STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

Amgraph Packaging, Inc.

Baltic, Connecticut

March 2026

Prepared for

Amgraph Packaging, Inc.

90 Papermill Road

Baltic, Connecticut 06330

Loureiro Engineering Associates, Inc.

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An Employee-Owned Company

Affirmative Action / Equal Opportunity Employer

Comm. No. 002AP5.04

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ACRONYMS

BMPs	Best Management Practices
CAM	Corrective Action Measure
CFR	Code of Federal Regulations
COD	Chemical Oxygen Demand
CT DEEP	Connecticut Department of Energy and Environmental Protection
Cu	Total Copper
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
FOIA	Freedom of Information Act
GP	National Pollutant Discharge Elimination System General Permit for the Discharge of Stormwater Associated with Industrial Activities
NAICS	North American Industry Classification System
NO_3-N	Nitrate as Nitrogen
NRC	National Response Center
O&G	Oil and Grease
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCBS	Polychlorinated Biphenyls
PE	Professional Engineer
PM	Preventive Maintenance
PPT	Pollution Prevention Team
SIC	Standard Industrial Classification
SIDP	Substantially Identical Discharge Point
SWPPP	Stormwater Pollution Prevention Plan
TKN	Total Kjeldahl Nitrogen
TMDL	Total Maximum Daily Load
TP	Total Phosphorous
TSS	Total Suspended Solids
USGS	United States Geological Survey
VOC	Volatile Organic Compound
WET	Whole Effluent Toxicity
Zn	Total Zinc

Site Contact Information

Facility Operator(s): Kenneth Fontaine
Name: Amgraph Packaging, Inc.
Address: 90 Papermill Road
City, State, Zip Code: Baltic, CT, 06330
Telephone Number: 860-822-2000
Email address: ken.fontaine@amgraph.com

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

Site Contact if different than operator:
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Address: 90 Papermill Road
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SWPPP Contact(s):
SWPPP Contact Name (Primary): Pamela Thibeault
Telephone Number: 860-861-2248
Email address: pamela.thibeault.com
SWPPP Contact Name (Backup): Chris Abbott
Telephone Number: 860-822-2035
Email address: chris.abbott@amgraph.com

1. INTRODUCTION

Loureiro Engineering Associates, Inc. (Loureiro) was retained by Amgraph Packaging, Inc. (hereafter referred to as Amgraph) to prepare a Stormwater Pollution Prevention Plan (SWPPP) (hereafter referred to as the "Plan") for its Site located at 90 Papermill Road in Baltic, Connecticut (hereafter referred to as the "Site"). This Plan has been prepared to provide Amgraph with the appropriate information and guidance to ensure that stormwater discharges associated with industrial activities conducted at the Site are properly managed in compliance with the Connecticut Department of Energy and Environmental Protection (CT DEEP) *National Pollutant Discharge Elimination System General Permit for the Discharge of Stormwater Associated with Industrial Activities* (hereafter referred to as the "GP"), that went into effect on November 1, 2025. This Plan has been prepared according to the requirements of the GP and guidance provided by CT DEEP. An electronic copy of the GP is available to Amgraph personnel at the location specified in Appendix A, GP, and a physical copy of the GP will be kept alongside this Plan. Documentation of GP registration for the Site is provided in Appendix B, General Permit Registration.

In general, this Plan identifies the potential sources of stormwater pollution and provides recommendations for implementing best management practices (BMPs) to reduce these pollutants. This Plan contains the necessary certifications and signatures required by the GP, identifies the members of the stormwater Pollution Prevention Team (PPT) and their associated responsibilities, describes the potential sources of pollutants which may reasonably be expected to affect stormwater quality, and presents the stormwater management measures and controls appropriate for the Site. A program for the routine sampling and analysis of the stormwater discharges is also provided to give the Site (i.e., the PPT and/or a contractor) the necessary guidance to comply with the requirements of the GP.

This Plan must be revised and updated periodically and as necessary to include any changes to the configuration and operation of the Site. The conditions requiring an amendment to this Plan are identified in Section 8 of this Plan.

1.1 Description of the Site

Amgraph operates under the Standard Industrial Classification (SIC) Code 2759 (Commercial Printing, Not Elsewhere Classified), and North American Industry Classification System (NAICS) Code 323112, Commercial Flexographic Printing. Amgraph's industrial activities include offset lithographic printing, rotogravure printing, adhesive lamination, extrusion lamination, and slitting of flexible packaging for consumer food products.

The Site is approximately 14.6 acres in size and is covered by a building structure, grassy areas, paved driveway areas, paved parking areas, and wooded areas. The Site has approximately 105,415 square feet of impervious surface.

Stormwater from the Site is conveyed to a retention basin located on the northwest corner of the facility. Effluent from the basin has the potential to discharge to a wooded wetland located on the west side of the Site. However, stormwater may also infiltrate into the ground within the basin, resulting in no discharge to the wooded wetland.

The wetland eventually discharges to Little River (CT3805-00-2), which is classified as Class B according to the most recent (October 2018) Water Quality Classification Map of Sprague created by CT DEEP. Little River is designated as an impaired water of Connecticut for mercury, whole effluent toxicity (WET), and polychlorinated biphenyls (PCBs). The Site is not in an area of State and Federal Listed Endangered, Threatened, and Special Concern Species, and is not located within an aquifer protection area.

The Site is located at 41°36'45.86"N 72°02'9.96"W. A United States Geological Survey (USGS) Map depicting the location of the Site is included as Figure 1, USGS Site Location Map. A Site Plan depicting Site features, activities, and materials that may be sources of stormwater pollution is included as Drawing 1, Site Plan.

2. SIGNATURES AND CERTIFICATIONS

The following section details and provides the certifications required by the GP.

2.1 Management Certification

As required by the GP, Section 5.21.1, this Plan must be signed by a responsible corporate officer of the Site as follows:

"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."

Permittee:
Amgraph Packaging, Inc.

Certifier Name: Michael Higgins

Certifier Title: Corporate Operating Office

Certifier's Signature:

Date: 3/30/26

Site/Facility Name: Amgraph Packaging, Inc.

Site/Facility Address: 90 Papermill Road, Baltic, CT 06330

General Permit No.: CTR050000

2.2 Certification that the SWPPP Meets Permit Criteria

As required by the GP, Section 4.3.1.1, this Plan must be certified by a Qualified Professional as defined in the GP as follows:

I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan prepared for the site or facility known as Amgraph Packaging, Inc.. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the Stormwater Pollution Prevention Plan meets the criteria set forth in the General Permit for the Discharge of Stormwater Associated with Industrial Activity effective on November 1, 2025.

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: Jared Shapiro, CHMM

Certifier Title: Senior Project Manager, EHS

Certifier's Signature: 

Date: 3/27/2026

Site/Facility Name: Amgraph Packaging, Inc.

Site/Facility Address: 90 Papermill Road, Baltic, CT 06330

General Permit No.: CTR050000

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2.3 Certification of Non-Stormwater Discharges

As required by the GP, Section 4.3.2.9, this Plan must include the following certification of non-stormwater discharges.

I certify that in my professional judgment, the stormwater discharge from the site or facility known as Amgraph Packaging, 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 Section 5(b)(10) the General Permit for the Discharge of Stormwater Associated with Industrial Activity effective on November 1, 2025, or of stormwater combined with any of the following discharges provided they do not contribute to a violation of water quality standards:

1. *discharges from emergency/unplanned fire-fighting activities,*
2. *landscape irrigation or lawn watering,*
3. *uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids.*
4. *uncontaminated ground water or spring water,*
5. *uncontaminated groundwater from foundation or footing drains.*
6. *water sprayed for dust control, in accordance with the conditions of the general permit, and*
7. *for Sector A only, discharges from the spray down of lumber and wood product storage yards where no chemical additives are used in the spray-down waters and no chemicals are applied to the wood during storage.*

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 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: Jared Shapiro, CHMM Certifier Title: Senior Project Manager, EHS

Certifier Signature:  Date: 3/27/2026

Site/Facility Name and Address: Amgraph Packaging, Inc. 90 Papermill Road, Baltic, CT 06330 General Permit No.: CTR05000

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3. STORMWATER POLLUTION PREVENTION TEAM (PPT)

The PPT is responsible for the implementation of all actions set forth in the GP and detailed in this Plan. The PPT must direct all necessary revisions and additions to this Plan as dictated by operational changes at the Site, as required by the provisions of the GP, as well as maintain control measures and take corrective actions where required. The following table lists the PPT Members who may be contacted in the event of an accidental release of pollutants to the stormwater system. At least one PPT Member must be present at the Site or on call during all operational shifts.

TABLE 3-1 PPT

Role	Name and Title	Phone Number	Responsibilities
PPT Leader	Pamela Thibeault, Maintenance & Reliability Planner/Environmental	860-861-2248	▪ Direct the development of the SWPPP. ▪ Maintain records and ensure reports are properly submitted. ▪ Participate in routine evaluation of the effectiveness of this SWPPP. ▪ Coordinate employee training program. ▪ Ensure performance of semi-annual comprehensive site compliance inspections. ▪ Coordinate collection of quarterly, semi-annual and annual stormwater discharge samples and perform reporting as detailed in this SWPPP. ▪ Ensure routine inspections are performed or perform inspections. ▪ Ensure preventative maintenance program is implemented. ▪ Oversee housekeeping practices. ▪ Coordinate spill response activities.

PPT Member	Chris Abbott, Senior Engineer	860-822-2035	▪ Assist in implementation of, maintenance, and revision of this SWPPP. ▪ Assist in initial site assessment. ▪ Assist in maintaining records and ensure reports are properly submitted. ▪ Assist in the identification of pollutant sources and risks. ▪ Assist in the selection of appropriate BMPs. ▪ Participate in routine evaluation of the effectiveness of this SWPPP. ▪ Direct implementation of BMPs. ▪ Coordinate spill response activities.

4. POTENTIAL POLLUTANT SOURCES

4.1 Summary of Drainage Areas

The Site has three (3) drainage areas. The stormwater discharges, drainage areas, flow, and potential pollutant sources at the Site are depicted in Drawing 1. In addition, the potential pollutants associated with the activities conducted at the Site and the stormwater drainage systems at the Site are detailed in this section.

TABLE 4-1 SUMMARY OF DRAINAGE AREAS

Location of Discharge Point	Sequential Number & Descriptor	Estimate of Runoff Coefficient of Drainage Area
Retention basin on northeast corner of Site.	001 East Roof Area & Paved Area	0.88
Retention basin on northeast corner of Site.	002 West Roof Area & Paved Area	0.94
Vegetated and crushed stone landscaped areas.	003 Grass Areas, Paved Driveways, Southern Section of Parking Lot	0.33

4.1.1 Drainage Area 001

Drainage Area 001 includes the roofs of the 1963 and 1974 building sections, as well as adjacent paved and crushed stone areas located to the north and east of these building sections. Operations meeting the definition of Industrial Activity are performed by Amgraph within this drainage area.

Potential pollutant sources located within Drainage Area 001 include:

- Leakage of oil and grease (O&G) from roof-top heating, ventilation, and air conditioning (HVAC) units.
- Exhaust emissions from boilers, printing presses, ovens, and treaters.
- Exhaust emissions and leakage of O&G from plastic extruders.
- Contaminants from material transfer activities and truck traffic associated with the covered loading dock located on the north side of the Site building.
- Leakage of hydraulic oil from the trash compactor and associated hydraulic reservoir located on the north side of the 1963 building section.

- Contaminants associated with the two dumpsters located under the covered loading dock.
- Leakage of ink and solvents from the three overflow tanks serving the ink room.
- Leakage of oil from the fire pump and associated 300-gallon diesel fuel tank located in storage shed on north side of the 1963 building section.
- Leakage of oil from the 100-gallon utility diesel tank located under the covered loading dock.
- Spillage of resin pallets from the two plastic resin silos located on north side of the 1963 building section.
- Contaminants from empty drums and totes, and wood and metal pallets located under the covered loading dock.
- Minor leakage of O&G from vehicular traffic on paved areas.

Control measures in Drainage Area 001 include preventative maintenance and routine inspections. The stormwater collection system consists of roof drains on the 1963 and 1974 sections of the building that discharge through interior drainage leaders and underground stormwater piping into the stormwater conveyance system that leads to Outfall 001. Stormwater runoff from the paved areas in Drainage Area 001 sheet flows into the catch basins located along the north side of the Site. Stormwater runoff also sheet flows to the crushed stone areas and infiltrates into the ground. There is seasonal sweeping of paved areas to reduce buildup of sediment and other contaminants.

The runoff coefficient is estimated using the equation provided in Chapter 4 of the Connecticut Stormwater Quality Manual effective March 30, 2024, as a function of impervious area.

The equation for the volumetric runoff coefficient is defined as $R = 0.05 + 0.009(I)$, where:

- R = volumetric runoff coefficient; and
- I = percent impervious area.

Therefore, the runoff coefficient is $R = 0.05 + 0.009 * \frac{3.29}{3.29+0.27} * 100\% = 0.88$

4.1.2 Drainage Area 002

Drainage Area 002 includes the pitched roofs of the 2008 and 2018 building sections, as well as adjacent paved and crushed stone landscaped areas located to the north of these building sections. Operations meeting the definition of Industrial Activity are performed by Amgraph within this drainage area.

Potential pollutant sources located within Drainage Area 001 include:

- Contaminants from the permanent storage pile of salt and sand mixture located in open-sided shed on the northwest corner of the Site.
- Contaminants from material transfer activities and truck traffic associated with the shipping and receiving loading docks located on the northwest side of the Site building.
- Leakage of hydraulic oil from the trash compactor and associated hydraulic reservoir located on the northwest side of the Site building.
- Contaminants from scrap metal and enclosed storage trailers located on the northwest corner of the Site.

Control measures in Drainage Area 002 include preventative maintenance and routine inspections. The stormwater collection system in this area consists of roofs drains on the 2008 and 2018 sections of the building. The roof drains discharge through interior drainage leads and underground piping into the stormwater conveyance system that leads to Outfall 002. Stormwater runoff from the paved areas in Drainage Area 002 sheet flows into the catch basin located on the northwest side of the Site building. Stormwater runoff also sheet flows to the crushed stone areas and infiltrates into the ground. There is seasonal sweeping of paved areas to reduce buildup of sediment and other contaminants.

The runoff coefficient is estimated using the equation provided in Chapter 4 of the Connecticut Stormwater Quality Manual.

Using this equation, the runoff coefficient is $R = 0.05 + 0.009 * \frac{2.39}{2.39+0.02} * 100\% = 0.94$

4.1.3 Drainage Area 003

Drainage Area 003 includes paved and grass areas on the east, west, and south sides of the Site building. No industrial activities are conducted by Amgraph within Drainage Area 003. Potential pollutant sources located within this area include:

- Minor leakage of O&G from vehicular traffic on paved areas.
- Leakage of oil from pad-mounted electrical transformers.

Stormwater runoff sheet flows across vegetated and crushed stone landscaped areas, where it infiltrates into the ground.

The runoff coefficient is estimated using the equation provided in Chapter 4 of the Connecticut Stormwater Quality Manual.

Using this equation, the runoff coefficient is $R = 0.05 + 0.009 * \frac{0.94}{0.94+2.13} * 100\% = 0.33$

4.2 Non-Stormwater Discharges

At the time of certification of this Plan, there are no non-allowable, non-stormwater discharges entering the stormwater drainage system. The Certification of Non-Stormwater Discharges is included in Section 2.3 of this Plan, and the supporting information for the certification is provided in Appendix C, Certification of Non-Stormwater Discharges Supporting Information.

Amgraph has no discharges on site that are authorized by permits other than the GP.

4.3 Summary of Potential Pollutant Sources & Controls

Table 4-2, Inventory of Exposed Materials, provides an inventory of the potential pollutant sources located within the discharge drainage areas of the Site. In addition, a detailed description of the potential pollutant sources related to stormwater runoff is presented in this section. Areas of concern due to their potential to contribute to stormwater pollution at the Site include outdoor storage areas, material handling areas, and exhaust ventilation. Amgraph will notify CT DEEP no fewer than 30 days prior to making any planned physical alterations or additions to the Site that qualify the Site as a new source or that could significantly change the nature or significantly increase the quantity of pollutants discharged.

4.3.1 Roof Areas

The roof in Drainage Area 001 has several HVAC units which contain lubricants and/or refrigerants that may leak onto the roof surface and impact stormwater quality. To minimize their potential impact, the HVAC units are inspected monthly and serviced annually by an outside contractor, HVAC USA. Uncontaminated condensate from these units, an allowable non-stormwater discharge, is released onto the roof surface.

Exhaust vents from printing presses, ovens, and treaters release volatile organic compounds (VOCs), ozone, and heat generated during the curing of inks and the treatment of films, foils, and paper. Since VOCs and ozone have a low potential for surface deposition, these exhaust vents are not considered a significant source of stormwater pollution.

Exhaust stacks from the boiler room may introduce particulate matter to stormwater runoff due to natural gas combustion. Other exhaust vents located in the Drainage Area 001 roof – such as the fluid heater room stacks and general building ventilation stacks - are not considered a significant source of stormwater pollution.

The north side of the Drainage Area 001 roof contains two exhaust vents associated with the facility's plastic extruders. The exhaust vent for extruder #1 is equipped with an oil filter and drip pan to collect oily residue from the hot plastic exhaust, while the exhaust vent for extruder #2 is equipped with a self-contained grease trap. These vents have the potential to release oil and grease onto the roof surface and impact stormwater quality. To prevent overflow or leakage, the extruder #1 drip pan and oil filter are serviced monthly, while the self-contained grease trap for extruder #2 is serviced annually.

The roofs in Drainage Area 002 are pitched and contain no equipment, stacks, or other potential pollutant sources.

4.3.2 Outdoor Material Storage and Equipment

Outdoor material storage and equipment at the Site include two enclosed trash compactors, three storage trailers, two dumpsters, three overflow tanks, two resin silos, one liquid nitrogen silo, several compressed gas cylinders, empty drums and totes, wood and metal pallets, snow removal equipment, one fire pump with a corresponding diesel tank, one utility diesel tank, six pad-mounted transformers, one natural gas generator, two natural gas fuel cells, and scrap metal.

Two enclosed trash compactors for general Site refuse, each equipped with external hydraulic reservoirs, are located on the north side of the Site building - one by the water tower and the other adjacent to the receiving loading dock. The compactors are inspected monthly for signs of leakage

and for any scrap paper accumulation on the pavement that could contribute to stormwater contamination.

Two dumpsters containing polyresin waste and general refuse are located under the covered dock on the north side of the Site building. This covered dock area also houses empty drums and totes, wood and metal pallets, and snow removal equipment. Since these materials and equipment are stored in a roofed area that prevents exposure to rainfall, the potential for stormwater pollution is low.

Three overflow tanks serving the ink room are located behind the water tower. These tanks remain empty unless a spill occurs in the ink room, in which case spilled material would be directed to them. Amgraph inspects the tanks monthly to verify their integrity and to check for any indication that a spill has occurred in the ink room.

One fire pump and its double-walled 300-gallon diesel fuel tank are located in a storage shed on the north side of the Site building. A 100-gallon utility diesel tank is located under the covered dock and is positioned on a secondary containment pallet. The fire pump and both diesel tanks are inspected monthly by Amgraph personnel for signs of leakage.

Six utility-owned transformers are situated along Bituminous Drive on the south side of the building. Due to their design and operational integrity, the potential for stormwater pollution is relatively insignificant. Any minor seepage of transformer oil is expected to be detected promptly during monthly inspections conducted by Amgraph. If a transformer oil release is observed, Amgraph should immediately notify the utility company to mitigate the release.

Three enclosed storage containers are located in the northwest corner of the Site. Since materials are stored within sealed containers, the potential for stormwater exposure and contamination is minimal.

Similarly, due to their design and operational integrity, the natural gas generator, the two fuel cells, the liquid nitrogen silo, the two resin silos, and the compressed gas cylinders present a relatively insignificant risk for stormwater pollution.

Scrap metal parts are located on the northwest corner of the Site near the salt storage shed. Corrosion from these metal materials may pose a potential source of stormwater contamination.

4.3.3 Material Handling

The Site has three loading dock areas: one covered dock and two shipping and receiving docks located on the north side of the building. Material handling activities also occur during loading of the fire pump diesel fuel tank, the two resin silos, and the liquid nitrogen cryogenic tank.

The covered loading dock is connected to the fluid heater room, where mineral oil change-out activities are conducted as necessary. During the change-out process, used mineral oil is pumped into waste drums located on the concrete dike inside the fluid heater room. New oil is added to the fluid heater one drum at a time, with each drum placed on a spill pallet while staged outside on the loading dock. After all new oil drums have been emptied, the empty drums and the waste oil drums are promptly shipped off-site for recycling and disposal.

The receiving dock is used for receiving bulk shipments of raw materials and chemicals including inks, coatings, and solvents in containers up to 330 gallons in size. This dock is also used for shipping non-hazardous waste in containers up to 330 gallons in size. The shipping dock is only used for shipping finished paper packaging.

If a spill was to occur during material transfer at the loading docks, Amgraph would attempt to contain the spilled material using available spill control equipment and appropriately trained Amgraph personnel. Amgraph would contact an outside contractor to clean up the spill.

The diesel fuel tank is located within a shed and is filled by a delivery truck via a dedicated fill connection. During fueling, the truck is positioned at the shed entrance, and diesel fuel is transferred from the truck to the tank via a hose using the truck's pump. A storm drain is located near the shed entrance; therefore, the drain must be covered and protected prior to and during fuel transfer activities to prevent any potential release from entering the stormwater system. The fueling operation is continuously monitored to prevent overfilling. Any incidental drips or spills are managed in accordance with site spill prevention procedures.

Plastic resin pellets are delivered by bulk truck and transferred to the silo through a vacuum-operated fill line that draws pellets from the truck into the silo. The filling operation is monitored to prevent overfilling and equipment malfunctions. Stormwater controls are implemented by maintaining sealed connections and promptly recovering any spilled pellets.

The liquid nitrogen cryogenic tank is refueled by a delivery truck that connects to the tank's designated fill line. Since liquid nitrogen is an inert substance that rapidly evaporates when released, it does not pose a stormwater pollution risk.

4.3.4 De-icing Material Storage

Amgraph has a permanent storage pile of salt and sand mixture located in an open-sided shed on the northwest corner of the Site. The de-icing material pile is covered with a plastic tarp whenever it's not actively being used.

4.4 **Spills and Leaks**

Under the GP, Section 4.3.2.4(b), Amgraph is required to document any spills or leaks of five (5) gallons or more of petroleum products, or of toxic or hazardous substances that could affect stormwater. A log for documenting spills is provided in Appendix D, Spill Recordkeeping Log, and should be maintained for the life of this Plan.

5. MEASURES AND CONTROLS

Control measures implemented by Amgraph include BMPs and other structural and non-structural practices which are used to prevent or minimize the discharge of pollutants to stormwater. A combination of management procedures, structural controls, and employee training provides the most effective means of stormwater management. The GP contains a list of control measures and inspection frequencies that are expected to be in place to minimize the discharge of pollutants in stormwater runoff from the Site. This section details the control measures in place and management practices that should be implemented at Amgraph.

5.1 Good Housekeeping

In general, good housekeeping practices are designed to maintain a clean and orderly work environment. Poor housekeeping in areas that are exposed to rainfall can result in an increased potential for stormwater contamination. A clean and orderly site reduces the possibility of accidental spills caused by mishandling of chemicals and equipment, and should reduce safety hazards to Site personnel. Well maintained material and chemical storage areas will reduce the possibility of stormwater being exposed to pollutants. The following is a list of good housekeeping practices that should be implemented at the Site:

- Sweep or vacuum at regular intervals or, alternatively, wash down the area and collect and/or treat, and properly dispose of the washwater.
- Store materials in appropriate containers. Liquid materials require appropriate secondary containment and cover.
- Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.
- Ensure that all dumpsters, trash compactors, and roll-off containers used to store waste or recyclable materials are in sound, watertight condition and have covers and drain plugs intact, are in roofed areas or in secondary containment areas that will prevent exposure to rainfall.
- All covers on dumpsters not under a roof must be closed when dumpsters are not being loaded or unloaded.
- Loading docks (excluding those that allow a vehicle to enter the building) must be protected with a permanent roof or other structure that protects the loading dock from direct rainfall.

- Stormwater collection and drainage facilities adjacent to the loading dock must be designed and maintained in a way that prevents any materials spilled or released at the loading dock from discharging to the storm sewer system.
- Drains located directly beneath the loading dock must be routinely inspected for the accumulation of sludge, sediment, grit, tailings, trash, and any other debris. Drains must be cleaned out when the depth of debris reaches half of depth of the drain.
- Eliminate or otherwise seal floor drains which are connected to a storm sewer system or if the connection is unknown.
- Identify roof areas that may be subject to drippage, dust or particulates from exhausts or vents or other sources of pollution. Inspect such areas to determine if any potential sources of stormwater pollution are present, and if so, minimize the sources or potential sources of pollution.
- Facilities that handle pre-production plastic must implement control measures to eliminate discharges of plastic in stormwater. Examples of plastic material required to be addressed as stormwater pollutants include plastic resin pellets, powders, flakes, additives, regrind, scrap, waste, and recycling.

5.2 Preventive Maintenance (PM)

PM activities, as outlined in the GP, include the following:

- Inspection and maintenance of stormwater management devices (e.g., cleaning stormwater treatment devices, catch basins) that could fail and result in contamination of stormwater.
- Visual inspection, maintenance, and/or testing of on-site equipment and systems to identify conditions that could cause breakdowns or failures resulting in discharges of pollutants to stormwater.
- Maintaining non-structural control measures, such as keeping spill response supplies available, and ensuring that personnel are appropriately trained.
- Cleaning catch basins when the depth of debris reaches half of the sump depth and keeping the debris surface at least six inches below the lowest outlet pipe.

The Maintenance & Reliability Planner/Environmental is responsible for PM at the Site. PM activities performed by Amgraph include:

- Monthly visual inspections of areas covered by the requirements of the GP.
- Monthly inspections and annual preventative maintenance of the HVAC units and heating systems, performed by HVAC USA.
- Catch basin cleaning on an as-needed basis, performed by an outside contractor.
- Roof drain cleaning as necessary, based on conditions observed during monthly and/or semiannual inspections, performed by a PPT Member or designated facility personnel.

- Monthly and annual cleaning of oil filters, drip pan, and grease trap associated with the facility's plastic extruder.

All maintenance records for the site are maintained electronically by the Maintenance & Reliability Planner/Environmental. Records for the repair and maintenance of stormwater control measures should include date(s) of regular maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure(s) returned to full function, and the justification for any extended maintenance/repair schedules.

5.3 Spill Response Procedures

Amgraph will maintain emergency response procedures in order to minimize hazards to human health or the environment caused by fires, explosions, or any unplanned release of oil products or toxic or hazardous substances. In the event of a release or spill, Amgraph will follow the Spill Response Procedures provided in Appendix E of this Plan. Amgraph employees are only authorized to respond to incidental releases as defined by the Occupational Safety and Health Administration (OSHA) in 29 Code of Federal Regulations (CFR) 1910.120. In the event of a non-incidental release, Amgraph will contact Kropp Environmental to mitigate the release.

For any spill, leak, release, or discharge of non-stormwater not authorized by the GP or another permit, the PPT leader should report it to the CT DEEP Emergency Response and Spill Prevention by calling **860-424-3338 or 866-DEP-SPIL (866-337-7745, toll free),** 24 hours/day. Signs with emergency contact information should be posted throughout the Site.

In the event of an oil discharge to navigable waters or adjoining shorelines, the spill must be reported to the National Response Center (NRC) at 800-424-8802.

5.4 Employee Training

All employees whose activities may affect stormwater quality must receive training within 90 days of employment and at least once a year thereafter. Employees who should receive training include but are not limited to: PPT members; employees responsible for implementing activities necessary to meet the conditions of the GP (e.g., inspectors, maintenance personnel); and, employees who work in areas where industrial materials or activities are exposed to stormwater.

The PPT leader is responsible for organizing an adequate stormwater training program. Training must be conducted or supervised by a member of the PPT or other qualified person and a written record of training must be maintained in Appendix F, Training Records, including the dates of training, employee name, employee responsibility, and training agenda.

If related to the scope of their job duties, personnel must be trained in at least the following:

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

The PPT leader must also ensure the following personnel understand the requirements of the GP and their specific responsibilities with respect to those requirements:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges;
- Personnel who are responsible for conducting and documenting inspections and monitoring; and,
- Personnel who are responsible for taking and documenting corrective actions.

5.5 Sediment and Erosion Control

As required by the GP, Section 4.2.9, Amgraph must identify areas of the Site that have a potential for soil erosion due to topography, activities, or other factors, and must include measures to limit erosion and stabilize such areas. The retention basin is susceptible to erosion due to steep side slopes. The slopes are stabilized with erosion control fabric, and most areas support established vegetation.

No other areas susceptible to erosion or showing signs of erosion were observed during all comprehensive inspections. No polymers or other chemical treatments for erosion and sediment control are in use at the Site.

5.6 Management of Runoff

Runoff management at the Site consists of roof drains and catch basins that collect and convey stormwater to designated outfalls located in the retention basin. The Site is also graded to guide runoff from paved surfaces to vegetated and crushed stone landscaped areas.

Stormwater management practices that are considered appropriate to Amgraph are as follows:

- Roof drains should be inspected and maintained properly.
- Roof areas should be inspected at least monthly to verify that roof drains are free of debris and to identify any signs of leaks or material accumulation from HVAC units or process vents.
- Catch basins should be inspected at least monthly to verify that the depth of debris is less than half of the sump depth, and the debris surface is at least six inches below the lowest outlet pipe.
- All paved access roads parking areas, and truck routes designed to minimize erosion should be periodically swept and properly maintained. Unpaved areas should be regularly monitored to ensure erosion remains minimal.

5.7 Equipment and Vehicle Washing

Exterior equipment or vehicle washing does not take place at the Site.

5.8 Future Construction

Any construction activity that disturbs greater than one acre must be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (as amended), including the creation of a Stormwater Pollution Control Plan. All construction activities, regardless of size, shall comply with the Connecticut 2002 Guidelines for Soil Erosion and Sediment Control during construction and the 2004 Stormwater Quality Manual for the design and implementation of post-construction stormwater management measures. In addition, Amgraph must avoid, wherever possible, the use of copper or galvanized roofing or building materials where these materials will be exposed to stormwater.

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 (PE).

5.9 Resilience Measures

Amgraph will consider the resilience measures outlined in Section 4.2.3.8 of the GP when selecting and designing new stormwater control measures.

6. INSPECTIONS

The GP requires two types of inspections: routine inspections that must be conducted monthly, and comprehensive site inspections that must be conducted semiannually. The primary purpose of these inspections is to ensure that management practices and control measures prescribed in this Plan are being implemented correctly and effectively. In addition, the inspections can help determine if changes to stormwater management practices and controls measures need to be made due to changes at the Site. Inspections must be performed by qualified personnel. Routine inspections and semiannual inspections will be conducted by the Maintenance & Reliability Planner/Environmental.

6.1 Routine Inspections

The Site shall complete the required routine inspections on a monthly basis. At least one routine inspection per calendar year must be conducted while a stormwater discharge is occurring. A Monthly Inspection Form is provided in Appendix G to facilitate and document the completion of the inspections.

During normal operating hours, Amgraph must conduct inspections of areas covered by the requirements in the GP, including, but not limited to, the following:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in this Plan and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past three years;
- Stormwater discharge points; and,
- Control measures used to comply with the effluent limits contained in the GP.

Copies of the completed inspection forms should be maintained in Appendix G of this Plan for a period of no less than five (5) years after the date that coverage under the GP expires or is terminated.

6.2 Semiannual Comprehensive Compliance Evaluations

In accordance with the requirements of the GP, Section 4.4.3, Comprehensive Site Compliance Evaluations must be performed at the Site on a semiannual basis (twice per year). These evaluations should be conducted during a rainfall event if possible. They should consist of a documentation review, interviews with Site personnel, and a visual inspection of the Site. A Semiannual Comprehensive Compliance Evaluation Form is provided in Appendix H. During

normal operating hours, Amgraph must conduct inspections of areas of the Site covered by the requirements in the GP, including, but not limited to, the following:

- Drainage areas;
- Buildings, structures, permanent cover, and impervious area;
- Control measures used to comply with the effluent limits contained in the GP;
- Structural control measures;
- Non-structural stormwater control measures;
- Stormwater Management Systems;
- Stormwater discharge points (include all substantially identical discharge points (SIDPs);
- Areas where industrial materials or activities are exposed to stormwater;
- Vehicle and equipment fueling, maintenance, cleaning, and storage areas;
- De-icing material storage areas;
- Industrial materials storage areas;
- Materials handling activities areas;
- Other areas where industrial activity has taken place;
- Areas identified in the SWPPP and those that are potential pollutant sources;
- Spill prevention and response procedures (e.g., presence of spill kits and dry clean-up
- methods); and,
- Resilience measures.

Completed forms must be maintained as a part of this Plan in Appendix H for a period of no less than five (5) years after the date that coverage under the GP expires or is terminated.

6.3 Inspection Follow-Up

Upon completion of each inspection, the routine inspection logs or semiannual inspection reports must be reviewed by the PPT leader to identify observations or unsatisfactory conditions that require remedial action. The PPT leader is responsible for ensuring that appropriate actions are taken to remedy unsatisfactory conditions in a timely manner. Any corrective actions taken should also be recorded on the inspection forms.

7. STORMWATER MONITORING PROGRAM

The GP requires Amgraph to perform stormwater outfall monitoring. Amgraph operates under SIC Code 2759, and therefore is subject to the monitoring requirements for Sector X (Printing and Publishing) under Section 8.24 of the GP. The monitoring requirements are detailed in the following subsections. Stormwater monitoring will be conducted by the Maintenance & Reliability Planner/Environmental.

A summary of the stormwater discharge sampling data that was collected by Amgraph under the previous permit (*General Permit for the Discharge of Stormwater Associated with Industrial Activity*) is provided in Appendix I, Summary of Monitoring During Previous Permit Term.

7.1 Stormwater Sampling Locations

As described in Section 4.1 of this Plan, the Site has one (1) point source discharge of stormwater, consisting of a stone spillway located on the northwest side of the retention basin. This discharge conveys combined flows from two inlet pipes to the basin, designated as Outfall 001 and Outfall 002. Outfall 001 serves Drainage Area 001 and is a corrugated plastic pipe (CPP) located on the north side of the retention basin. Outfall 002 serves Drainage Area 002 and is a flared-end concrete pipe located immediately adjacent to (east/right of) Outfall 001 within the retention basin.

There are two other inlet pipes to the retention basin which are believed to be abandoned and not connected to the stormwater conveyance system. Amgraph has monitored these inlet pipes during heavy rainfall and observed no discharge.

The Site does not discharge within 500 feet of a tidal wetland. The stormwater from the Site is conveyed to a retention basin located on the northwest corner of the facility. Effluent from the basin has the potential to discharge to a wooded wetland located on the west side of the Site. However, stormwater normally infiltrates into the ground within the basin, resulting in no discharge to the wooded wetland.

The wetland eventually discharges to Little River (CT3805-00-2), which is classified as Class B according to the most recent (October 2018) Water Quality Classification Map of Sprague created by CT DEEP. Little River is designated as an impaired water of Connecticut for mercury, whole effluent toxicity (WET), and polychlorinated biphenyls (PCBS). This waterbody does not have a Total Maximum Daily Load (TMDL).

7.2 Stormwater Monitoring Procedures

The following sampling procedures must be followed during the quarterly, semiannual, and annual sampling events:

- Samples can only be collected from a storm event that occurs at least 72 hours after the last previous storm event generating a stormwater discharge from the Site.
- For sites that discharge through a detention basin or other stormwater management structure, the sample must be taken at the discharge from the basin or structure.
- Grab samples shall be used for all monitoring and shall not be commingled or combined with other waste streams.
- Collection of grab samples must begin within the first 30 minutes of stormwater being discharged at the sampling location and must be completed as soon as possible. If collection is more than 30 minutes after discharge begins, the reason for the delay must be documented on the sampling form and in Appendix J, Deviations from Monitoring Schedule.
- Samples must be collected at the designated outfalls or at the nearest feasible location representative of the discharge if the designated sampling location is inaccessible.
- All samples for a monitoring event must be taken during the same storm event, if feasible.

The following information must be collected and recorded for the storm events monitored:

- The 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; and,
- The results of all analyses.

7.3 Quarterly Visual Assessment

Once each quarter for the entire permit term, Amgraph must collect stormwater discharge samples from the sample locations designated in Section 7.1 of this Plan and conduct a visual assessment for specific water quality characteristics. For monitoring purposes, the quarters begin on January 1st, April 1st, July 1st, and October 1st. If the Site is subject to snowfall during one or more of these quarters, at least one quarterly visual assessment must capture snowmelt discharge if feasible and the corresponding form should be annotated to indicate this.

The visual assessment must be made with the sample in a clean, colorless glass or plastic container and in a well-lit area. During the assessment, the sample must be qualitatively evaluated for the following water quality characteristics:

- Color;
- Odor;
- Clarity (diminished);
- Floating solids;
- Settled solids;
- Suspended solids;
- Foam;
- Oil sheen; and,
- Other obvious indicators of stormwater pollution.

A Quarterly Visual Assessment Form is included in Appendix K. This form can be used to document the results of each visual assessment event. If unsatisfactory water quality characteristics are observed during a visual assessment, this may indicate that the stormwater pollution control measures at the Site are inadequate or are not being properly implemented or maintained. After an unsatisfactory assessment, Amgraph must review and revise this Plan as appropriate, following the corrective action schedule in Section 8.2 of this Plan. A monitoring remedial action log is also included in Appendix K. This form should be used to document any corrective actions or changes in control measures completed as result of an unsatisfactory visual assessment.

If Amgraph is unable to collect a visual assessment sample during an entire sampling quarter, the circumstances pertaining to this must be documented and the documentation must be maintained in Appendix J of this Plan.

7.4 Benchmark and Toxicity Monitoring

In addition to quarterly visual assessments, Amgraph must perform benchmark stormwater monitoring for the parameters listed in Table 7-1, Summary of Sector X Monitoring Requirements, at the specified frequencies.

The first semiannual benchmark monitoring event of each sampling year must be conducted between January 1st and June 30th, and the second must be conducted between July 1st and December 31st. Monitoring events must be separated by at least 30 days. The semiannual stormwater samples may be collected along with the quarterly visual samples. As with the quarterly visual assessment, the stormwater discharge samples must be collected from the sample locations designated in Section 7.1 of this Plan.

7.5 Aquatic Toxicity Monitoring

Annual aquatic toxicity monitoring must be performed in the first year after receiving the Notice of Coverage from CT DEEP's Commissioner. Aquatic Toxicity must be included in a regularly scheduled semiannual sample.

7.6 Monitoring of Discharges to Impaired Waters

Impaired waters are waterbodies that have been assessed by CT DEEP as not meeting Connecticut's Water Quality Standards for a given designated use such as fish and wildlife habitat, recreation, or agricultural and industrial supply. According to the GP, industrial activities that discharge directly to impaired waters, as identified by CT DEEP, must conduct stormwater monitoring in addition to the standard benchmark monitoring discussed in Section 7.4 of this Plan.

All fresh waterbodies in the state of Connecticut are considered impaired for fish consumption due to atmospheric deposition of mercury. Sites where stormwater is or could be exposed to sources of mercury must monitor for mercury once per year. Due to the operations conducted by Amgraph, the Site does not have the potential to contaminate stormwater with mercury and therefore no additional monitoring for mercury is required.

In order to achieve water quality standards for dissolved oxygen in Long Island Sound, a statewide limit has been implemented by CT DEEP to address nitrogen loading to the Sound. Monitoring for nitrogen in stormwater runoff, in the form of nitrate and total Kjeldahl nitrogen, is already required by the GP.

Based on a review of CT DEEP's list of impaired waters, none of the Site's drainage areas discharge directly into any impaired waters, so no additional monitoring is required.

7.7 Test Procedures

The following testing procedures must be followed:

- All pollutant parameters must be tested according to methods pursuant to 40 CFR 136 for the analysis of pollutants having approved methods under that part, unless a method is required under 40 CFR Subchapter N or unless an alternative method has been approved in writing pursuant to 40 CFR 136.5.
- Acute toxicity biomonitoring tests must 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 (Environmental Protection Agency (EPA) 821-R-02-012).

A list of the required monitoring parameters should be submitted to the analyzing laboratory prior to a sampling event, so that the lab can supply Amgraph with the necessary collection containers. It is recommended that an extra set of containers be obtained in the event any are damaged during the sampling event or in transport from the laboratory. The laboratory may also provide coolers and corresponding paperwork such as a chain-of-custody form and sample container labels. Instructions for the proper completion of the corresponding paperwork may be obtained through the laboratory.

7.8 Evaluation of Benchmark Monitoring Results

As required by the GP, Section 4.5.1, the results of Amgraph's Semiannual Benchmark Monitoring must comply with the benchmarks for the parameters specified in Table 7-1. Amgraph must calculate the average of the monitoring results from the four (4) most recent sampling events for each of the parameters. For averaging purposes, if a parameter is detected at a concentration less than the analyzing laboratory's method detection limit, a value equal to half the method detection limit reported by the laboratory should be used. For sample values that fall between the method detection level and the reporting level (i.e., a confirmed detection but below the level that cannot be reliably quantified), a value equivalent to half the reporting level reported by the analyzing laboratory should be used. These averages must then be compared to the benchmark values listed in Table 7-1. If Amgraph fails to collect a sample during an entire semiannual benchmark monitoring period, monitoring results from preceding semiannual periods cannot be used for averaging purposes.

7.8.1 Data Not Exceeding Benchmarks

If the average of the four most recent consecutive semiannual monitoring results for any parameter is less than or equal to the benchmarks, Amgraph can discontinue monitoring for that parameter for a maximum of two (2) years. An exemption for sample pH cannot be earned until exemptions for all other parameters are met. Once Amgraph is able to discontinue monitoring for all parameters, CT DEEP should be notified of the change of monitoring frequency by email at DEEP.StormwaterIndustrial@ct.gov.

7.8.2 Data Exceeding Benchmarks

An exceedance occurs for a parameter if the average of four (4) consecutive semiannual monitoring values exceeds the benchmark threshold, or if fewer than four (4) samples have been collected but a but a single sample exceeds the benchmark threshold by more than four (4) times that parameter's threshold.

In the case of an exceedance, Amgraph must follow the corrective action schedule outlined in Section 8.3 of this Plan. Failure to conduct any required corrective actions after a benchmark exceedance occurs is a permit violation.

7.8.3 Off-Site Pollutant Levels

Following the first four (4) semiannual events of benchmark monitoring (or sooner if the exceedance is triggered by less than four (4) monitoring events), if the average concentration of a pollutant exceeds a benchmark value, and Amgraph determines that exceedance of the benchmark is attributable solely to the presence of that pollutant in "run-on" entering from off-site, Amgraph is not required to perform corrective actions or additional benchmark monitoring provided all of the following conditions are met:

- The average concentration of the benchmark monitoring results is less than or equal to the pollutant concentration in "run-on" entering from off-site (Including changes in pH due to rainfall).
- Amgraph documents and maintains with this Plan the supporting rationale for concluding that benchmark exceedances are in fact attributable solely to "run-on" entering from off-site, including any supporting rationale or any data previously collected by them or others.
- Amgraph demonstrates that the diversion of off-site run-on containing these pollutant levels is infeasible through engineering analysis.
- Amgraph notifies CT DEEP's Commissioner of the findings, and the Commissioner issues a written approval of the permittee's documentation demonstrating that the benchmark exceedances are attributable solely to off-site pollutant levels.

7.8.4 Inability to Collect a Sample

If a benchmark monitoring sample could not be collected during an entire semiannual monitoring period, a Discharge Monitoring Report (DMR) should still be submitted as per Section 7.9.1 of this Plan. In such a case, Amgraph must indicate in NetDMR any failure to monitor during the regular reporting period with an explanation of the limitations restricting the collection of an appropriate sample. The appropriate No Data Indicator code from the GP should be included on the DMR. Documentation should also be maintained in Appendix J. Reasons may include the absence of a 72-hour period of dry weather, the absence of a rain event that produces a stormwater discharge, the absence of a discharge from a detention or retention basin, or adverse weather conditions preventing access to the stormwater discharge location. The timing of a rain event is not an acceptable reason to fail to sample unless it precludes the analysis of a parameter within the acceptable hold time specified by a laboratory.

7.9 Reporting and Record Retention

7.9.1 Benchmark Monitoring

Amgraph will submit DMRs via email to DEEP.StormwaterIndustrial@ct.gov until the Notice of Coverage is received from CT DEEP's Commissioner. Following this, DMRs must be submitted to CT DEEP via NetDMR. Stormwater DMR forms must be submitted no later than 30 days after the end of the monitoring period. Aquatic toxicity testing results should be submitted in NetDMR along with the corresponding semiannual results.

7.9.2 Annual Report

An Annual Report summarizing monitoring data, site inspections, visual assessments, corrective actions, and noncompliance during the previous calendar year must be submitted to CT DEEP by April 15th of each year. A template for the Annual Report will be included in Appendix L, Annual Report Template. The Annual Report shall be submitted via email to DEEP.StormwaterIndustrial@ct.gov.

7.9.3 Records Retention

All records pertaining to stormwater monitoring activities including submitted DMR forms, laboratory reports, field data collection forms, and visual assessment records must be maintained in the appropriate location (Appendix M, Semiannual Monitoring Records, or Appendix K, Quarterly Visual Assessment Form) and retained for at least five (5) years beyond the expiration date of the GP.

7.9.4 Permit Noncompliance

Any incidences of GP noncompliance should be recorded. If there is an incidence of noncompliance that constitutes a permit violation, Amgraph should notify CT DEEP's Commissioner via the Online Noncompliance Reporting web-based platform.

8. CORRECTIVE ACTIONS

8.1 Conditions Requiring Corrective Actions

When conditions requiring corrective actions occur or are detected through inspections, monitoring or other means, Amgraph must take the appropriate corrective actions. Failure to take corrective action is a violation of the GP. All corrective action documentation should be maintained in Appendix N, Corrective Action Measure Documentation. The form in Appendix N should be filled out for any of the following conditions which require corrective actions:

- A discharge or representative discharge exceeds an applicable benchmark threshold in Table 7-1 after four consecutive semiannual measurements (or is mathematically certain to do so after less than four measurements)
- A spill, leak, release, or discharge of non-stormwater not authorized by the GP or another permit
- 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
- A required control measure was never designed, installed, implemented, or maintained
- Construction or a change in design, operation, or maintenance at the Site occurs that significantly changes the nature or quantity of pollutants discharged
- Color, odor, floating solids, settled solids, suspended solids, or foam observed in discharge water
- CT DEEP's Commissioner may utilize enforcement discretion to require additional corrective actions in response to permit violations

The specific corrective action requirements for each of the above conditions are laid out in GP Section 4.6.

8.2 Corrective Action Schedule

When Corrective Action Measures (CAMs) are necessary, they must be taken according to the following schedule. If corrective actions result in changes to any of the controls or procedures documented in the SWPPP, Amgraph must modify the SWPPP accordingly within fourteen (14) calendar days of completing corrective action work.

8.2.1 Immediate Actions (Within 1-2 Days)

If corrective action is needed, the permittee must immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.

8.2.2 Subsequent Actions (Within 14-60 Days)

If additional actions are necessary (e.g., installing a new or modified control measure or completing a repair), they must 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 not feasible to complete the corrective action within fourteen (14) calendar days, Amgraph must document the reason why. They must also identify a schedule for completing the work, which must be done as soon as practicable but no longer than sixty (60) days after discovery. Documentation must be maintained within Appendix N of this Plan.

8.2.3 Extension (Greater than 60 Days)

If the completion of corrective actions will exceed the 60-day timeframe, Amgraph must document their intention to exceed 60 days, the rationale for an extension, and a completion date. Documentation must be maintained within Appendix N of this Plan.

If a structural control measure is needed for a level 3 corrective action measure, Amgraph may take up to one-hundred and twenty (120) days to install such measures. Any extension beyond this must be obtained from CT DEEP's Commissioner.

8.2.4 Follow-Up Sampling

For those corrective action triggering conditions that require or recommend follow-up sampling, Amgraph will have an additional thirty (30) calendar days (or until the next qualifying storm event, should none occur within thirty (30) calendar days) after implementing CAM Level 1, 2, or 3 to collect the follow-up sample. Once sampling results are received, the results must report be reported by email to DEEP.StormwaterIndustrial@ct.gov within thirty (30) days.

8.3 **CAM Levels**

Amgraph must enact the following corrective action measures when a corrective action triggering condition occurs. Corrective actions should follow the schedule above, and should be documented in Appendix N.

8.3.1 CAM Level 1: Review SWPPP and Stormwater Control Measures

Immediately review the SWPPP and the selection, design, installation, and implementation of the stormwater control measures to ensure the effectiveness of existing measures and determine if modifications are necessary to meet GP conditions. After the review, Amgraph must either:

- Implement additional measures, considering good engineering practices, that would reasonably be expected to address the triggering condition; or
- Determine nothing further needs to be done and document their rationale and include relevant information in the SWPPP as to why they expect the existing control measures and best management practices to be sufficient to meet permit requirements.

If subsequent inspections and/or follow-up monitoring data indicate that the triggering condition persists after the steps taken for CAM Level 1, CAM Level 2 is initiated.

8.3.2 CAM Level 2: SWPPP Review and Additional Stormwater Control Measures

Review the SWPPP again and implement additional pollution prevention/good housekeeping stormwater control measures beyond those already in place. Subsequent control measures should consider good engineering practices, beyond what was done in the initial response, that would reasonably be expected to be expected to control the release of pollutants.

If subsequent inspections and/or follow-up monitoring data indicate that the triggering condition persists for a third time after the steps taken for CAM Level 2, CAM Level 3 is initiated.

8.3.3 CAM Level 3: Implementation of Structural Control Measures

Install structural source controls (e.g., permanent controls such as permanent cover, berms, and secondary containment), and/or treatment controls (e.g., sand filters, hydrodynamic separators, oil-water separators, retention ponds, and infiltration structures, where applicable). The control measures, treatment technologies, or treatment train should be appropriate for the pollutants that triggered a CAM Level 3 should be more rigorous than the pollution prevention/good housekeeping-type stormwater control measures implemented under Level 2.

Amgraph must select controls with pollutant removal efficiencies that are sufficient to prevent or minimize pollution of stormwater. Amgraph must install such stormwater control measures for the discharge point(s) in question and for any discharge point represented by this point, unless they individually monitor those discharge points and demonstrates that Level 3 requirements are not required at those discharge points.

If the issue is still not resolved after CAM Level 3 actions, and further corrective actions are infeasible, Amgraph may request a waiver from further corrective actions and/or follow-up

monitoring. CT DEEP's commissioner will approve or deny the request and may notify Amgraph that coverage under an individual permit is necessary.

9. AMENDMENT AND DISTRIBUTION OF THIS PLAN

In accordance with conditions of the GP, this Plan must be amended under the any of the following conditions:

- There is a change at the Site which has an effect on the potential to cause pollution of the surface waters of the state.
- The actions required by this Plan fail to ensure or adequately protect against pollution of the surface waters of the state.
- CT DEEP's Commissioner requests modification of this Plan.
- Amgraph is notified that it is subject to requirements because the receiving water to which the industrial activity discharges has been designated as impaired under Section 303(d) of the Clean Water Act and as identified in the most recent State of Connecticut Integrated Water Quality Report.
- Amgraph is notified that a TMDL to which they are subject has been established for the receiving water to which the stormwater discharges.
- It is necessary to address any significant sources or potential sources of pollution identified as a result of any inspection or visual assessment.
- Amendment is required due to failure to meet the monitoring benchmarks of the GP.

This Plan must be amended, and all actions required by this Plan must be completed within 120 days (or within another interval as may be specified in the GP or as may be approved in writing by CT DEEP's Commissioner) of the date Amgraph becomes aware or should have become aware that any of the conditions listed above has occurred. Any changes to this Plan should be recorded on Appendix O, SWPPP Revision Log.

9.1 Recertification of this Plan

If significant changes are made to the Site or to this Plan in accordance with the conditions for amendment of this Plan listed in Section 8 above, this Plan must be recertified in accordance with the "Non-Stormwater Discharges" and "Plan Certification" sections of the GP, by a Qualified Professional as defined in the GP. Amgraph must maintain compliance with such Plan thereafter.

9.2 Distribution of this Plan

An up-to-date copy of this Plan is maintained by the PPT leader and accessible to key management, supervisors, and members of the PPT.

9.3 Plan Availability

According to the GP, Section 3.12.1, Amgraph must make a copy of their registration under the GP available electronically on their official website for public review.

If available, on or before thirty (30) days of receipt of a registration and SWPPP, CT DEEP's Commissioner shall post the SWPPP on the CT DEEP website for public review and comment If Amgraph claims that certain elements of this Plan constitute a trade secret or are otherwise exempt from the disclosure requirements of the state Freedom of Information Act (FOIA) (Section 1-210 et Seq of the Connecticut General Statutes), Amgraph must follow the procedures provided in the GP registration form instructions regarding information subject to FOIA requirements.

TABLES

TABLE 4-2 INVENTORY OF EXPOSED MATERIALS

Drainage Area	Location of Potential Pollutant Source	Activity Generating Potential Pollutant	Pollutants Associated With Source	Method of Storage/Extent of Exposure	Control Measures	Method of Disposal, if Applicable	Outfall(s) Affected by Potential Spills or Leaks
001	1963 and 1974 roof sections.	HVAC units	TSS, O&G	Rooftop unit	• Monthly inspections • Preventative maintenance	NA	Outfall 001
	1963 and 1974 roof sections	Exhaust vents from printing presses, ovens, and treaters	VOCs	Rooftop vents	• Monthly inspections	NA	
	1963 roof section	Boiler room exhaust vents	VOCs, PM.	Rooftop vent	• Monthly inspections	NA	
	1963 roof section	Exhaust vents and grease traps from extruders	O&G	Rooftop units	• Monthly inspections • Good housekeeping practices	Waste oil shipped out after monthly and annual maintenance.	
	North section of the Site	Receiving of raw materials/chemicals and shipping of waste	O&G, TSS, VOCs	Materials are only exposed to precipitation during loading/unloading activities	• Good housekeeping practices • Monthly inspections • Loading/offloading procedures • Spill response procedures and training	Disposal only occurs in the event of a spill, and it's done in accordance with facility procedures.	
	North section of the Site	Plant refuse and cardboard compactor	O&G, TSS	Enclosed compactor	• Monthly inspections • Good housekeeping practices	Waste shipped out when full.	

Drainage Area	Location of Potential Pollutant Source	Activity Generating Potential Pollutant	Pollutants Associated With Source	Method of Storage/Extent of Exposure	Control Measures	Method of Disposal, if Applicable	Outfall(s) Affected by Potential Spills or Leaks
001	North section of the Site	Dumpsters	TSS	Stored under covered loading dock	• Monthly inspections • Good housekeeping practices	Waste shipped out when full.	Outfall 001
	North section of the Site	Empty drums & totes, wood & metal pallets	TSS, O&G	Stored under covered loading dock	• Monthly inspections • Good housekeeping practices	NA	
	North section of the Site	Overflow tanks for the ink room	VOCs, Solvents, Inks	Enclosed tanks	• Monthly inspections • Spill response procedures and training	Waste shipped out when full.	
	North section of the Site	Fire pump & 300-gal diesel tank	O&G	Enclosed shed	• Monthly inspections • Loading/offloading procedures • Spill response procedures and training	NA	
	North section of the Site	100-gal diesel utility tank	O&G	Enclosed tank under covered loading dock	• Monthly inspections • Spill response procedures and training	NA	
	North section of the Site	Plastic resin silos	TSS	Enclosed equipment	• Monthly inspections • Loading/offloading procedures	Disposal only occurs in the event of a spill, and it's done in accordance with facility procedures.	

TABLE 4-2 INVENTORY OF EXPOSED MATERIALS

Drainage Area	Location of Potential Pollutant Source	Activity Generating Potential Pollutant	Pollutants Associated With Source	Method of Storage/Extent of Exposure	Control Measures	Method of Disposal, if Applicable	Outfall(s) Affected by Potential Spills or Leaks
001	North section of the Site	Vehicle traffic	TSS, O&G	Paved driveway and parking area	• Good housekeeping practices	NA	Outfall 001
002	Northwestern corner of the Site	Salt/sand mixture pile	TSS	Enclosed in an open-sided shed, protected from precipitation	• Monthly inspections • Good housekeeping practices	NA	Outfall 002
	North section of the Site	Receiving of raw materials/chemicals and shipping of waste	O&G, TSS, VOCs	Materials are only exposed to precipitation during loading/unloading activities	• Good housekeeping practices • Monthly inspections • Spill response procedures and training	Disposal only occurs in the event of a spill, and it's done in accordance with facility procedures.	
	North section of the Site	Plant refuse and cardboard compactor	O&G, TSS	Enclosed compactor	• Monthly inspections • Good housekeeping practices	Waste shipped out when full.	
	Northwestern corner of the Site	Storage trailers & scrap metal	TSS	Enclosed trailers. Scrap metal is exposed to precipitation	• Monthly inspections • Good housekeeping practices	N/A	
003	Along South Paved Road	Electrical transformers & vehicle traffic	O&G	Transformers & paved driveway	• Monthly Inspections	NA	NA

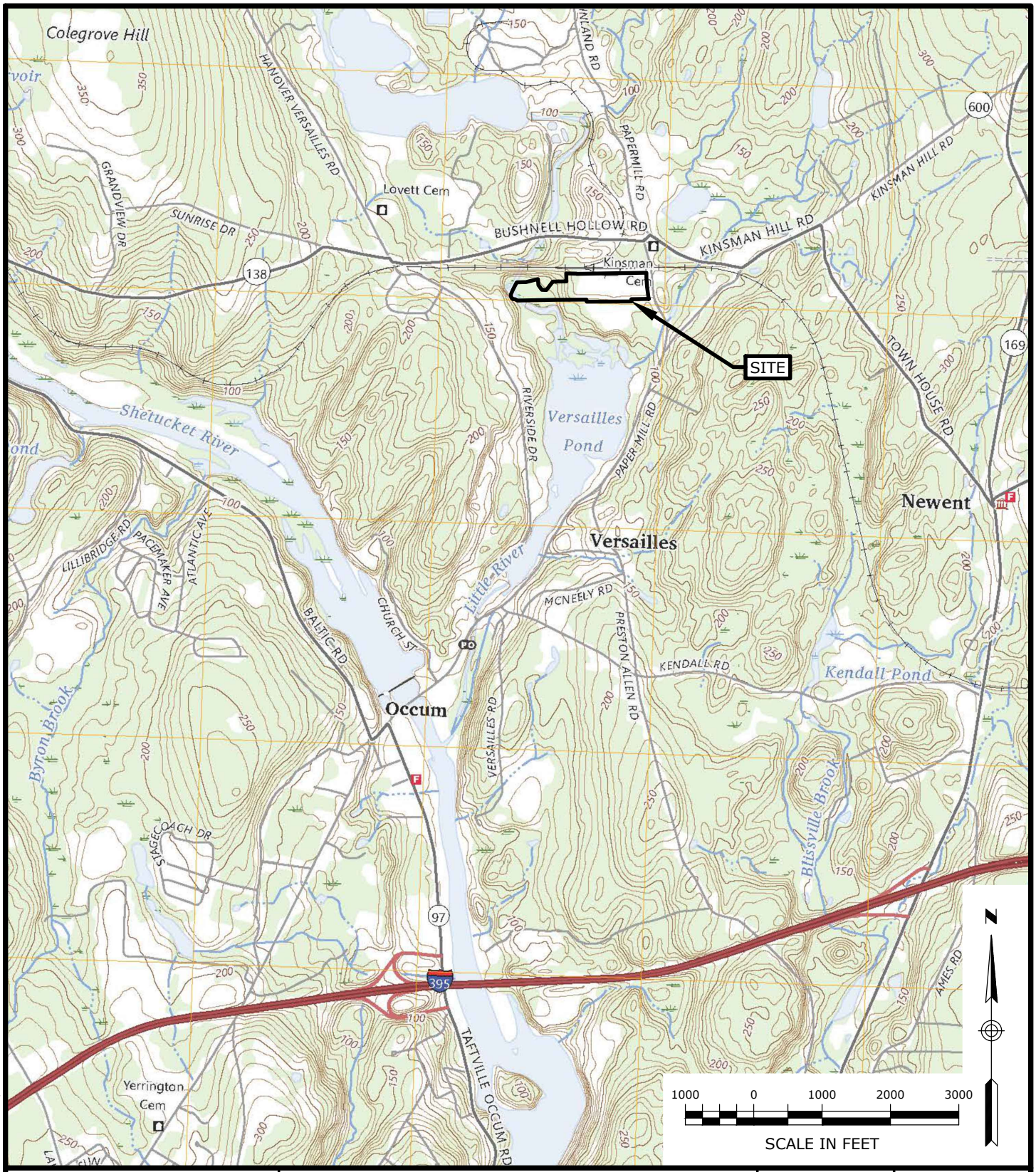
TABLE 7-1 SUMMARY OF SECTOR X MONITORING REQUIREMENTS

All Monitoring Requirements for Sector X (Printing and Publishing)				
MONITORING TYPE	INDUSTRIAL ACTIVITY	SCHEDULE	PARAMETER	THRESHOLD OR LIMIT
BENCHMARK GP, Section 4.5.1	Applies to all Sector X facilities	Semiannually until requirements for benchmark monitoring exemption are met[1]	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 (NO_3-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 GP, Section 4.5.2	Applies to all Sector X facilities	No additional monitoring for Sector X		
EFFLUENT LIMITS GP, Section 4.5.3	Applies to all Sector X facilities	No effluent limits for Sector X		
AQUATIC TOXICITY GP, Section 4.5.4	Applies to all Sector X facilities	Once in the permit term[3]	LC_{50} for *Daphnia pulex*	None
IMPAIRED WATERS GP, Section 4.5.5	Applies to all Sector X facilities	Annually	N/A	

[1] Facilities may qualify for benchmark exemptions for a maximum of 2 years at a time (in addition to GP, Section 4.5.1).
[2] DEEP Water Quality Plans and Assessment Map: https://portal.ct.gov/DEEP/Water/Water-Quality/Water-Quality-305b-Report-to-Congress.
[3] Aquatic toxicity testing shall be performed in the first year after receiving the Notice of Coverage from CT DEEP's Commissioner and the results shall be reported in NetDMR.

FIGURE 1

USGS Site Location Map



Loureiro

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SITE LOCATION MAP

STORMWATER POLLUTION PREVENTION PLAN

190 INLAND RD, LISBON, CT 06351

PREPARED FOR:

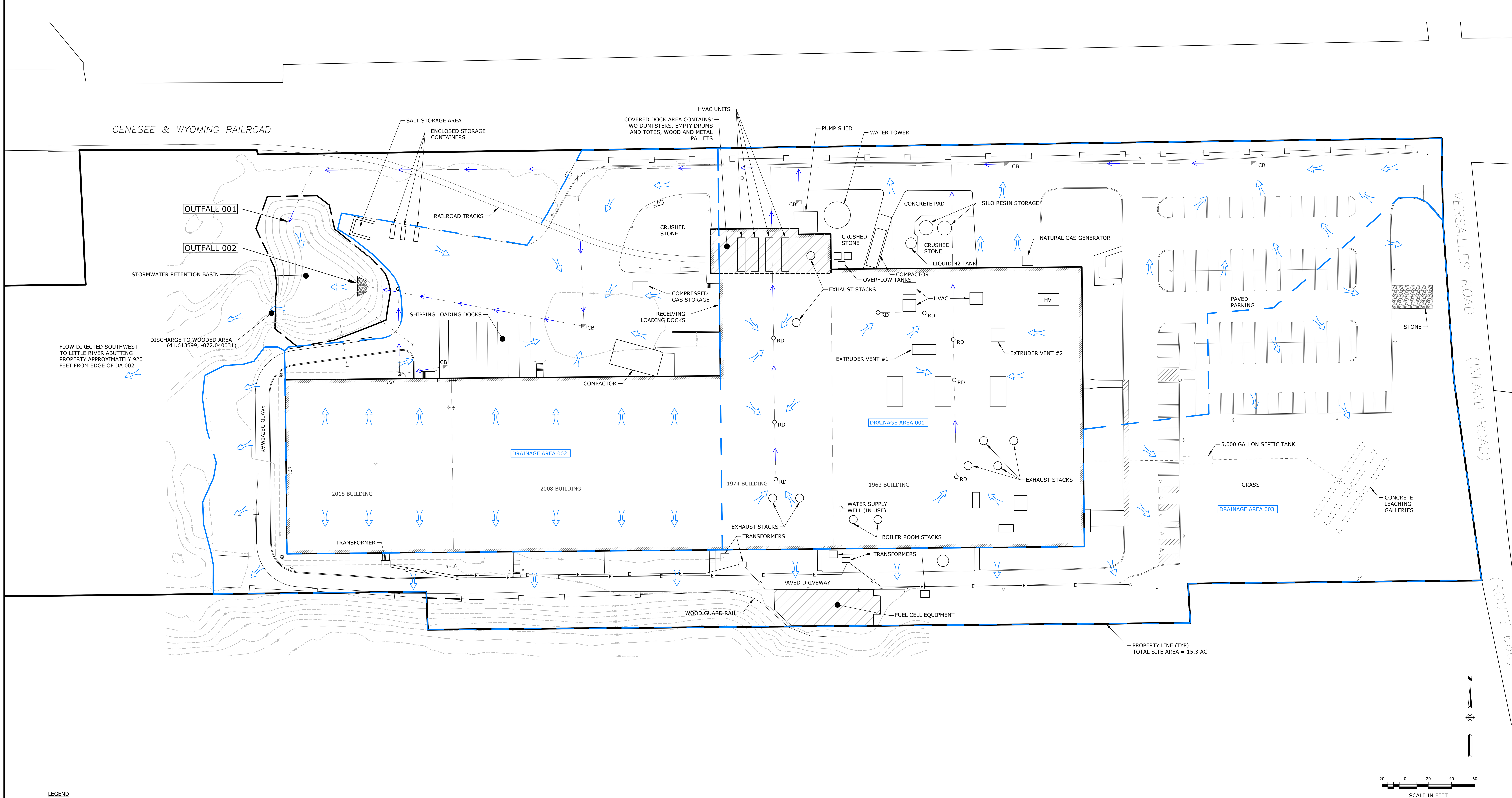
AMGRAPH PACKAGING, INC.

190 INLAND RD, LISBON, CT 06351

SCALE	DRAWING
1"=2,000'	**FIG 1**
COMM. NO.	
002AP5.02	
DATE	
03/12/2026	

DRAWING 1

Site Plan


GENESEE & WYOMING RAILROAD
SALT STORAGE AREA
ENCLOSED STORAGE CONTAINERS
COVERED DOCK AREA CONTAINS: TWO DUMPSTERS, EMPTY DRUMS AND TOTES, WOOD AND METAL PALLETS
HVAC UNITS
PUMP SHED
WATER TOWER
CB
CONCRETE PAD
SILO RESIN STORAGE
NATURAL GAS GENERATOR
VERSAILLES ROAD
(INLAND ROAD)
(ROUTE 660)
OUTFALL 001
OUTFALL 002
STORMWATER RETENTION BASIN
RAILROAD TRACKS
CRUSHED STONE
CRUSHED STONE
CRUSHED STONE
LIQUID N2 TANK
COMPACTOR
OVERFLOW TANKS
EXHAUST STACKS
HVAC
HV
RD
PAVED PARKING
STONE
COMPRESSED GAS STORAGE
RECEIVING LOADING DOCKS
SHIPPING LOADING DOCKS
DISCHARGE TO WOODED AREA (41.613599, -072.040031)
FLOW DIRECTED SOUTHWEST TO LITTLE RIVER ABUTTING PROPERTY APPROXIMATELY 920 FEET FROM EDGE OF DA 002
EXTRUDER VENT #1
EXTRUDER VENT #2
COMPACTOR
150'
PAVED DRIVEWAY
DRAINAGE AREA 001
DRAINAGE AREA 002
DRAINAGE AREA 003
5,000 GALLON SEPTIC TANK
2018 BUILDING
2008 BUILDING
1974 BUILDING
1963 BUILDING
EXHAUST STACKS
GRASS
CONCRETE LEACHING GALLERIES
WATER SUPPLY WELL (IN USE)
EXHAUST STACKS
BOILER ROOM STACKS
TRANSFORMER
TRANSFORMERS
TRANSFORMERS
PAVED DRIVEWAY
WOOD GUARD RAIL
FUEL CELL EQUIPMENT
PROPERTY LINE (TYP)
TOTAL SITE AREA = 15.3 AC
N
20 0 20 40 60
SCALE IN FEET

LEGEND

- CB — CATCH BASIN
- RD — ROOF DRAIN
- FLOW DIRECTION
- PIPE FLOW DIRECTION
- DRAINAGE AREA BOUNDARY
- STORM PIPE
- —200— CONTOUR

DRAINAGE AREA TABLE

DRAINAGE AREA	PERVIOUS AREA (AC)	IMPERVIOUS AREA (AC)	% IMPERVIOUS	DRAINAGE COEFFICIENT
001	0.27	3.29	92.4%	0.88
002	0.02	2.39	99.2%	0.94
003	2.13	0.94	30.6%	0.33

Total Acreage: 14.6

NOTES:
1. POLLUTION SOURCES CAN BE FOUND IN TABLE 4-2.
2. NO ENDANGERED SPECIES HABITATS LOCATED ON-SITE.
3. ALL LOCATIONS OF SITE FEATURES ARE APPROXIMATE. THIS PLAN SHOULD NOT BE USED FOR CONSTRUCTION OR LAND SURVEYANCE PURPOSES

REV.	DESCRIPTION OF REVISION	DATE	APPR.
1	REV Comment	08/25/1894	ESF

STAMP

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SCALE 1"=40'
COMM. NO. 002APS.04
DRAWN BY MIHN — DATE 01/20/2026
APPROVED BY MSG — DATE 01/20/2026

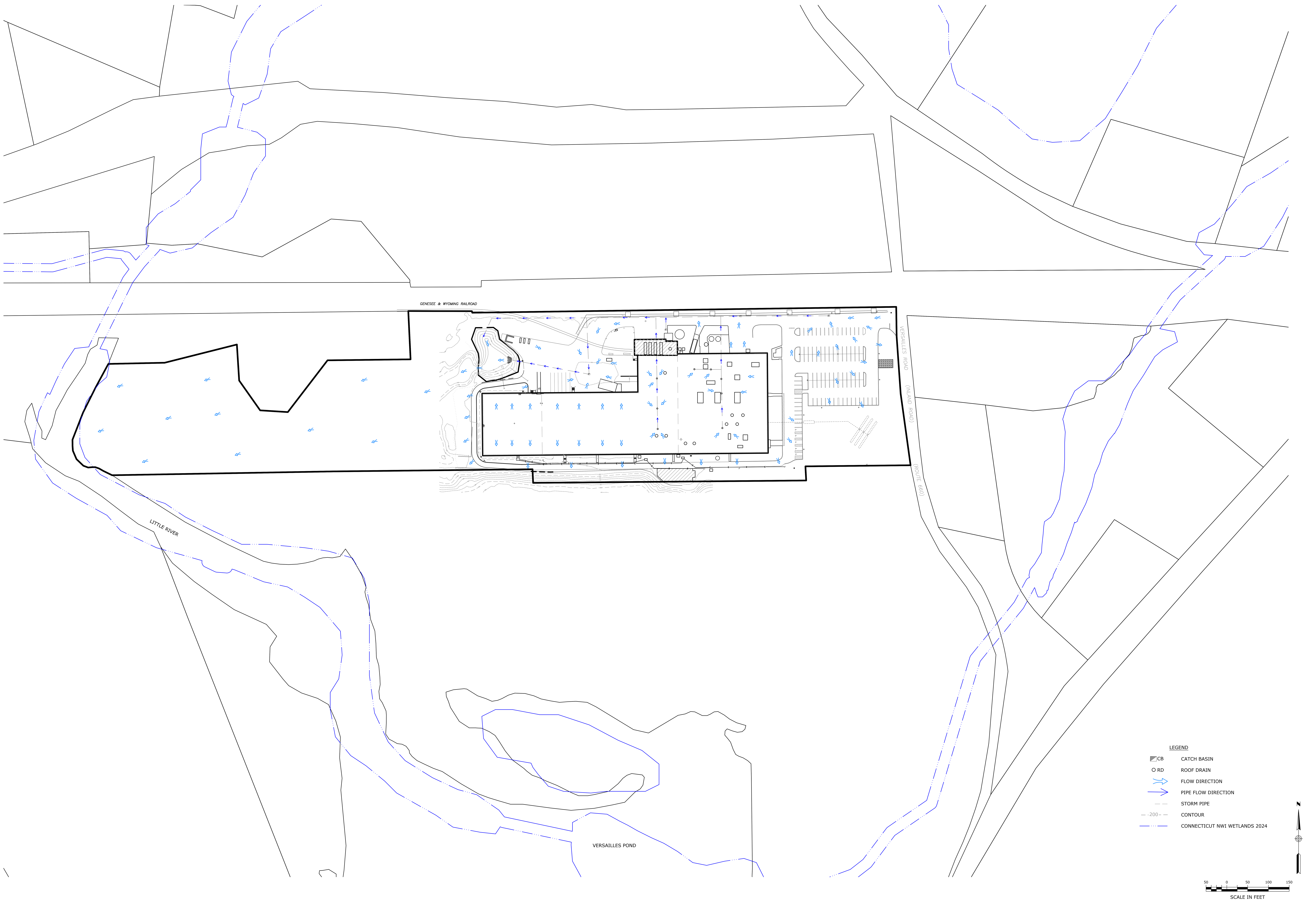
SITE MAP

STORMWATER POLLUTION PREVENTION PLAN
190 INLAND RD, LISBON, CT 06351
PREPARED FOR:
AMGRAPH PACKAGING, INC.
190 INLAND RD, LISBON, CT 06351

DRAWING 1
SHEET NO. 1 — NO. OF SHEETS 2

DRAWING 2

Site Property Map



REV.	DESCRIPTION OF REVISION	DATE	APPR.
1	REv Commnt	08/25/1894	ESF

STAMP

Loureiro

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SCALE 1"=100'
COMM. NO. 002AP5.04
DRAWN BY MIHN — DATE 01/20/2026
APPROVED BY MSG — DATE 01/20/2026

SITE MAP

STORMWATER POLLUTION PREVENTION PLAN
190 INLAND RD, LISBON, CT 06351

PREPARED FOR:

AMGRAPH PACKAGING, INC.
190 INLAND RD, LISBON, CT 06351

DRAWING 2

SHEET NO. 2 NO. OF SHEETS 2

V:\CT\BALTIC\PAPERMILL RD-90\SWPPP REVISION 2025_002AP5.04\DWGS\SWPPP.DWG Tab: SWPPP ENTIRE SITE Saved: 2/24/2026 10:04 AM by MIHNORRIS Paper Size: 24" x 36" Plotted: 2/24/2026 10:04 AM

APPENDIX A

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

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

At the time of the certification of this SWPPP, the GP is available at https://portal.ct.gov/-/media/deep/water_regulating_and_discharges/stormwater/industrial/2025-permit-documents/2025-industrial-stormwater-general-permit-part-1--2erc.pdf?rev=e07e4c0e8e9942cfb424954fe5bc89e5&hash=CFF6E87399495EA4981CB0C8949F43CD

A copy of the GP is also included in a separate document to be kept with this Plan. This copy of the GP only includes the sector-specific requirements for Sector X.

APPENDIX B

General Permit Registration

APPENDIX C

Certification of Non-Stormwater Discharges Supporting Information

Certification of Non-Stormwater Discharges Supporting Information

An evaluation for unauthorized non-stormwater discharges was performed by Loureiro on November 20, 2025, during dry weather conditions. The assessment included employee interviews and a visual inspection of the grounds, catch basins, stormwater retention basin, and discharge points.

Loureiro observed interior floor drains located in the boiler room and the ink room. Amgraph confirmed that boiler room drains convey boiler blowdown to a designated holding tank, and ink room drains direct potential spills to exterior overflow tanks. No evidence of unauthorized non-stormwater discharges was observed during the evaluation.

The following areas were directly observed during the evaluation:

- The three (3) catch basins in Drainage Area 001, and the associated discharge point (Outfall 001);
- The two (2) catch basins in Drainage Area 002, and the associated discharge point (Outfall 002);
- Roof areas and roof drains in Drainage Areas 001 and 002;
- The stormwater retention basin located at the northwest corner of the Site; and,
- All paved areas of the Site.

APPENDIX D

Log of Significant Spills and Leaks (≥5 gallons)

Log of Significant Spills and Leaks (≥5 gallons)

Date and Time	Location	Description				Response Procedures	Corrective Measures Taken
		Type of Material	Quantity	Source	Reason		
June 12, 2024	Finger Pier	Slop oil	10-15 gal	Scrap metal drum	The drum was lifted and tossed into the scrap metal dumpster. Operators were not aware that slop oil was present in the drum.	The spill was contained and cleaned up using speedy dry. Surrounding areas were inspected to verify no oil had been discharged into catch basins.	Scrap metal drums must be inspected for any signs of oil residue before scrap metal is dumped into the metal dumpster.
February 17, 2025 10:30 AM	Drent Warehouse	Americal Genesis Think Foundation Solution	Approx. 10 gal.	55-gal drum.	Damage to plastic drum from the weld beads on the rolling cart.	SDS review of material spilled and prompt clean-up.	Stop the use of metal style carts to transport plastic drums.

Log of Significant Spills and Leaks (≥5 gallons)

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

APPENDIX E

Spill Response Procedures

Spill Response Procedures

These spill response procedures apply to incidental releases of oil or chemicals that can be safely managed by trained facility personnel. Releases that present an immediate danger to life or health, involve unknown substances, or cannot be safely controlled must be treated as an emergency and responded to by outside emergency responders and/or licensed spill response contractors.

Discovery of Release

Any person discovering a release of oil or chemical products to soil, surface water, paved surfaces, structures, or drainage systems shall immediately notify the Pollution Prevention Team (PPT) Leader. If the PPT Leader is unavailable, an alternate PPT Member or other responsible personnel shall be notified.

The individual discovering the release shall not attempt cleanup actions that would place themselves or others at risk.

Recovery Clean-Up and Disposal

Certain procedures apply to responses required for any spill or release, including timely notifications and appropriate immediate actions by the initial observer to minimize potential adverse impacts. The primary goal of the initial response is to protect human health and safety, followed by protection of the environment.

Secondary goals of emergency response include identifying the material released, assessing hazards, containing the release, and coordinating treatment and/or disposal of recovered materials in accordance with applicable federal and state regulations.

The initial observer must not take undue risks with personal safety or endanger others while attempting to limit a release. Decisions regarding response actions beyond initial containment must be made by the PPT Leader or PPT Member after the material hazards have been identified and evaluated, including a review of the applicable Safety Data Sheet (SDS).

Clean-up of Spill Area

Surfaces contaminated by oil or chemical products must be cleaned using appropriate absorbents, neutralizing agents, or cleaning materials compatible with the spilled substance. All materials used during cleanup must be containerized and managed for proper disposal.

If porous materials (e.g., wood, concrete, soil) become contaminated, additional measures may be required to prevent migration to soil or groundwater. This may include removal, encapsulation, or off-site disposal. All tools and equipment used during spill response activities must be properly decontaminated or disposed of as waste, as appropriate.

Recovered Spill Material

All recovered spill material and cleanup debris must be placed into containers that are compatible with the type and quantity of material collected. Appropriate personal protective equipment (PPE) and cleanup methods shall be determined based on SDS guidance.

Care shall be taken to minimize waste generation. Incompatible materials shall not be mixed, as this may cause hazardous chemical reactions, limit disposal options, or increase disposal costs. Compatibility and segregation requirements shall be verified using SDS information.

Containers shall be secured and labeled to identify:

- Contents
- Date filled
- Facility name and street address

If the recovered material meets the definition of hazardous waste, containers must be labeled in accordance with Connecticut Hazardous Waste Regulations (22a-449(c)-100 through -119).

Disposal of Waste Materials

Waste generated during spill cleanup activities must be characterized in accordance with Connecticut Hazardous Waste Regulations (22a-449(c)-100 through -199). Used oil, discarded chemicals, and materials contaminated with oil or chemicals shall be managed as hazardous waste if they meet applicable regulatory definitions.

Representative sampling and analysis may be required to complete waste determinations. Regulated waste shall be transported by a licensed hazardous waste transporter in accordance with DOT requirements. Disposal activities shall be coordinated by the PPT Members.

General Spill Response Guidelines

The following general guidelines shall be followed when responding to an oil or chemical spill:

- Ensure appropriate personal protective measures are taken, including use of PPE identified in the SDS.
- Eliminate ignition sources when flammable materials are involved.
- Stop the source of the release where it can be done safely, including:
    - Shutting off valves
    - Discontinuing tank filling
    - Transferring material to intact containers
    - Isolating containers
    - Using compatible sealing materials

- Contain the release using appropriate methods, such as:
    - Absorbent pads, socks, or booms
    - Diking with earth-moving equipment (if appropriate)

    - Speedi-Dri® or equivalent absorbent
    - Pumps or vacuum systems

- Prevent materials from entering drains, conduits, or sewers leading to surface waters.
- Clean up spilled material and contaminated media in accordance with regulatory requirements.
- Chemical spills shall only be addressed using materials compatible with the substance released, as identified in the SDS.
- Engage a licensed spill response contractor or environmental consultant if the spill exceeds onsite response capabilities or presents chemical hazards beyond employee training.

In the event of an oil discharge to navigable waters or adjoining shorelines, the spill must be reported to the National Response Center (NRC) at 800-424-8802.

Duties of the PPT Members

In addition to the duties described previously, the PPT Member has the following responsibilities (see Section 3 for PPT Member contact information):

- Coordinate actions to prevent fires, explosions, or recurrence of releases.
- Stop affected operations as necessary and monitor equipment for leaks, pressure buildup, or failures.
- Arrange for proper treatment, storage, or disposal of:
    - Recovered waste
    - Contaminated soil
    - Contaminated surface waters
    - Disposable cleanup materials
- Ensure emergency equipment is cleaned, inspected, and returned to service following response activities.

Remediation and Corrective Action

The PPT Member is responsible for ensuring corrective measures are implemented to reduce the likelihood of recurrence. Corrective actions may include equipment upgrades, secondary containment installation, procedural changes, or enhanced training.

Incidents requiring ongoing remediation shall be managed by the PPT Member or designee.

APPENDIX F

Training Records

Course: Stormwater Pollution Prevention Plan (SWPPP) Training

Instructor: **Date:**

Print Name *(clearly)*	Signature	Job/Position

Training Agenda (as appropriate to the scope of the job duties of the personnel attending)

- An overview of the contents of the SWPPP.
- Spill response procedures, emergency equipment locations, good housekeeping practices, maintenance requirements, and material management practices.
- The location and maintenance of all controls on the site required by the GP.
- 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 Site's emergency procedures.

APPENDIX G

Monthly Inspection Form

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Monthly Inspection Form

Date, Time: _____
Weather Conditions*: _____
Inspector's Name(s). Note which Inspector(s) are Pollution Prevention Team Members:
_____
_____
Inspector's Signature(s):
_____

Check the following items that were inspected:

Potential Pollutant Sources
- □ Shipping & receiving loading docks
- □ Plant refuse and cardboard compactors
- □ Diesel tanks
- □ Overflow tanks
- □ Plastic resin silos
- □ Dumpsters
- □ Empty drums & totes
- □ Wood & metal pallets
- □ Storage trailers
- □ Scrap metal
- □ Salt/salt storage
- □ Electrical transformers
- □ HVAC units
- □ Roof exhaust vents
- □ Extruder grease traps

Stormwater discharge points
- □ Retention basin – Outfall 001
- □ Retention basin – Outfall 002

*At least one monthly inspection per calendar year must be performed while stormwater discharge is occurring.

Did you observe any of the following (check Yes or No)	**Yes**	**No**
Industrial materials, residue, or trash that may have or could come into contact with stormwater.		
Leaks or spills from industrial equipment, drums, tanks, and other containers.		
Offsite tracking of industrial or waste materials, or sediment, where vehicles enter or exit the site.		
Tracking/blowing of materials from areas of no exposure to exposed areas.		
Soil erosion; channel and streambank erosion and scour in the immediate vicinity of discharge points.		
Non-authorized non-stormwater discharges (e.g. vehicle wash-waters, boiler blowdown, sanitary wastes).		
Control measures needing replacement, maintenance, or repair.		

If you answered "Yes" to any of the above, provide comments below.

_____
_____
_____
_____

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Remedial Action Log

Instructions:
If any unsatisfactory condition(s) were observed during a monthly inspection, they shall be documented on this Remedial Action Log along with the corresponding remedial actions. This Log should be filed in Appendix G of the Stormwater Pollution Prevention Plan (SWPPP).

Date of Evaluation	Category	Description of Unsatisfactory Condition(s)	Remedial Action(s)		
			Description	Completion Date	Completed By

APPENDIX H

Semiannual Comprehensive Compliance Evaluation Form

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Semi-Annual Comprehensive Compliance Evaluation Form

Instructions: This Semi-Annual Comprehensive Compliance Evaluation Form must be completed by, or along with, a Pollution Prevention Team (PPT) Member. If remedial action(s) are required, the issue(s) must also be noted in the Remedial Action Log. This Form should be filed in Appendix H of the Stormwater Pollution Prevention Plan (SWPPP).

While completing this Form, please review, at minimum, the following items:

- SWPPP including, but not limited to, items such as best management practices (BMPs), control measures, spill response equipment, etc.;
- Site Map;
- Monthly Inspection Forms;
- Quarterly Visual Assessment Reports;
- Discharge Monitoring Reports (DMRs); and,
- Preventive Maintenance (PM) Records.

Name, Title, and Signature of Inspector: _____

Date, Time: _____

Weather Conditions: _____

Name, Title, and Signature of PPT Member: _____

Date of the Last Semi-Annual Comprehensive Compliance Evaluation: _____

Documentation Review		
Evaluation Criteria	**Responses, Observations, and/or Comments**	**Is Remedial Action Required? (Yes/No)**
Are the names and telephone numbers of the PPT Members listed in Section 3 of the SWPPP up-to-date and accurate?		
Have there been any changes to the outside of the facility since the last semi-annual evaluation that could affect stormwater? Review Table 4-2 of the SWPPP to verify that the potential pollutant sources listed are accurate compared to current conditions. • Have any new potential pollutant sources been added or removed? • If sources have been added, do the new sources add non-stormwater discharges to stormwater (e.g. vehicle wash-waters, boiler blowdown, sanitary wastes)? • Does the Site Plan need to be updated as a result of the aforementioned update(s)?		
Were there any spills or leaks since the last semi-annual evaluation that impacted stormwater? • If so, were the spills or leaks documented in Appendix D?		

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Semi-Annual Comprehensive Compliance Evaluation Form

Documentation Review		
Evaluation Criteria	**Responses, Observations, and/or Comments**	**Is Remedial Action Required? (Yes/No)**
Have the PM activities outlined in the SWPPP (i.e., catch basin cleaning, equipment maintenance, sweeping, etc.) been performed at the specified frequencies? • Were maintenance records retained in the location specified in the SWPPP?		
Review the Monthly Inspection Forms that were completed since the date of the last Semi-Annual Comprehensive Compliance Evaluation. • Are the completed Monthly Inspection Forms filed in Appendix G of the SWPPP? • Were any unsatisfactory conditions corrected and was documentation retained to demonstrate this?		
Were Quarterly Visual Assessment Forms completed during each quarter since the date of the last Semi-Annual Comprehensive Compliance Evaluation? • Are the completed Quarterly Visual Assessment Forms filed in Appendix K of the SWPPP? • Were any unsatisfactory conditions corrected and was documentation retained to demonstrate this?		
Were semiannual stormwater samples collected during the last monitoring period? • If so, were monitoring results submitted to the Connecticut Department of Energy and Environmental Protection (CT DEEP) within 90 days of sampling? • Were there any benchmark exceedances? • If so, were corrective actions taken and was documentation retained to demonstrate this?		
Are there any issues that were identified in the previous Semi-Annual Comprehensive Compliance Evaluation that have not been addressed?		
Review stormwater training records. • Has annual training been performed? ○ If yes, document the date(s). • Have newly hired employees been provided with stormwater training within 90 days of beginning a position that involves activities that could potentially affect stormwater?		

AMGRAPH PACKAGING, INC.
Baltic, Connecticut

Semi-Annual Comprehensive Compliance Evaluation Form

Site Inspection		
Evaluation Criteria	**Responses, Observations, and Comments**	**Is Remedial Action Required? (Yes/No)**
Interior Facility Walk-Through: Inspect interior material and chemical storage areas including raw, intermediate, final, and waste materials that have the potential to be released outside of the confines of the facility and come in contact with stormwater.		
Roof Inspection: Inspect the roof for signs of contamination, discoloration, etc. as well as sediment build-up in gutters, roof drains, downspouts, etc.		
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 properly.		
Inspect all outfalls. Describe any discharges occurring at the time of the inspection.		

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Semi-Annual Comprehensive Compliance Evaluation Form

Remedial Action Log

Instructions:
After completion of the Semi-Annual Comprehensive Compliance Evaluation Form, if any unsatisfactory condition(s) were observed, they shall be documented on this Remedial Action Log along with the corresponding remedial actions. This Log should be filed in Appendix H of the Stormwater Pollution Prevention Plan (SWPPP).

Date of Evaluation	Category	Description of Unsatisfactory Condition(s)	Remedial Action(s)		
			Description	Completion Date	Completed By

APPENDIX I

Summary of Monitoring During Previous Permit Term

Summary of Monitoring During Previous Permit Term

Benchmark monitoring data from 2021 to 2025 was available to summarize. Based on the sampling data presented in the tables below, Amgraph met all benchmarks prior to 2024.

Outfall 001 Sampling Results														
Sample Date / Parameter	Semiannual periods										Avg.	Bench-mark	Units
	1	2	3	4	5	6	7	8	9	10			
	Skipped	8/23/2021	Skipped	8/23/2022	6/14/2023	10/30/2023	5/15/2024	Skipped	2/6/2025	8/29/2025			
COD		30.6		68.1	34.5	10.9	33		53.1	30.6	31.9	75	mg/L
TP		0.0244		0.0669	0.0563	0.0223	0.115		0.115	0.0436	0.1	0.40	mg/L
TKN		0.475		1.55	0.869	0.434	0.622		1.07	0.49	0.7	2.30	mg/L
Total Zn		0.1		0.143	0.157	0.0717	0.0898		0.16	0.143	0.1	0.160	mg/L

Outfall 002 Sampling Results													
Sample Date / Parameter	Semiannual periods										Avg.	Bench-mark	Units
	1	2	3	4	5	6	7	8	9	10			
	Skipped	8/23/2021	Skipped	8/23/2022	6/14/2023	10/30/2023	5/15/2024	Skipped	2/6/2025	8/29/2025			
COD		23.4		49.9	39	26	68.5		95.5	43.2	58.3	75	mg/L
TP		0.0276		0.0871	0.0648	0.0499	0.106		0.148	0.0701	0.1	0.40	mg/L
TKN		0.539		1.2	0.95	0.492	1.07		1.08	0.758	0.9	2.30	mg/L
Total Zn		0.0706		0.109	0.128	0.0982	0.277		0.134	0.0847	0.1	0.160	mg/L

APPENDIX J

Deviations from Monitoring Schedule

Date / Time	Monitoring Type (Visual / Semiannual)	Location / Outfall	Inspector / Sampler	Description and Cause(s) of Deviation	Potential Impact to Stormwater or Permit Compliance (Yes/No, Include Explanation)	Immediate Corrective Action(s) Taken [Include Completion Date]	Preventive Measure(s) Implemented [Yes / No]	Follow-Up Verification [Date and Name of Verifier]

APPENDIX K

Quarterly Visual Assessment Form

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Sampling Period: Quarter , Sampling Year

Quarterly Visual Assessment Form

Instructions:

- A visual sample can only be collected during a storm event that occurs at least 72 hours after any previous storm events generating a discharge at the sampling location.
- A sample must be collected within the first 30 minutes of discharge at the sampling location. If it was not, please indicate why: _____
- The visual assessment must be made in a clean, colorless plastic or glass container and conducted in a well-lit area.
- If unsatisfactory water quality characteristics are observed, the cause(s) of contamination must be investigated and corrected. This information should be documented on the Remedial Action Log.

Sampling Date: _____ Stormwater Source (Rain/Snowmelt): _____

Discharge Start Time (am/pm): _____ Sampling Time (am/pm): _____

Sampling Location: _____

Sampler's Name, Title, Signature: _____

Water Quality Characteristics	**Observations**	**Satisfactory** (No further action required)	**Unsatisfactory** (Remedial action needed)
Color			
Odor			
Clarity			
Floating Solids			
Settled Solids			
Suspended Solids			
Foam			
Oil Sheen			
Other Obvious Indicators of Stormwater Pollution			

AMGRAPH PACKAGING, INC.
Baltic, Connecticut
Sampling Period: Quarter , Sampling Year

Remedial Action Log

Instructions:

If unsatisfactory water quality characteristics are observed, the probable sources of stormwater contamination must be noted below along with documentation of the completed remedial actions. This Log should be filed in Appendix K of the Stormwater Pollution Prevention Plan (SWPPP).

Sampling Date	Unsatisfactory Water Quality Characteristics Observed	Probable Sources of Stormwater Contamination	Completed Remedial Actions		
			Description	Completion Date	Completed By

APPENDIX L

Annual Report Template

APPENDIX M

Semiannual Monitoring Records

APPENDIX N

Corrective Action Measure 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

Appendix G
Corrective Action Measure Requirements & Waiver Request

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	

Appendix G
Corrective Action Measure Requirements & Waiver Request

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	☐

Appendix G
Corrective Action Measure Requirements & Waiver Request

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

Appendix G
Corrective Action Measure Requirements & Waiver Request

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)	

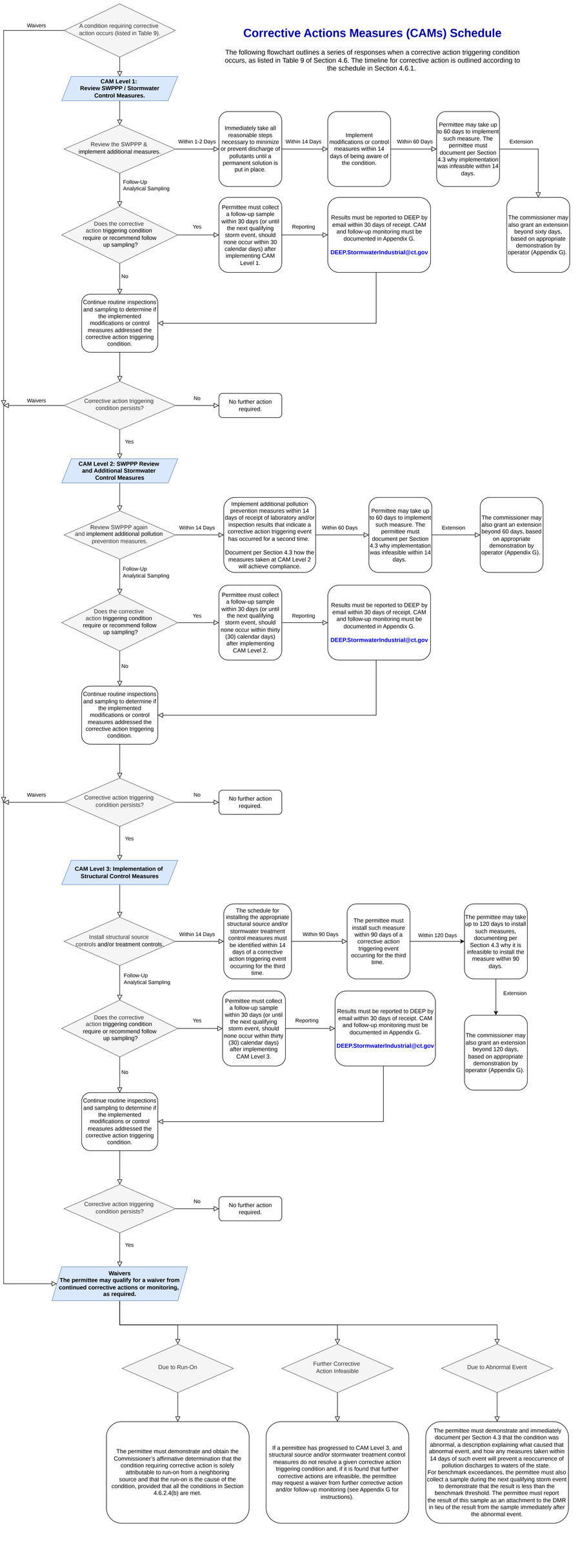
Appendix G
Corrective Action Measure Requirements & Waiver Request

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.

Corrective Actions Measures (CAMs) Schedule

The following flowchart outlines a series of responses when a corrective action triggering condition occurs, as listed in Table 9 of Section 4.6. The timeline for corrective action is outlined according to the schedule in Section 4.6.1.



APPENDIX O

SWPPP Revision Log

SWPPP Revision Log

Amendment Number	Description of the Amendment	Recertification Required?* (Yes/No)	Date of Amendment	Amendment Prepared by [Name(s) and Title(s)]	Signature(s)
0	Complete reissuance of the SWPPP in accordance with the GP issued on November 1, 2025.	Yes	March 2026	Montserrat Sanchez-Guzman, Senior Engineer, LEA	
1					
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* If significant changes are made to the site or to the SWPPP in accordance with Section 4.3 of the GP, the SWPPP must be re-certified in accordance with Section 4.3.2.9 of the GP.