data for stormwater discharges at the site, in accordance with the "Monitoring" section of the IGP. Existing permitted facilities must summarize all stormwater discharge sampling data collected at the facility during the previous permit term. The summary must include a narrative description (and may include data tables/figures) that adequately summarizes the collected sampling data to support identification of potential pollution sources at their facility. New dischargers and new sources must provide a summary of any available stormwater data they may have.
The stormwater monitoring program during the previous term of the permit involved collecting samples at four stormwater outfalls, designated as DSG-001, DSG-003, and DSG-006, and DSG-008. Rand-Whitney monitored these discharges for benchmark parameters and met these benchmarks prior to the 2021 stormwater renewal (date of previous permit). As such, Rand-Whitney does not have a summary of data for this time period.

Discharge Points

Instructions: Discharge points must be sequentially numbered (001, 002, 003…010, etc.) and given a descriptor (e.g., Wet Deck Area) in the SWPPP (e.g., 001 Wet Deck Area, 002 Logging Area).

Location of Discharge Point	Sequential Number & Descriptor	Description of General Industrial Activities in Drainage Area	Description of Control Measures in Drainage Area	Description of Exposed Materials in Drainage Area	Estimate of Runoff Coefficient of Drainage Area
Outfall to Oxoboxo Brook	001	• Vehicle Fueling • Diesel Storage Tank and Transfers • No. 2 Fuel Oil Tank (Inactive) • Mill Reject Rolloffs • Tails Rolloffs (under cover) • Containerboard Recycle Hopper • Equipment Storage • Vehicle traffic • Propane Storage Tank • Wood Storage Rolloff	• Housekeeping • Employee training • Catch basins/ Cath basin cleaning • Sediment Tank • Secondary Containment Systems • Paved Area sweeping • Equipment Maintenance	• Diesel/Fuel Oil (in secondary containment) • Tailings and Mill Reject Rolloffs • Propane • Wood Storage Rolloff •	0.90
Outfall to Oxoboxo Brook	002	None – Primarily Roof Area	NA	None	0.90
Outfall to Oxoboxo Brook	003	• Vehicle Traffic • Starch Silo (bermed) • Water Surge Basin • Loading Dock • Scrap Metal Dumpsters (under roof) • Salt/Sand Storage • Trailer Parking	• Housekeeping • Employee training • Secondary Containment Systems • Paved Area sweeping • Equipment Maintenance	• Starch Silo • Process water Overflow Basin • Scrap Metal Dumpsters (under roof) • Salt/Sand Storage • Trailer Parking	0.85

Outfall to Oxoboxo Brook	004	• Vehicle Traffic • Material Loading	• Housekeeping • Employee training • Paved Area sweeping • Equipment Maintenance	None	0.85
Outfall to Oxoboxo Brook	005	• Vehicle Traffic • Material Loading/Loading Dock • Propane Storage	• Housekeeping • Employee training • Catch Basin Cleaning • Paved Area sweeping • Equipment Maintenance	• Propane Storage	0.90
Outfall to Oxoboxo Brook	006	• Vehicle Traffic • Fuel and Ammonia Deliveries/ Transfers • Heat Recovery Systems (Glycol)	• Housekeeping • Employee training • Catch Basin Cleaning • Paved Area sweeping • Equipment Maintenance	None	0.90
Outfall to Oxoboxo Brook	007	• Vehicle Traffic • Empty Rolloff Storage Area • Salt/Sand • Trailer Storage	• Housekeeping • Employee training • Catch Basin Cleaning • Paved Area sweeping	• Salt/Sand (covered)	0.90
Outfall to Oxoboxo Brook	008	• Vehicle Traffic • No. 2 Fuel Oil Storage • Ammonia Storage • Gas Compressor • Loading Areas	• Housekeeping • Employee training • Catch Basin Cleaning • Sediment Tank Cleaning • Paved Area sweeping	• No. 2 Fuel Oil (in Secondary Containment) • Ammonia (in Secondary Containment)	0.65
Outfall to Oxoboxo Brook	009	• Vehicle Traffic	• Housekeeping • Employee training • Catch Basin Cleaning • Paved Area Sweeping	None	0.90

Outfall to Oxoboxo Brook	010	• Vehicle Traffic • Loading Dock • Trailer Parking	• Housekeeping • Employee training • Catch Basin Cleaning • Paved Area Sweeping	None	0.80

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 001		
Type(s) of monitoring performed:	Benchmark, Aquatic Tox., Impaired Water		
Locations where samples are collected:	Rip-Rap Plunge Pool		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
26" RCP	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-coli	
Provide sampling frequency for Impairments, if applicable		Annual	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 002		
Type(s) of monitoring performed:	NA – Substatially Identical to DSG 001		
Locations where samples are collected:	Outfall along bank		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
6-inch Concrete	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-Coli	
Provide sampling frequency for Impairments, if applicable		NA – Substantially Identical	

Instructions: For each outfall, the permittee must provide the following information:		
Outfall Identifier:	DSG 003	
Type(s) of monitoring performed:	Benchmark, Aquatic Tox., Impaired Water	
Locations where samples are collected:	Break in Curb	
Select the type of conveyance, outfall, or channelized flow:	☐ Pipe ☐ Catch Basin ☐ Swale	
	☒ Other: Break in Curbing	
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)	☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody	
If selected Separate Storm Sewer System above, name the system:	NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:	Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?	☒ Yes	☐ No
If yes, what is the impairment(s)?	Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?	CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):	E-coli	
Provide sampling frequency for Impairments, if applicable	Annual	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 004		
Type(s) of monitoring performed:	NA – Substatially Identical to DSG 006		
Locations where samples are collected:	Outfall to Oxoboxo Brook		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
4-inch PVC	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-Coli	
Provide sampling frequency for Impairments, if applicable		NA – Substantially Identical	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 005		
Type(s) of monitoring performed:	NA – Substatially Identical to DSG 006		
Locations where samples are collected:	Outfall to Oxoboxo Brook		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
12-inch RCP	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-Coli	
Provide sampling frequency for Impairments, if applicable		NA – Substantially Identical	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 006		
Type(s) of monitoring performed:	Benchmark, Aquatic Tox., Impaired Water		
Locations where samples are collected:	Catch basin upstream of outfall		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
18-inch RCP	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-coli	
Provide sampling frequency for Impairments, if applicable		Annual	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 007		
Type(s) of monitoring performed:	NA – Substatially Identical to DSG 001		
Locations where samples are collected:	Catch basin upstream of outfall		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
12-inch RCP	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-Coli	
Provide sampling frequency for Impairments, if applicable		NA – Substantially Identical	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 008		
Type(s) of monitoring performed:	Benchmark, Aquatic Tox.		
Locations where samples are collected:	Catch basin upstream of outfall		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
30-inch RCP	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-coli	
Provide sampling frequency for Impairments, if applicable		Annual	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 009		
Type(s) of monitoring performed:	NA – Substatially Identical to DSG 003		
Locations where samples are collected:	Catch basin upstream of outfall		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
6-inch Concrete (est.)	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-Coli	
Provide sampling frequency for Impairments, if applicable		NA – Substantially Identical	

Instructions: For each outfall, the permittee must provide the following information:			
Outfall Identifier:	DSG 010		
Type(s) of monitoring performed:	NA – Substatially Identical to DSG 003		
Locations where samples are collected:	Catch basin upstream of outfall		
Select the type of conveyance, outfall, or channelized flow:	☒ Pipe	☐ Catch Basin	☐ Swale
8-inch RCP	☐ Other:		
Is the discharge subject to effluent limitation guidelines (ELGs) (see IGP)		☐ Yes	☒ No
To what system or receiving water does your stormwater runoff discharge? If you answer "MS4" or "wetlands", the following questions related to impaired water are not applicable	☐ Storm Sewer System (MS4) ☐ Wetlands ☒ Waterbody		
If selected Separate Storm Sewer System above, name the system:		NA	
If applicable, name receiving surface water, watershed, or waterbody (include waterbody ID) for each discharge:		Oxoboxo Brook, CT3004-00_01	
Is receiving water impaired?		☒ Yes	☐ No
If yes, what is the impairment(s)?		Habitat for Fish, Other Aquatic Life and Wildlife – Cause Unknown	
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?		CT Statewide Bacterial TMDL	
Identify the pollutant(s) causing the impairment(s):		E-Coli	
Provide sampling frequency for Impairments, if applicable		NA – Substantially Identical	

Changes or Additions to Discharge Points

Instructions: Permittees must notify the Commissioner of changes to the number or location of discharge points, either of which may require monitoring to be restarted and/or the SWPPP to be revised in accordance with the IGP.		
List changes below:	Commissioner Notified?	
	☐ Yes	☐ No
	☐ Yes	☐ No

List of all Monitoring Program Requirements

Instructions: The Permittee must maintain a list of all required monitoring for their facility. This permit has six types of required monitoring:

- Benchmark monitoring
- Additional monitoring
- Effluent limits monitoring
- Aquatic toxicity
- Impaired waters monitoring
- Other monitoring as required by the Commissioner

Monitoring requirements for each sector are listed in the IGP. The permittee may copy the table in their sector-specific monitoring requirements (pursuant to the IGP), adjusting only for any impaired waters monitoring requirements.

Benchmark, Aquatic Toxicity, Impaired Water

Monitoring Program Schedules and Procedures

Instructions: Monitoring schedules and procedures for each sector are listed in tables in the permit. Monitoring procedures. The permittee may copy the monitoring table, which lists the monitoring schedule and procedures, adjusting only for any impaired waters monitoring requirements as needed. Any exemptions earned must be clearly indicated, and the list of required parameters must be adjusted accordingly.

Rand-Whitney will monitor outfalls DSG 001, DSG 003, DSG 006, and DSG 008 in accordance with IGP. The following parameters will be monitored:

Parameter	Frequency	Threshold (mg/l)
Chemical Oxygen Demand	Semi-Annual*	75
Total Oil and Grease	Semi-Annual*	5
pH	Semi-Annual*	5.0-9.0 SU
Total Suspended Solids	Semi-Annual*	90
Nitrate as Nitrogen	Semi-Annual*	1.10
Total Phosphorus	Semi-Annual*	0.40
Total Kjeldahl Nitrogen	Semi-Annual*	2.30
Total Copper	Semi-Annual*	0.059
Total Lead	Semi-Annual*	0.176
Total Zinc	Semi-Annual*	0.160
Total Arsenic	Annual in 1st and 2nd year of permit term.	NA
Aquatic Toxicity	Once during permit term	NA
E-Coli	Annual	NA

Stormwater outfall monitoring for benchmark thresholds will be conducted semiannually. The two (2) semiannual monitoring periods are from January 1st to June 30th and from July 1st to December 31st. Semi-annual monitoring events shall be separated by at least 30 days.

If the average of four (4) consecutive measurements for a parameter does not exceed the benchmark threshold, Rand-Whitney earns a temporary monitoring exemption for that parameter and can discontinue monitoring for that parameter for a maximum of two years. An exemption for sample pH cannot be earned until exemptions for all other parameters are met.

All pollutant parameters will be tested according to methods prescribed in Title 40, Code of Federal Regulations (CFR), Part 136. Laboratory analyses will be consistent with Connecticut Reasonable Confidence Protocols.

The following is a summary of the monitoring procedure to be followed by Rand-Whitney.

SITE CONTACT

Technical Manager
Kathryn Pflugbeil, 860-485-3711

SAMPLE LOCATIONS

The stormwater discharge locations that require monitoring under the General Permit are DSG 001, DSG 003, DSG 006, and DSG 008. These locations are depicted on the Site on the Site Plan.

WHEN TO SAMPLE

General Monitoring must be performed semi-annually during the time periods specified above.

Sampling may also need to continue for a subset of parameters based on whether or not benchmark values are exceeded. The sampling should begin at the facility within the first 30 minutes of discharge during a storm that follows at least 72 hours of no discharge. There is no minimum rainfall quantity required for stormwater sampling. Snow or ice may be present at the time of sampling.

SAMPLE PARAMETERS

See table above.

REQUIRED EQUIPMENT

- Containers as provided by the selected laboratory(ies) for the required parameters
- Pole (scoop) sampler, as necessary

- 5 gallon buckets
- pH meter
- Cooler with Ice

HOW TO SAMPLE

- Initiate grab sample collection from the discharge point identified in this plan within 30 minutes of the start of a storm event discharge.
- Wear nitrile gloves provided when collecting the samples.
- Do not overfill pre-preserved sample bottles.
- Completely fill the containers with stormwater as the water discharges from the Site.
- Write the sampler name, sample number, sample location, date, and time on sample containers.
- Place sample containers in a cooler with ice or ice packs to maintain the sample temperature between 4 and 6 °C.

AFTER SAMPLING

- Complete the chain-of-custody form.
- If samples are collected during working hours (8 - 5, Mon. through Fri.), deliver the samples directly to the laboratory(ies). If samples cannot be delivered to the laboratory immediately, place samples in a cooler with ice or ice packs to maintain the sample temperature between 4 and 6 °C. Deliver/call for pickup on the following day. Analysis of samples must begin within 24 hours of sample collection due to the maximum hold time of the aquatic toxicity samples.
- Complete stormwater monitoring report form provided in Attachment O. The information on this log will be used to complete the DMR submission.

ANALYTES

Arrange to have the environmental laboratory(ies) analyze the sample for the above listed parameters using EPA 40 CFR 136 methods.

Rand-Whitney will maintain records of monitoring results, field data sheet, and discharge monitoring reports.

Substantially Identical Discharge Points

Instructions: Document the following if you plan to use the substantially identical discharge point (SIDP) exceptions. For each SIDP, you must describe which discharge points they represent and an explanation of why the discharge points are expected to be substantially identical. The allowance for monitoring only one of the SIDP is NOT applicable to any discharge points subject to numeric effluent limitations guidelines.		
SIDP	Discharge Points Represented	Explanation of "Substantially Identical" Expectation

DSG 001	DSN 002, DSG 007	Drainage Area 002 does not have significant industrial activities; however, several features such as significant roof area and paved areas are substantially similar to Drainage Area 001. Additional information for both drainage areas include: - Drainage Area Sizes – The size of the Drainage Area 001 is approximately 70,000 ft^2 and Drainage Area 002 is approximately 67,200 ft^2. - The runoff coefficients for both areas are estimated to be 0.90. Drainage Area 007 includes primarily paved surfaces which are also a feature of Drainage Area 001. Additionally, both drainage areas include the management of rolloffs that contain or had contained OCC solids as well as the covered storage of sand/salt. Additional information for both drainage areas include: - Drainage Area Sizes – The size of the Drainage Area 001 is approximately 70,000 ft^2 and Drainage Area 007 is approximately 25,000 ft^2. - The runoff coefficients for both areas are estimated to be 0.90.
DSG 003	DSG 009, DSG 010	Drainage Area 009 primarily includes vehicle traffic including an entrance to the facility. This activity is similar to that performed in Drainage Area 003. Additional information for both drainage areas include: - Drainage Area Sizes – The size of the Drainage Area 003 is approximately 66,000 ft^2 and Drainage Area 009 is approximately 8,000 ft^2. - The runoff coefficients for both drainage areas are similar -D.A. 003 has a runoff coefficient of 0.85 and D.A. 009 has a runoff coefficient of 0.90. Drainage Area 010 primarily includes vehicle traffic including an entrance to the facility. This activity is similar to that performed in Drainage Area 003. Additional information for both drainage areas include: - Drainage Area Sizes – The size of the Drainage Area 003 is approximately 66,000 ft^2 and Drainage Area 010 is approximately 10,000 ft^2. - The runoff coefficients for both drainage areas are similar -D.A. 003 has a runoff coefficient of 0.85 and D.A. 010 has a runoff coefficient of 0.80.
DSG 006	DSG 004, DSG 005	Drainage Area 004 primarily includes vehicle traffic and loading of materials. This activity is similar to that performed in Drainage Area 006. Additional information for both drainage areas include: - Drainage Area Sizes – The size of the Drainage Area 006 is approximately 6,000 ft^2 and Drainage Area 004 is approximately 7,400 ft^2.

		- The runoff coefficients for both drainage areas are similar -D.A. 006 has a runoff coefficient of 0.90 and D.A. 004 has a runoff coefficient of 0.85. Drainage Area 005 primarily includes vehicle traffic and loading of materials. This activity is similar to that performed in Drainage Area 006. Additional information for both drainage areas include: - Drainage Area Sizes – The size of the Drainage Area 006 is approximately 6,000 ft^2 and Drainage Area 005 is approximately 29,00 ft^2. - The runoff coefficients for both drainage areas are 0.90.

Monitoring Program Documentation

Discharge Monitoring Reports (DMRs)

Instructions: This section of the SWPPP must contain the last five (5) years of the discharge monitoring reports (DMRs) for each discharge point monitored. If DMRs are stored electronically, the SWPPP must indicate this location in the SWPPP and make them available upon request.

Rand-Whitney will maintain copies of DMRs in their offices located in Montville, CT. Such copies will be made available to the DEEP upon request.

Monitoring Records

Instructions: For each measurement or sample taken pursuant to the requirements of this general permit, the discharger must maintain records of the following information:

- 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 results of the analyses

Deviations from the Monitoring Schedule

Instructions: This section of the SWPPP must describe any deviations from the schedule for visual assessments and/or outfall monitoring, and the reason for the deviations (e.g., adverse weather or it was infeasible to collect samples within the first thirty (30) minutes of a qualifying storm event).

Deviation	Reasoning

Corrective Actions for Monitoring Exceedances

Instructions: This section of the SWPPP must describe any corrective action documentation required per the IGP. If a permittee is invoking the exception for inactive and unstaffed facilities for indicator monitoring, benchmark monitoring or impaired waters monitoring, the permittee must include in their SWPPP a certification statement (Appendix F) as well as information to support this claim as required by Section 7(b)(14), 7(c)(2)(G)(iii), and Section 7(e).

Documentation of Benchmark Exceedances, Type of Response, & Corrective Action:

Attachment O will be used to document corrective actions for benchmark exceedances.

Documentation that Benchmark Monitoring can be Discontinued because the Exceedance was due to Run-On:

Not Applicable.

Documentation that no Further Pollutant Reductions were Technologically Available and Economically Practicable:

[Insert Documentation Here]

Documentation to Support the Conclusion that Pollutants of Concern are not Expected to be Present Above Natural Background Levels:

[Insert Documentation Here]

Section 5: Summary of Potential Pollutant Sources

Potential Pollutant Sources from Industrial Activities

List of Industrial Activities

Instructions: Identify a list of the industrial activities exposed to stormwater, including but not limited to those found in the IGP.
Vehicle and Equipment Fueling, Maintenance, Cleaning, and Storage:
Vehicle fueling for on-site equipment is performed Drainage Area 001 where runoff is directed to on-site collection/reuse. On-site vehicles are fueled from a 470-gallon diesel fuel tank which is equipped with secondary containment. Vehicle maintenance is performed indoors at the site. No exterior washing of vehicles, equipment of buildings is allowed.
Solid De-Icing Material Storage:
Rand-Whitney maintains a salt/sand pile on the Southeast part of the site in Drainage Area 003. The salt/sand pile is located on a paved surface and covered with hoop structure to minimize exposure to stormwater. Rand-Whitney also maintains a small sand/salt pile in Drainage Area 007 which is located on pavement and covered with a tarp.
Industrial Materials Storage Areas:
See the attached Table 2 which includes material storage activities.
Materials Handling Activities:
See the attached Table 1 which includes material handling activities.
Any Other Industrial Activity:
See Tables 1 and 2 for a summary of other industrial activities.

List of Potential Pollutants (or Pollutant Constituents from Industrial Activities)

Instructions: Identify a list of the potential pollutant(s) or pollutant constituents (e.g., crankcase oil, zinc, sulfuric acid, cleaning solvents) associated with each activity identified above that could be exposed to rainfall or snowmelt and could be discharged from the facility. The potential pollutant list must include all significant materials that have been handled, treated, stored, or disposed of, and that have been exposed to stormwater in the three years prior to the date the permittee prepares or amends their SWPPP.	
Activity/ Exposed Material	See attached Table 1.
On-site Location of Activity/ Material	
Associated Outfall #	
Associated Pollutants	
Method of storage/ Extent of exposure of activity	
Description of Storage (Tank type, size, AST, UST, etc.)	
Control measures used to minimize exposure	
Location and description of structural or non-structural measures to control pollutants/ treatment devices installed to treat stormwater runoff	

Additional Inventory Requirements by Sector	

*Repeat table if applicable

Method and Location of On-Site Storage or Disposal

Instructions: Document the method and location for storage or disposal of any raw materials, intermediate products, by-products, final products, and waste products used or created by the facility. This includes, but is not limited to, on-site storage or disposal of any waste material, or byproducts used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters; sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; etc. The permittee should list in this section any other waste permits issued by the Commissioner pursuant to Section 22a-430 or 22a-430b of the Connecticut General Statutes.

Material/ Product Type	See attached Table 2.
On-site Location of Material/Product Type	
Associated Outfall #	
Associated Pollutants	
Method of storage	
Method of disposal, if applicable	

*Repeat table if applicable

Spills and Leaks

Instructions: Identify a list of spills and leaks of five (5) gallons or more of petroleum products, or of toxic or hazardous substances which could affect stormwater, as listed in section 22a-430-4 (Appendix B Tables II, III and V, and Appendix D) of the Regulations of Connecticut State Agencies, and 40 CFR 116.4, that occurred at the facility after the date of three years prior to the date of certification of the SWPPP. The permittee must also document where potential spills and leaks could occur that could contribute pollutants to stormwater discharges, and the corresponding outfall(s) that would be affected by such spills and leaks.

Note: This permit does not relieve the permittee of the reporting requirements of 40 CFR 110, 40 CFR 117, and 40 CFR 302 relating to spills or other releases of oils or hazardous substances.

See Attachment I

Table #: Spills and Leaks	(Select One)	
	☐ Spill	☒ Leak
Date MM/DD/YY	Click or tap to enter a date.	
Location (see map)	Click or tap here to enter text.	
Type of Material	Click or tap here to enter text.	
Quantity	Click or tap here to enter text.	
Source	Click or tap here to enter text.	
Reason	Click or tap here to enter text.	
Response Procedures	Click or tap here to enter text.	
Additional Inventory Requirements by Sector (if applicable)	Click or tap here to enter text.	

*Repeat table if applicable

Areas of Site Where Potential Spills/Leaks Could Occur:

Location:	Loading and Unloading Areas and Vehicle Fueling
Description of activities or materials:	Transfer of fuel oil, ammonia, and diesel; Vehicle Fueling
Discharge Points:	DSGs 001 and 006

Location:	Heat Recovery System
Description of activities or materials:	Glycol Recirculation System
Discharge Points:	DSGs 004 and 006

Location:	Vehicle travel areas from equipment/vehicles
Description of activities or materials:	Diesel Fuel, hydraulic oil
Discharge Points:	DSGs 001, 003, 004, 005, 006, 007, 008, 009, 010

Location:	Bulk Tank Storage Areas
Description of activities or materials:	Diesel Fuel, No. 2 Fuel, Ammonia Storage Systems
Discharge Points:	DSGs 001, 006

Location:	Wastewater Transfers
Description of activities or materials:	Transfers of treated/untreated wastewater near/in Drainage Area 001.
Discharge Points:	DSG 001

Unauthorized Non-stormwater Discharges Evaluation

Instructions: Document that you have evaluated for the presence of unauthorized non-stormwater discharges (see the list of authorized non-stormwater discharges under this permit). Also include a non-stormwater discharge certification, signed by a Qualified Professional, as described in the IGP.
Date of Evaluation: 1/15/2026
Description of Evaluation Criteria Used: Visual inspection of drainage areas, receiving catch basins, and outfalls.
List of Discharge Points or Onsite Drainage Points Directly Observed During the Evaluation: Drainage areas/catch basins in Drainage Areas 001 through 007 and 009. A small amount of flow was observed in some of these outfalls but this flow can be attributed to snowmelt as there was snow on the ground during the evaluation, temperatures were above freezing, and the flow steams observed were clear. Outfall 008 discharges from a deep catch basin and the outfall was not located during the evaluation. However, during the evaluation, no flow was observed in the catch basins leading to this discharge. Outfall 010 discharges to the bank of Oxobox Brook. Due to the steep bank and heavy vegetative growth, the outfall was not located. However, there was no flow observed in the catch basin upstream of this outfall.
List of Actions Taken to Address any Unauthorized Non-Stormwater Discharges: No unauthorized discharges were observed during the evaluation.
Non-stormwater discharge evaluations have been conducted previously. See below for a summary of prior evaluations. Additionally, non-stormwater discharges have not been observed during Semi-Annual Comprehensive Site Evaluations conducted in 2024 and 2025.

De-icing Material Storage

Instructions: Document the location of any storage piles containing de-icing materials (including pure salt, salt alternatives or either of these mixed with other materials) used for de-icing or other commercial or industrial purposes.

Material Type:	Salt-Sand Mix
Location:	Southeast corner of Drainage Area 003 and Northwest corner of Drainage Area 007
Storage Length:	Salt/Sand has been stored at the site since prior to 2025
Structure:	In Drainage Area 003, it is a storage Bin covered under a hooped roof structure located on a paved surface. In Drainage Area 007, it is on a paved surface under a tarp.

Section 6: Stormwater Control Measures and Relevant Procedures

List of Stormwater Control Measures and Details

Non-structural control measures

Instructions: Non-structural control measures described in the SWPPP may include the following (list not exclusive): materials management practices employed to minimize contact of materials with stormwater runoff; employee training, and all the elements of good housekeeping.

Type of Control Measure	Persons or Positions responsible for maintenance/implementation	Schedules for maintaining/implementing the control measure	Specific items necessary to implement/maintain the control measure
Housekeeping	SW Team Leader	Monthly	Review site grounds periodically and during monthly inspections. Coordinate with maintenance team to address issues.
Inspections	SW Team Leader	Monthly	Perform and document monthly inspections
Employee Training	SW Team Leader	Annually	Perform annual training in accordance with this Plan.
Preventative Maintenance	Utilities Manager	In accordance with manufacturers' recommendations	Conduct routine maintenance of equipment such as cooling towers, compactors, etc.
Site-Wide Pavement Sweeping	Utilities Manager	As needed, but no less than semi-annual.	Manage contractor/employee performing sweeping.
Manual Sweeping	Utilities Manager	Manual Sweeping is performed daily at the docks and back road Drainage Area 001.	Manage employee performing sweeping.
Minimize Exposure	Utilities Manager	On-going	Protect materials stored outside with storm-resistant covering in event of extreme/heavy precipitation

Structural control measures

Instructions: Structural control measures described in the SWPPP may include the following (list not exclusive): grading, berms, curbing, baghouses, secondary containment, catch basins, as well as a description of any treatment the stormwater receives.

Type of Control Measure	Persons or Positions responsible for maintenance/implementation	Schedules for maintaining/implementing the control measure	Specific items necessary to implement/maintain the control measure
Catch Basin Cleaning	Utilities Manager	Annually, April or May	Retain/schedule a contractor to vac out the catch basin sumps.
Sediment/OWS Tanks	Utilities Manager	Inspect monthly, clean out as necessary or at a minimum annually.	Inspect basins for excess sediment/obstructions. Scheduling cleaning as necessary.
Secondary Containment Systems and Structures	Utilities Manager	Ongoing	1. Provide Secondary containment for petroleum products/starch silo 2. Ensure valves on containment systems are maintained in closed positions. 3. Follow established protocols for checking/draining stormwater from containment areas 4. Keep liquid transfer nozzles/hoses, where applicable, in secondary containment area

Evaluation for Non-stormwater Discharges

Instructions: The permittee must describe the evaluation that the stormwater discharge(s) from the site consist 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 this general permit, or of stormwater combined with any of the authorized non-stormwater discharges described in the IGP, provided they do not contribute to a violation of water quality standards.

See above section for details regarding the most recent non-stormwater evaluation performed by Chris Ecsedy, PE, CJE Environmental LLC.

Prior Non-Stormwater Discharge Evaluations were performed at Rand-Whitney by Williams Environmental Services, LLC. An excerpt from the prior SWPPP is provided below documenting the non-stormwater discharge evaluation is provided below:

Discharges from the facility have been determined to be either permitted under Section 22a-430 of the Connecticut General Statues or are stormwater discussed in this SPP Plan with the following exceptions. There are no discharges outside of "contained areas" from the facility except for: (a) water from periodic testing of RWCB's fire protection /sprinkler system required by state code for safety and insurance purposes (this is once-through pond water discharged to driveway surfaces) and (b) minor amounts of atmospheric water that occasionally condenses along roofs by the boiler water treatment room and at the south end of the Paper Machine building depending on weather conditions. Fire protection test water is currently not covered by a DEP permit. The DEP is aware of this discharge and it will be covered when a general permit is issued by the DEP. The condensed water discharges are an allowable non-stormwater discharge.

The SPP Plan has been developed by reviewing existing facility plans that show storm and sanitary drains and by interviewing facility personnel. No interior floor drains have been located that lead to stormwater outfalls at this facility. The facility was also inspected by Williams Environmental Services, LLC personnel, who are familiar with the stormwater regulations. Information for the development of this SWPPP has been provided by plant personnel.

The certification regarding non-stormwater discharges may be found on Page ii of this document.

Sector Specific Requirements

Instructions: The permittee must incorporate any sector-specific control measures pursuant to the IGP.

Not Applicable.

Stormwater Control Measures Schedules and Procedures

Good Housekeeping

Instructions: A schedule or convention used for determining when pickup and disposal of waste materials occur. Also, provide a schedule for routine inspections for leaks and conditions of drums, tanks, and containers.

Description of Activity	Schedule for Implementation
Municipal Waste Pickup	Twice per week
Scrap Metal Pickup	Monthly
Used Oil and Other Wastes	Semi-Annually (or as needed)
Manual Sweeping	Daily (Docks, back road)
Manufacturing Wastes	Daily
Informal Inspections Tanks, Containers, Secondary Containment Systems, and Drums	Daily

Spill Prevention and Response Procedures

Instructions: Procedures for preventing and responding to spills and leaks, including notification procedures. For preventing spills, include in the SWPPP the stormwater control measures for material handling and storage, and the procedures for preventing spills that can contaminate stormwater. Also specify cleanup equipment, procedures, and spill logs, as appropriate, in the event of spills. The permittee may reference the existence of other plans for Spill Prevention, Control, and Countermeasure (SPCC) developed for the facility under section 311 of the CWA or BMP programs otherwise required by a NPDES permit for the facility, provided a copy of that other plan is maintained onsite and made available for review consistent with the IGP.

Location on site	Control Measures for handling and storage	Procedures for preventing spills	Procedures for responding to spills	Cleanup Equipment	Spill log recorded/included in SWPPP?	
Material Loading/ Unloading Areas (Drainage Areas 001, 003, 004, 005, 006, 007, 008, 010)	Transfers Protected Loading Docks and Bays	Materials transferred in closed containers/ packages. Bulk deliveries are monitored.	See SPCC Plan	Spill Kits, Absorbents, PPE	☒ Yes	☐ No
Starch Silo (Drainage Area 003)	Delivery Procedures, Maintenance and Inspections	Inspections/ cleaning following starch deliveries.	See SPCC Plan	Spill Kits, PPE	☒ Yes	☐ No
No. 2 Fuel Oil and Ammonia Tanks (Drainage Area 008)	Delivery procedures, Inspections	Secondary Containment, Monthly Inspections	See SPCC Plan	Spill Kits, Absorbents, PPE	☒ Yes	☐ No
Diesel Fuel Tank/Fueling Area (Drainage Area 001)	Delivery procedures, Inspections	Secondary Containment, Monthly Inspections	See SPCC Plan	Spill Kits, Absorbents, PPE	☒ Yes	☐ No
Vehicle Traffic Areas (all drainage areas except 002)	N/A	Equipment Maintenance	See SPCC Plan	Spill Kits, Absorbents, PPE	☒ Yes	☐ No

Rand-Whitney maintains an SPCC Plan prepared in accordance with 40 CFR 112. See Section 5 above for logging spills and leaks in the SWPPP.

Sediment and Erosion Controls

Instructions: This permit does not authorize the discharge of waters containing polymers and/or other chemical treatments to the ground, storm sewer system, or any surface waters of the state. The SWPPP must describe any alternatives to polymers and/or other chemical treatments for erosion and sediment control in the SWPPP. Alternatives to chemical treatment can be determined through the selection, design, installation, and implementation of structural control measures in the Connecticut Stormwater Quality Manual.

Location on Site	Alternative Sediment and Erosion Controls in Use
The site does not use polymers or other chemical treatments to the ground, etc., to control erosion/sedimentation.	Not Applicable.

Maintenance

Instructions: Preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all stormwater control measures to avoid situations that may result in leaks, spills, and other releases, and any back-up practices in place should a storm event resulting in a stormwater discharge occur while a control measure is off-line. The SWPPP must include the schedule or frequency for maintaining all control measures used to comply with the effluent limits in the IGP.

Type of Maintenance	Schedule or Frequency
Sweeping of Paved Parking/Transportation Areas	Mechanically swept as needed. Starch silo area after starch deliveries
Catch basins	Cleaned annually.
Starch Silo	Inspected monthly and sweeping is performed following deliveries.
Sediment Tanks	Annually or more frequent as needed.
Secondary Containment Systems	Inspected monthly in accordance with SPCC Plan and Stormwater Inspection

Employee Training

Instructions: The elements of the employee training plan must include (at a minimum) all the requirements set forth in the IGP, and the following:

Rand-Whitney will conduct regular Stormwater Pollution Prevention Plan training for employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of the General Permit (e.g., inspectors, maintenance personnel), or whose activities may affect stormwater quality, including all members of the pollution prevention team. Rand-Whitney will ensure that all such personnel are familiar with the components and goals of these control measures and the SWPPP. The stormwater training will inform the personnel of the components and goals of the Plan.

The following personnel will be trained to understand the requirements of the General Permit and their specific responsibilities with respect to those requirements:

a. Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures).
b. Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges.
c. Personnel who are responsible for conducting and documenting inspections and monitoring as required in Sections 4.4 and 4.5 of the General Permit, respectively.
d. Personnel who are responsible for taking and documenting corrective actions.
e. If related to the scope of their job duties, personnel must be trained in at least the following (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections):
    - An overview of what is in the SWPPP.
    - Spill response procedures, emergency equipment location, good housekeeping, maintenance requirements, and material management practices. T
    - The location of all controls on the site required by the General Permit, and how they are to be maintained.
    - The proper procedures to follow with respect to the control measures on site.
    - When and how to conduct inspections, record applicable findings, and take corrective actions.
    - The facility's emergency procedures.

Training will be conducted or supervised by a member of the SWPP Team or other qualified person.

The training program in this Plan is contained in *Attachment G*. Employee training in accordance with this program will be conducted at a minimum of once per year. All new employees whose activities affect stormwater quality shall receive training within ninety (90) days of the date of their hire. An employee training activity record will be maintained in *Attachment G* of this Plan or in Rand-Whitney's environmental files.

Content of Training	Frequency/Schedule of Training	Log of dates and attendance recorded/included in SWPPP?	
Seet Attachment G	Annually	☒ Yes	☐ No
		☐ Yes	☐ No
		☐ Yes	☐ No

Documentation included in Attachment G

Stormwater Control Measures Documentation

Instructions: The SWPPP must contain the following types of documentation related to stormwater control measures:

Corrective Actions for SCMs that Could Not Meet Water Quality Standards:

See Attachment O, which will be reviewed and updated, as necessary, following completion of quarterly visual assessments and semi-annual benchmark monitoring.

Control Measures that were Never Designed, Installed, Implemented, or Maintained:

See Attachment O.

Maintenance and Repair of SCMs:

(including dates of regular maintenance, dates of discovery of areas in need of repair/replacement, dates that the control measures returned to full function after repairs, and justification for extended maintenance/repair schedules)

See Attachment O.

Any Changes or Updates to SCMs:

See Attachment O.

Any Additional Documentation Related to SCMs:

See Attachment O.

Section 7: Site Inspections, Visual Assessments, and Relevant Procedures

List of Inspected Areas

Instructions: List all areas of inspection in the SWPPP, including, but not limited to, the following:

Areas Where Industrial Materials or Activities are Exposed to Stormwater: Loading/unloading areas, outside storage, material transfer areas (see Attachment E for a complete list of areas inspected).
Areas Identified in the SWPPP that are Potential Pollutant Sources: See Table 1 above. These areas are identified in Attachment E.
Areas Where Spills and Leaks have Occurred in the Past Three Years: Included in Attachment E.
Discharge Points: DSGs 001 through 010.
Control Measures: Housekeeping, outdoor storage, retention basins. Catch basins will be inspected during the Comprehensive Facility Inspection included as Attachment D.
Sector-Specific Inspections: Not Applicable

Inspection Details

Instructions: For each type of inspection, the SWPPP must describe, at a minimum, the following details:

Type of Inspection	Person/Position Responsible for Implementation	Schedule of Inspections	Specific Items Covered
Monthly SW Inspection	SW Team Leader	Monthly	See Attachment E
Quarterly Visual Assessment	SW Team Leader	Quarterly	See Attachment F
Comprehensive Site Evaluation	SW Team Leader	Semi-Annual	See Attachment D

Inspection Schedules and Procedures

Instructions: The permittee must document in their SWPPP procedures for performing the types of inspections specified by this permit, which must include:

Monthly Routine Facility Inspections: Monthly inspections will be performed following the procedure/form provided in Attachment E.
Quarterly Visual Assessment of Stormwater Discharges: Quarterly Visual Assessments will be performed following the procedure/form provided in Attachment F.
Semiannual Comprehensive Facility Inspections: Semi-Annual Comprehensive Inspections will be performed following the procedure/form provided in Attachment D.

Inspection Documentation

Instructions: This section of the SWPPP must contain all inspection reports, including the monthly routine facility inspection reports, quarterly visual assessments, and semi-annual comprehensive site inspections as required in the IGP.

Blank inspection forms are provided in Attachment D, E, and F. Completed inspection forms will be maintained in this section of the plan or in Rand Whitney's Environmental Files and/or EHS file directory.

Section 8: Resilience Measures

Instructions: Implementing structural improvements, enhanced/resilient pollution prevention measures, and other mitigation measures can help to minimize impacts from stormwater discharges from major storm events such as hurricanes, storm surge, extreme/heavy precipitation, and flood events. If such SCMs are already in place due to existing requirements mandated by other state, local or federal agencies, the permittee should document in their SWPPP a brief description of the controls and a reference to the existing requirement(s). A list of SCMs that may be considered can be found in the IGP.

This subsection requires that the permittee must consider the requirements outlined in the IGP when selecting and designing control measures to minimize pollutant discharges via stormwater. This subsection does not require nor prescribe specific SCMs to be implemented; however, the permittee must document in their SWPPP the considerations made to select and design control measures at their facility to minimize pollutants discharged via stormwater.

Location on Site	Control Measure	Existing Requirements	Considerations
Deliveries - Fuel deliveries to Diesel Tanks and Ammonia Deliveries	Material delivery timing	Minimize deliveries during major storm events	When a delivery of exposed materials is expected, and a storm is anticipated within 72 hours (3 days), delay delivery until after the storm.
Emergency procedures for Storm Events	Spill prevention, emergency response	Maintain emergency response procedures in accordance with the Contingency and SPCC Plans.	Develop/supplement existing plans to include emergency procedures for major storms.
Staff Training	Training for spill prevention and response (SPCC, Stormwater, Contingency Plans)	Annual Training in accordance with SWPPP	Incorporate scenario-based emergency procedures for major storm events into annual training.
Future construction	Designed in accordance with DEEP requirements.	2024 Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Connecticut Stormwater Quality Manual	See below regarding future construction

Based on available FEMA mapping for Montville, CT, a portion of Drainage Area 008 and the front of the building off Route 163 is within a flood hazard area/Base Flood Elevation associated with Oxoboxo Brook. Other than vehicle/truck traffic, industrial activities are not performed in these areas.

Section 9: Future Construction

Instructions: Any construction activity that disturbs greater than one acre must be conducted in accordance with the Construction Stormwater General Permit. All construction activities, regardless of size, shall comply with the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Connecticut Stormwater Quality Manual for the design and implementation of postconstruction stormwater management measures. In addition, the permittee shall avoid, wherever possible, the use of copper or galvanized roofing or building materials for any new building construction where these materials will be exposed to stormwater. Permittees must notify the Commissioner of changes to the number or location of discharge points, which may require monitoring to be restarted and/or the SWPPP to be revised per the IGP. If significant changes are made to the site or to the SWPPP in accordance with the IGP, the SWPPP must be re-certified. Provide the site's plans for future construction below:

Rand-Whitney has plans to construct a new trailer parking area in the northwest corner of the facility. Rand-Whitney will assess whether the construction activity will disturb more than one acre, and if so, Rand-Whitney will ensure the construction is conducted in accordance with the Construction Stormwater General Permit. Additionally, this construction project and other construction activities, when undertaken, will comply with the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Connecticut Stormwater Quality Manual for the design and implementation of postconstruction stormwater management measures.

Section 10: 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.

Section 11: Annual Report

Instructions: Rand-Whitney is required to submit an annual report to the DEEP by April 15th after each calendar year using a form/template prescribed by the DEEP. The first annual report is due April 15, 2027. Annual reports are to include the following minimum information:

- a summary of monitoring data;
- a summary of site inspections;
- a summary of visual inspections;
- a summary of corrective actions;
- any incidents of non-compliance; and
- a certification statement.

The final report is to be submitted electronically to DEEP.Stormwater.Industrial@ct.gov.

Attachment A - General Location Maps

Instructions: Provide sufficient maps, i.e., a general location map and U.S. Geological Survey (USGS) quadrangle map) with enough detail to identify the location of the facility and all receiving waters to which stormwater discharges.

This Attachment IS REQUIRED for registration.

Attached

Attachment B - Site Maps

Instructions: The SWPPP must describe the industrial activities, materials employed, and physical features of the facility that may contribute significant amounts of pollutants in stormwater discharges. To improve the readability of the map, some detailed information may be kept as an attachment to the site map, and pictures may be included, as deemed appropriate. A detailed site description and site map will assist operators in identifying issues and setting priorities for the selection, design, and implementation of measures taken to meet effluent limits, and in identifying potential changes in materials, materials management practices, or site features. The site map is also vital for executing proper inspections. All required elements of the site map are listed in the IGP.

This Attachment IS REQUIRED for registration.

Attached

Attachment C – Sector-Specific Documentation

Instructions: The SWPPP must contain any Sector-Specific Documentation. At a minimum, this should include the Sector Specific Monitoring Form.

The Rand-Whitney facility is a Paperboard Mill and, therefore, is subject to Sector A of the Industrial General Permit. There are no additional monitoring requirements for Paperboard Mills under Sector A. Additional Sector A control measures applicable to Paperboard Mills under Section 8.1.5.c of the Industrial General Permit include the following:

- Loading and unloading areas – Loading and unloading for non-bulk deliveries, i.e., drums and totes and other smaller containers, is performed under roofed loading docks or weather-protected loading bays. Bulk deliveries are conducted in areas with containment systems designed to capture potential releases during deliveries.
- Material handling areas – Material handing areas are primarily located in doors. Handling of fiber wastes/OCC wastes are performed in Drainage Area 001 where stormwater runoff is directed to plant for use as make-up water.
- Chemical storage areas – Chemical storage areas are located indoors and are equipped with secondary containment systems. Bulk storage tanks for diesel, No. 2 Fuel, and ammonia are equipped with secondary containment systems which are routinely monitored.
- Equipment and vehicle maintenance, storage and repair areas – Equipment and vehicle maintenance is performed indoors as detailed in Section 5 of this SWPPP.

Attachment D – Semi-Annual Comprehensive Inspection Template

Instructions: The SWPPP must contain the permittee-created Semi-Annual Comprehensive Inspection Template. This template should be used each time you perform a Semi-Annual Comprehensive Inspection. Ensure that the template complies with of the IGP.

Attached

Attachment E – Routine Inspection Template

Instructions: The SWPPP must contain the permittee-created Routine Inspection Template. This template should be used each time you perform a Routine Inspection. Ensure that the template complies with the IGP.

Attached

Attachment F – Visual Assessment Template

Instructions: The SWPPP must contain the permittee-created Visual Assessment Template. This template should be used each time you perform a Visual Assessment. Ensure that the template complies with the IGP.

This Attachment IS REQUIRED for registration.

Attached is a copy of the Quarterly Visual Assessment Form and schedule sampling substantially identical outfalls.

Attachment G – Employee Training Materials

Instructions: The SWPPP must contain the permittee-created Employee Training Materials. Ensure that the materials fully cover all required components and comply with the IGP.

Employee Training Program
Guidance Document
Stormwater Pollution Prevention Plan

Rand-Whitney Containerboard, L.P.
170 Route 163
Montville, Connecticut

This program has been developed to provide training for those employees whose activities may result in exposure to stormwater runoff. The training program focuses on a review of this guidance document, the Stormwater Pollution Prevention Plan (SWPPP) and spill procedures regarding stormwater pollution prevention at the facility.

Training may be conducted either in person or completing an on-line training program. The training will include a review of the areas of spill control, good housekeeping methods, and materials management. The SWPPP Supervisor will review this document with designated employees at minimum of once per year. Upon completion of training, employees will sign a sheet signifying that they understand the objectives of the SWPPP program. Each signature sheet will be included with this Section or maintained in Rand-Whitney's environmental files. The document will be updated as necessary to reflect changes at the facility.

The objective of the SWPPP is to reduce the quantity of pollutants discharged from the facility. As such, it is the responsibility of all employees to perform their jobs in such a manner as to limit the impact of pollution to stormwater. The following practices shall be followed at the facility.

1.0 Spill Prevention & Response

Rand-Whitney has developed a SPCC Plan to address spill prevention and response procedures. Personnel will be trained in accordance with the spill prevention and response procedures outlined in the SPCC Plan.

2.0 Good Housekeeping

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

- Maintain clean and dry floors within buildings to prevent material from being tracked outdoors;
- Maintain proper pathways and walkways and proper storage of containers and drums;
- Maintain company vehicles to minimize leaks;
- No washing of equipment, buildings, or vehicles at the Site which allows wash waters to enter the stormwater drainage system or surface waters will be conducted; and
- Cover solid waste containers and keep container drain plugs intact.

3.0 Materials Management/Control Measures

Material management practices and control measures shall be implemented to reduce or eliminate contact of

materials with stormwater. At a minimum, the following material management practices will be implemented.

- Liquid materials shall be stored such that exposure to stormwater is kept to a minimum;
- All valves from fuel and chemical storage areas shall be tightly closed when not in use; and

4.0 Records

Records retention will be as described in the Plan. Stormwater sampling and training records will be retained for 5 years after the expiration of the General Permit.

Attachment H – Employee Training Sign-Off Sheet

Instructions: The SWPPP must contain the Employee Training Sign Off Sheets from the permit term.

Attached

Attachment I – Record of Spills and Leaks

Instructions: Identify a list of spills and leaks of five (5) gallons or more of petroleum products, or of toxic or hazardous substances which could affect stormwater, as listed in section 22a-430-4 (Appendix B Tables II, III and V, and Appendix D) of the Regulations of Connecticut State Agencies, and 40 CFR 116.4, that occurred at the facility after the date of three years prior to the date of certification of the SWPPP. The permittee must also document where potential spills and leaks could occur that could contribute pollutants to stormwater discharges, and the corresponding outfall(s) that would be affected by such spills and leaks.

Attached

Attachment J – Copy of Registration

Instructions: The SWPPP must contain a copy of the permittee's submitted registration form, as well as any correspondence exchanged between the permittee and DEEP specific to coverage under this permit.

Copy to be attached once complete.

Attachment K – Copy of Notice of Coverage Letter From DEEP

Instructions: The SWPPP must contain a copy of the permittee's Authorization Letter assigning a permit number provided by DEEP after an NOI has been approved.

To be attached once received.

Attachment L – Coastal Consistency Review

Instructions: The SWPPP must contain documentation regarding the Coastal Consistency Review if it is applicable to the site.

This Attachment shall only be included if it is applicable to the site.

Not Applicable.

Attachment M – Natural Diversity Database

Instructions: The SWPPP must contain documentation regarding the Natural Diversity Database if it applies to the site.

This Attachment shall only be included if it is applicable to the site.

The NDDB assessment does not apply based on a review of DEEP's NDDB map for Montville, CT dated December 2025.

Attachment N – Conservation or Preservation Restriction

Instructions: The SWPPP must contain documentation regarding Conservation or Preservation Restriction Information if it applies to the site.

This Attachment shall only be included if it applies to the site.

Not Applicable.

Attachment O – Corrective Action

Instructions: The SWPPP must contain documentation regarding corrective action as required by the IGP.

This Attachment shall only be included if it applies to the site.

The attached form will be used to document Corrective Actions.

Attachment P – Stormwater Monitoring Documentation Form

Instructions: Complete this form to document information regarding the stormwater monitoring event.

Attached

Attachment Q – The General Permit

Instructions: The SWPPP must contain a copy of the IGP

Attached