

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Crabtree & Evelyn, Ltd.

PERMIT, ADDRESS, AND FACILITY DATA

Permit No. 201304003

Application No. SP0002299

<u>Mailing Address:</u>	<u>Location Address:</u>
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City: Woodstock ST: CT Zip: 06281	City: Woodstock ST: CT
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Permit Information

Duration 5 Year 10 Year 30 Year
Type New Reissuance Modification
Categorization Point (X) Non-Point () GIS #
 NPDES () Pretreatment (X) Groundwater (UIC) () Groundwater (Other) ()
 NPDES Major (MA)
 NPDES Significant Minor or Pretreatment SIU (SI) X
 NPDES or Pretreatment Minor (MI)
 Pretreatment Significant Industrial User (SIU) X
 Pretreatment Categorical (CIU) X

Standard Industrial Classification ("SIC") Code: 2844 – Perfumes, Cosmetics, and Other Toilet Preparations
 2841 – Soap and Other Detergents, except Specialty Cleaners

Compliance Issues

Compliance schedule? Yes.

On or before sixty (60) days after the permit issuance date, the Permittee shall submit a proposed schedule, plans and specifications and/or manufacturer's product information for the installation of a recirculation pump in tank no. 2. The Permittee shall also submit an updated copy of the Operation and Maintenance Manual. The Operation and Maintenance Manual shall describe the standard operating procedures implemented for the collection of flow proportional daily composite samples prior to discharge to the sewer.

Is the permittee subject to a pending enforcement action? Yes No

Ownership Code

Private Federal State Municipal Other

DEEP Staff Engineer Mariana Miller

Permit Fees

PERMIT No. SP0002299

Discharge Code	DSN Number	Annual Fee
501059Z and 501032X	200-1 and 201-1	\$9,085.00

For Sewer Discharges

The discharge is to the Putnam POTW via the Town of Woodstock sanitary sewer system. The facility I.D. number of the POTW is 116-001.

Nature of Business Generating Discharge

Crabtree & Evelyn (“C&E”) develops, manufactures and packages creams, lotions, liquid soaps, shampoos, conditioners, massage and bath oils, body and hand washes, bath gels, and body and hand scrubs.

Process and Treatment Description (by Discharge Serial Number (“DSN”))

DSN 200-1 – Wastewater is generated by cleaning multiple work areas within the toiletries blending and filling departments. There is also a discharge of non-contact cooling water from an emergency pressure relief system. Wastewaters are treated in two separator tanks. The pH of the wastewaters is adjusted prior to discharge.

DSN 201-1 – Wastewater is generated by cleaning glassware in the research and development lab. No treatment is necessary.

Resources Used to Draft Permit

- Federal Effluent Limitation Guidelines 40 CFR 417, Subpart H: Soap and Detergent Manufacturing Point Source Category, Manufacture of Liquid Soaps Subcategory; 40 CFR 403: General Pretreatment Regulations for Existing and New Sources of Pollution
- Department File Information

Basis for Limitations, Standards or Conditions

- Case-by-Case using Best Professional Judgment (“BPJ”) (See *Comments*)

Comments

The pH limits of 5.0-10.0 S.U., maintained from the previous permit, are considered to be protective of sanitary sewer systems.

Crabtree & Evelyn (“C&E”) was previously categorized under 40 CFR 417, Subpart P: Manufacture of Liquid Detergents Subcategory. However, C&E does not manufacture any detergents at the facility. C&E representatives have indicated that the liquid soaps manufactured by C&E are a blend of surfactants, not saponified oils or fatty acids. The oils and fatty acids used are blended with emulsifiers to create a variety of personal care products. As such, division staff and C&E representatives feel that 40 CFR 417, Subpart H is most applicable to the operations that take place at the facility.

This facility is subject to the Pretreatment Standards for Existing Sources because the dates when indirect chargers would be considered to be ‘new sources’ under 40 CFR 417 apply only to subparts O, P, Q and R.

In accordance with 40 CFR 417.84, any existing source subject to regulation under this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR 403. In addition, monitoring is required for biochemical oxygen demand (5 day), total suspended solids, oil and grease, pH, and

chemical oxygen demand. These requirements are reflected in monitoring table A of this permit. Monitoring requirements have also been retained for surfactants.

40 CFR 417.166(a) (the Pretreatment Standards for New Sources in subpart P) states “There shall be no discharge of wastewater streams in which both the COD/BOD7 ratio exceeds 10.0 and the COD exceeds 1.10 kg/kg of anhydrous product.” As such, the previously issued permit required C&E to monitor DSN 200-1 for BOD7. This monitoring requirement has not been included in this permit, given that the discharge is more appropriately regulated under subpart H.

On May 26, 2011, C&E submitted Application No. 201103854 to modify the average monthly flow limit for DSN 200-1 from 2,000 gpd to 10,600 gpd and the maximum daily flow limit for DSN 200-1 from 4,800 gpd to 15,000 gpd. A permit modification was issued to C&E on September 28, 2011. This permit contains the flow rates authorized under the modification.

On April 21, 2014, C&E submitted a request for approval to re-route the air compressor condensate discharge from the boiler room to the floor drain in the facility washroom. It was anticipated that there would not be a change in flow. This change was approved on June 2, 2014.

C&E also discharges stormwater, covered under the *General Permit for the Discharge of Stormwater Associated with Industrial Activity*.

Effluent exceedance history:

pH:

Outfall	Sample month	pH (S.U.)	Permitted Range (S.U.)
200-1	February 2012	4.8	5.0-10.0
201-1	October 2012	4.76	
	November 2012	4.59	

Flow:

Outfall	Sample month	Flow (gpd)	Permitted Flow (gpd)
201-1	November 2010	617	160
	December 2013	222	

The flow exceedances at DSN 201-1 were caused by flow to all sinks in the R&D laboratory during maintenance work, and not by any industrial or laboratory activity.

Although minor, C&E does not have any documentation indicating the causes and corrective actions taken against the pH exceedances in 2012. pH has been within permit limits since the last exceedance in November 2012.

DEEP records also indicate that C&E does not have any outstanding enforcement actions.

The Putnam POTW confirmed its approval with the permit conditions on December 9, 2014.