

STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

Mill Rock Packaging Partners LLC South Windsor, Connecticut February 2026

Prepared for
Mill Rock Packaging Partners LLC
31 Edwin Road
South Windsor, Connecticut 06074



Loureiro Engineering Associates, Inc.

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An Employee-Owned Company

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Comm. No. 048SW4.01

STORMWATER POLLUTION PREVENTION PLAN

**MILL ROCK PACKAGING PARTNERS LLC
SOUTH WINDSOR, CONNECTICUT**

FEBRUARY 2026

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South Windsor, Connecticut 06074**

Prepared by

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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
PE	Professional Engineer
PM	Preventive Maintenance
PPE	Personal Protective Equipment
PPT	Pollution Prevention Team
SDS	Safety Data Sheet
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
UV	Ultraviolet
Zn	Total Zinc

Site Contact Information

Facility Operator(s):
Name: Kayla Kudla
Address: 31 Edwin Road
City, State, Zip Code: South Windsor, CT, 06074
Telephone Number: 860-803-6052
Email address: kayla.kudla@millrockpkg.com

Facility Owners(s) if different than operator:
Name: Jim Rutt
Address: 31 Edwin Road
City, State, Zip Code: South Windsor, CT, 06074
Telephone Number: 860-930-9204
Email address: james.rutt31@gmail.com

SWPPP Contact(s):
SWPPP Contact Name (Primary): Kayla Kudla
Telephone Number: 860-803-6052
Email address: kayla.kudla@millrockpkg.com
SWPPP Contact Name (Backup): Jonathan Landry
Telephone Number: 860-328-3342
Email address: jonathan.landry@millrockpkg.com

1. INTRODUCTION

Loureiro Engineering Associates, Inc. (Loureiro) was retained by Mill Rock Packaging Partners LLC (hereafter referred to as Mill Rock) to prepare a Stormwater Pollution Prevention Plan (SWPPP) (hereafter referred to as the “Plan”) for its Site located at 31 Edwin Road in South Windsor, Connecticut (hereafter referred to as the “Site”). This Plan has been prepared to provide Mill Rock 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 Mill Rock 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 amendment are identified in Section 8 of this Plan.

1.1 Description of the Site

Mill Rock operates under the Standard Industrial Classification (SIC) Code 2657 (Folding Paperboard Boxes, Including Sanitary), and North American Industry Classification System (NAICS) Code 322212 (Folding Paperboard Box Manufacturing). The Site is approximately 10 acres in size and consists of a 50,000 square foot building, paved parking and driveway areas, and a wooded area. Mill Rock’s manufacturing operations include printing and coating using

ultraviolet (UV) and aqueous inks, as well as coatings' sheeting and die cutting; and converting and finishing including gluing and taping. The primary raw materials used at the facility include paperboard, printing inks, coatings, additives, and glues.

Abutting properties include U.S. Route 5 on the east, Edwin Road with industrial and commercial properties to the north, commercial properties to the south, and industrial and commercial properties to the west. The site is in an area of State and Federal Listed Endangered, Threatened, and Special Concern Species. Stormwater from Mill Rock discharges to Stoughton Brook, which is classified as Class A according to the most recent (October 2018) Water Quality Classification Map of South Windsor created by CT DEEP. Class A inland surface water is uniformly good to excellent, natural quality. All fresh waterbodies in the State of Connecticut are designated as impaired for mercury.

The Site is located at 41.8237° N and 72.6212° 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:

Mill Rock Packaging Partners LLC

Certifier Name: Kayla Kudla

Certifier Title: Director of Operations

Certifier's Signature:



Date: 03/25/2026

Site/Facility Name: Mill Rock Packaging Partners LLC

Site/Facility Address: 31 Edwin Road, South Windsor, CT 06074

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 Mill Rock Packaging Partners LLC. 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.

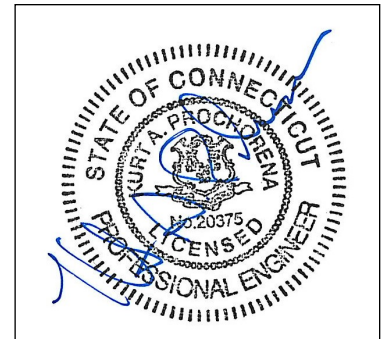
Certifier Name: Kurt A. Prochorena, PE

Certifier Title: Vice President/Principal Engineer

Certifier's Signature:



Seal / Stamp:



Date: 3/23/26

Site/Facility Name: Mill Rock Packaging Partners LLC

Site/Facility Address: 31 Edwin Road, South Windsor, CT 06074

General Permit No.: CTR050000

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 Mill Rock Packaging Partners LLC 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: Kurt. A. Prochorena, PE

Certifier Title: Vice President/Principal Engineer

Certifier Signature:

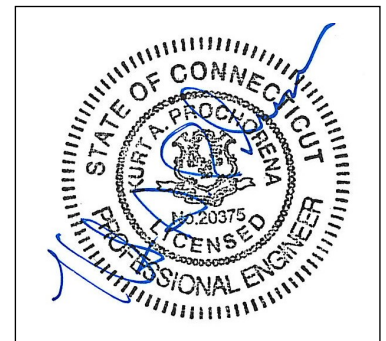
Seal/Stamp:

Date: 3/23/26

Site/Facility Name
and Address:

Mill Rock Packaging Partners LLC
31 Edwin Road, South Windsor, CT 06074

General Permit No.: CTR050000



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	Kayla Kudla, Director of Operations	860-291-0027 x159 (office) 860-803-6052 (cell)	<ul style="list-style-type: none"> ▪ 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.

PPT Member	Jonathan Landry, Quality Assurance Manager	860-328-3342 (cell)	<ul style="list-style-type: none"> ▪ 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.
PPT Member	Paul Tasillo, Maintenance Technician	860-680-8631 (cell)	<ul style="list-style-type: none"> ▪ Ensure routine inspections are performed or perform inspections. ▪ Ensure preventative maintenance program is implemented. ▪ Oversee housekeeping practices. ▪ Coordinate spill response activities.

4. POTENTIAL POLLUTANT SOURCES

4.1 Summary of Drainage Areas

The Site has five 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
Curb cut on southern edge of the Site's paved area	001 Roof Section E, West & South Paved Areas	0.91
Catch basin along Edwin Road	002 Roof Sections A, B, C, & D	0.95
Catch basin along Edwin Road	003 Roof Section F	0.95
Grassy area on north side of the Site	004 Front Parking Lot & Grass Area	0.38
Wooded area that encompasses the southern half of the Site	005 Wooded Area	0.05

4.1.1 Drainage Area 001

Drainage Area 001 includes the roof of building section E and the paved driveway and parking areas along the southern and western portions of the Site, as depicted on Drawing 1. Operations meeting the definition of Industrial Activity are performed by Mill Rock within this drainage area.

Potential pollutant sources located within Drainage Area 001 include:

- Leakage of oil and grease (O&G) from roof-top heating, ventilating and air conditioning (HVAC) units.
- Contaminants from exhaust vents from the printing press located in section E of the building.
- Contaminants from material transfer activities and truck traffic associated with the shipping and receiving loading docks.
- Leakage of hydraulic oil from the compactors and their associated hydraulic reservoirs.
- Contaminants from the scrap paper cyclone located on the eastern side of the building.
- Contaminants from the two adjacent cyclones located on the southern corner of the building.

- Contaminants from the wood pallet dumpster located southeast of the building.
- Leakage of oil from a pad-mounted electrical transformer located on the southern corner of the building.
- Leakage of glycol from a chiller located on the southern side of the building.
- Minor leakage of O&G from vehicular traffic on the paved areas.

Control measures in Drainage Area 001 include preventive maintenance (PM) and routine inspections. The stormwater collection system in this area consists of two roof drains from section E of the building. The roof drains discharge through interior drainage leaders and in-slab stormwater piping onto the paved area along the south side of the Site building. Stormwater runoff from the paved areas in Drainage Area 001 sheet flows to the southern edge of the paved area where the stormwater discharges through a curb cut into a drainage channel leading into Stoughton Brook. The point source discharge at the curb cut has been designated as SWD-001. There is seasonal sweeping of paved areas to reduce the 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 $R = 0.05 + 0.009 * \frac{82455}{82455+3787} * 100\% = 0.91$

4.1.2 Drainage Area 002

Drainage Area 002 includes the roofs of building sections A, B, C, and D, as depicted on Drawing 1. Operations meeting the definition of Industrial Activity are performed by Mill Rock within this drainage area.

Potential pollutant sources located within Drainage Area 002 include:

- Leakage of O&G from roof-top HVAC units.
- Contaminants from exhaust vents from natural gas heating units.

Control measures in Drainage Area 002 include PM activities and routine inspections. The stormwater collection system in this area consists of a total of nine roof drains from building sections A, B, C, and D. The roof drains discharge through interior drainage leaders and

underground stormwater piping into a catch basin located along Edwin Road via SWD-002 which is a 4-inch Polyvinyl chloride (PVC) pipe. The catch basin is part of the South Windsor municipal storm sewer system.

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 $R = 0.05 + 0.009 * \frac{23368}{23368} * 100\% = 0.95$

4.1.3 Drainage Area 003

Drainage Area 003 includes the roof of building section F, as depicted on Drawing 1. Operations meeting the definition of Industrial Activity are performed by Mill Rock within this drainage area.

Potential pollutant sources located within Drainage Area 003 include:

- Contaminants from an exhaust vent from a natural gas heating unit.
- Contaminants from the cardboard trim collection system.

Control measures in Drainage Area 003 include preventative maintenance and routine inspections. The stormwater collection system in this area consists of four roof drains from building section F. The roof drains discharge through interior drainage leaders and underground stormwater piping into a catch basin located along Edwin Road via SWD-003 which is an 8-inch PVC pipe. The catch basin is part of the South Windsor municipal storm sewer system.

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 $R = 0.05 + 0.009 * \frac{12483}{12483} * 100\% = 0.95$

4.1.4 Drainage Area 004

Drainage Area 004 includes the grassy area located between the north side of the Site Building and Edwin Road and the paved parking area located on northeast corner of the Site building. No industrial activities are performed by Mill Rock within Drainage Area 004.

Potential pollutant sources located within Drainage Area 004 include:

- Minor leakage of O&G from vehicular traffic on the paved areas.

Stormwater runoff from the grassy areas either infiltrates into the ground or sheet flows onto Edwin Road. Stormwater runoff from the paved parking area sheet flows onto Edwin Road. Upon reaching Edwin Road, the stormwater enters the South Windsor municipal storm sewer system via catch basins. There are no catch basins in the paved parking area.

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 $R = 0.05 + 0.009 * \frac{5081}{5081+8666} * 100\% = 0.38$

4.1.5 Drainage Area 005

Drainage Area 005 includes the wooded area that wraps around the west and south sides of the Site. No industrial activities are performed by Mill Rock within Drainage Area 005. Stoughton Brook flows east to west through Drainage Area 005. A drainage channel within Drainage Area 005 receives stormwater runoff from the paved areas of the Site and discharges to Stoughton Brook.

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 $R = 0.05 + 0.009 * \frac{0}{293955} * 100\% = 0.05$

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.

Mill Rock 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 roof areas and vents, material handling areas, and outdoor storage areas, and equipment.

Mill Rock will notify CT DEEP no fewer than 30 days prior to making any planned physical alterations or additions to the Site that would 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 Outdoor Material Storage and Equipment

Outdoor storage and activities at the Site include five enclosed trash compactors, three cyclone units, one storage trailer, one pad-mounted transformer, and one glycol chiller.

One enclosed trash compactor for general plant refuse with an external hydraulic reservoir is located on the southwest corner of the Site building. Two enclosed trash compactors for cardboard trimmings with external hydraulic reservoirs are located on the southern corner of the Site building. One spare enclosed trash compactors and a wood pallet dumpster are located on the paved area southeast of the Site Building. Section 4.2.2.3 of the GP requires dumpsters, trash compactors, and roll-off containers to be in sound watertight condition and have covers and drain plugs intact. The compactors and wood pallet dumpster are inspected monthly for signs of leakage that could cause stormwater contamination and to confirm the dumpster's drain plugs are intact. The cardboard compactors are each connected to cyclone units that are part of a trim collection system. To minimize the potential for stormwater contamination from the trim collection system, Mill Rock should follow good housekeeping practices such as regularly picking up and disposing of scrap cardboard.

One enclosed storage container with scrap cardboard is located on the southeast corner of the Site Building. Since the materials are stored within the closed storage containers, there is minimal potential for stormwater exposure and contamination from these storage activities.

One utility-owned transformer is located on the southeast corner of the Site building. Due to the design of the transformer, the potential for stormwater pollution is relatively insignificant. The minor seepage of transformer oil would be quickly detected during monthly inspections conducted by Mill Rock. If a transformer oil release is observed by Mill Rock personnel during the course of routine operations, Mill Rock personnel shall immediately notify the utility company to mitigate the release.

One glycol chiller is located on the southern side of the building. Due to the design of the chiller, the potential for stormwater pollution is relatively insignificant. The chiller is surrounded by anti-collision guardrail posts to protect it against vehicle traffic. Any minor leak of antifreeze would be quickly detected during site walkthroughs and monthly inspections conducted by Mill Rock.

4.3.2 Material Handling

The facility has two loading dock areas with a total of six overhead doors on the south and west sides of the Site building. The loading docks are used for the receiving of bulk shipments of raw materials and chemicals including inks, coatings, and solvents in containers up to 330 gallons in size and the shipping of finished paper packaging, used oil, and non-hazardous waste. Small quantities of used oil and non-hazardous waste are generally shipped off-site on a monthly basis. A truck trailer for the storage of scrap cardboard is located at the easternmost loading dock overhead door.

Unless materials are spilled outside of the facility, it is not anticipated that the loading and unloading activities themselves will impact the stormwater discharges in terms of direct stormwater contact with finished products, raw materials and wastes. If a spill was to occur during loading and unloading activities, Mill Rock would attempt to contain the spilled material using available spill control equipment and appropriately trained Mill Rock personnel and would contact an outside contractor to clean up the spill. Since pollutants in stormwater can result from leaks and drips of oil and fuels from vehicular and forklift traffic, it is expected that the shipping and delivery vehicles may contribute to pollutants in the stormwater discharges.

4.3.3 Roof Areas

The roofs on the Site building have a total of 10 HVAC units which contain lubricants and/or refrigerants that may leak on the roof surface impacting stormwater quality. To minimize their potential impact, the HVAC units are inspected monthly by Mill Rock personnel and serviced semiannually by an outside contractor. Uncontaminated condensate from units, an allowable non-stormwater discharge, is discharged onto the roof surface. Exhaust vents from interior natural gas heating units are located on the roofs of building sections C and D. These exhaust vents are not a significant source of stormwater pollution because of the fuel burning capacity of the heating units.

Candy cane exhaust vents from printing presses are located on the roof of building section E. The vents exhaust volatile organic compounds and heat emitted from the curing of inks and coating. Since the potential for surface deposition is low with volatile organic compounds, the exhaust vents are not a significant source of stormwater pollution.

Ducting and enclosed blowers for a cardboard trim collection system are located on the roof of building section F. Since the ducting and blowers are enclosed, the equipment is not a significant source of stormwater pollution.

4.3.4 De-icing Material Storage

Mill Rock does not have any permanent storage piles of de-icing materials. There is temporary storage of salt during the winter in a closed 5-gallon pail or plastic bag located by the front door. This salt is used to melt icy surfaces on the walkway leading to the front entrance.

4.4 **Spills and Leaks**

Under the GP, Section 4.3.2.4(b), Mill Rock 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 Mill Rock 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 Mill Rock.

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 to reduce buildup of sediment, debris, and other contaminants.
- 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.
- Conduct site walkthroughs on a monthly basis, or more frequently as needed, to identify any signs of stormwater pollution.
- Clean roof drains at regular intervals to prevent sediment build-up, based on conditions observed during monthly and/or semiannual inspections.

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 Technician is responsible for PM activities at the Site. PM activities performed by Mill Rock include:

- Monthly visual inspections of areas covered by the requirements in the GP.
- Semiannual preventative maintenance of the HVAC units and heating systems at the facility, performed by an outside contractor for Mill Rock.
- 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 the Maintenance Technician or designated facility personnel.

All PM records for the site are maintained by the Jonathan Landry and Paul Tasillo. 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

Mill Rock should 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, Mill Rock should follow the Spill Response Procedures provided in Appendix E of this Plan. Mill Rock 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, Mill Rock will contact a spill contractor 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, Mill Rock 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. No 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 that collect runoff before being discharged offsite through stormwater outfalls.

Stormwater management practices that are considered appropriate to Mill Rock are as follows:

- Roof drains have been installed to direct stormwater through the storm drainage system to outfalls away from industrial activities. They should be inspected and properly maintained.

- The roof areas should be observed at least monthly to ensure that the roof drains are clear of debris and to identify any signs of leaks or material deposition from the HVAC units and process vents.
- All access roads, parking areas, and truck routes that have been paved to reduce erosion should be periodically swept and properly maintained. All unpaved areas should be regularly monitored to ensure limited erosion.

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 2024 Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Stormwater Quality Manual for the design and implementation of post-construction stormwater management measures. In addition, Mill Rock 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**

Mill Rock 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 will be conducted by the Maintenance Technician. Semiannual inspections will be conducted by Loureiro and a member of the PPT.

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, Mill Rock 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,

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, Mill Rock 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;
- 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;
- 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 Mill Rock to perform stormwater outfall monitoring. Mill Rock operates under SIC Code 2657, and therefore is subject to the monitoring requirements for Sector B (Paper Allied Products Manufacturing) under Section 8.2 of the GP. The monitoring requirements are detailed in the following subsections. Stormwater monitoring will be conducted by Loureiro and a member of the PPT.

A summary of the stormwater discharge sampling data that was collected by Mill Rock 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

Sampling locations at the Site are as follows:

- SWD-001: Stormwater is to be collected from the sheet flow on the curb cut at the southern edge of the paved area.
- SWD-002: Stormwater is to be collected from below the grate within the catch basin (Drainage Area 002)
- SWD-003: Stormwater is to be collected from below the grate within the catch basin (Drainage Area 003)

As described in Section 4.1 of this Plan, the Site has a total of three (3) point source discharges of stormwater. SWD-001 from Drainage Area 001 is a curb cut at the southern edge of the pavement as it discharges into a drainage channel. SWD-002 and SWD-003 from Drainage Areas 002 and 003 are at the end of PVC pipes as they discharge into catch basins located along Edwin Road.

The site does not discharge within 500 feet of a tidal wetland. The stormwater from the site discharges to Stoughton Brook and the South Windsor municipal storm sewer system. Stoughton Brook does not have a Total Maximum Daily Load (TMDL) and is classified as Class A according to the most recent (October 2018) Water Quality Classification Map of South Windsor created by CT DEEP. Class A inland surface water is uniformly good to excellent, natural quality.

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, Mill Rock 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, Mill Rock 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 Mill Rock 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, Mill Rock must perform benchmark stormwater monitoring for the parameters listed in Table 7-1, Summary of Sector B 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 Mill Rock, 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 Mill Rock 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 Mill Rock's Semiannual Benchmark Monitoring must comply with the benchmarks for the parameters specified in Table 7-1. Mill Rock 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 Mill Rock 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, Mill Rock 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 Mill Rock 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, Mill Rock 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 Mill Rock determines that exceedance of the benchmark is attributable solely to the presence of that pollutant in “run-on” entering from off-site, Mill Rock 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).
- Mill Rock 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.
- Mill Rock demonstrates that the diversion of off-site run-on containing these pollutant levels is infeasible through engineering analysis.
- Mill Rock 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, Mill Rock 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

Mill Rock will submit DMRs until via email to DEEP.StormwaterIndustrial@ct.gov until the Notice of Coverage is received by 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 K, Quarterly Visual Assessment Form and Appendix M, Semiannual Monitoring Records) 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, Mill Rock 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, Mill Rock 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, Mill Rock 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, Mill Rock must document the reason why. They must also identify a schedule for completing the work, which must be done as soon as practicable and 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, Mill Rock 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, Mill Rock 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, Mill Rock 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

Mill Rock 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, Mill Rock 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.

Mill Rock must select controls with pollutant removal efficiencies that are sufficient to prevent or minimize pollution of stormwater. Mill Rock 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, Mill Rock 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 Mill Rock 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.
- Mill Rock 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.
- Mill Rock 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 Mill Rock 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. Mill Rock 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, Mill Rock 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 Mill Rock 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), Mill Rock 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	Roof section E	HVAC units	O&G, TSS	Rooftop unit	<ul style="list-style-type: none"> • Monthly inspections • Preventative maintenance 	NA	SWD-001
		Press exhaust vents	VOCs	Rooftop vents	<ul style="list-style-type: none"> • Monthly inspections 	NA	
	Shipping/Receiving docks	Receipt of raw materials/chemicals and shipping of finished packaged goods, waste, and used oil.	O&G, TSS, VOCs	Materials are only exposed to precipitation during loading/unloading activities.	<ul style="list-style-type: none"> • 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.	
	Paved driveway and parking areas	Plant refuse and cardboard compactors	O&G, TSS	Enclosed compactor	<ul style="list-style-type: none"> • Monthly inspections • Good housekeeping practices 	Waste shipped out when full.	
		Cardboard trim collection system	TSS	Rooftop unit	<ul style="list-style-type: none"> • Monthly inspections • Good housekeeping practices 	NA	
		Storage trailers and wood pallet dumpster	TSS	Enclosed trailers. Dumpster contents are exposed to precipitation only during loading/unloading.	<ul style="list-style-type: none"> • Monthly inspections • Good housekeeping practices 	NA	

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	Paved driveway and parking areas	Electrical transformer and glycol chiller	O&G	Transformer	<ul style="list-style-type: none"> Monthly inspections 	NA	SWD-001
		Sand/Salt in the winter. Vehicle traffic	O&G, TSS	Sand/salt is stored in a closed 5-gal pail or plastic bag.	<ul style="list-style-type: none"> Monthly inspections Good housekeeping practices 	NA	
002	Roof sections A, B, C, and D	HVAC units	O&G, TSS	Rooftop unit	<ul style="list-style-type: none"> Monthly inspections Preventative maintenance 	NA	SWD-002
		Heater exhaust vents	TSS	Rooftop vent	<ul style="list-style-type: none"> Monthly inspections 	NA	
003	Roof section F	Cardboard trim collection system	TSS	Rooftop unit	<ul style="list-style-type: none"> Monthly inspections Good housekeeping practices 	NA	SWD-003
004	Front paved parking area	Vehicle traffic	O&G	Parking area	<ul style="list-style-type: none"> Monthly inspections Good housekeeping practices 	NA	SWD-003
005	No industrial activities/pollutant sources.						

TABLE 7-1 SUMMARY OF SECTOR B MONITORING REQUIREMENTS

All Monitoring Requirements for Sector B (Paper Allied Products Manufacturing)				
MONITORING TYPE	INDUSTRIAL ACTIVITY	SCHEDULE	PARAMETER	THRESHOLD OR LIMIT
BENCHMARK GP Section 4.5.1	Applies to all Sector B 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 B facilities	No additional monitoring for Sector B		
EFFLUENT LIMITS GP, Section 4.5.3	Applies to all Sector B facilities	No effluent limits for Sector B		
AQUATIC TOXICITY GP, Section 4.5.4	Applies to all Sector B facilities	Once in the permit term ³	LC ₅₀ for <i>Daphnia pulex</i>	None
			LC ₅₀ for <i>Mysidopsis bahia</i>	
IMPAIRED WATERS GP, Section 4.5.5	Applies to all Sector B 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).

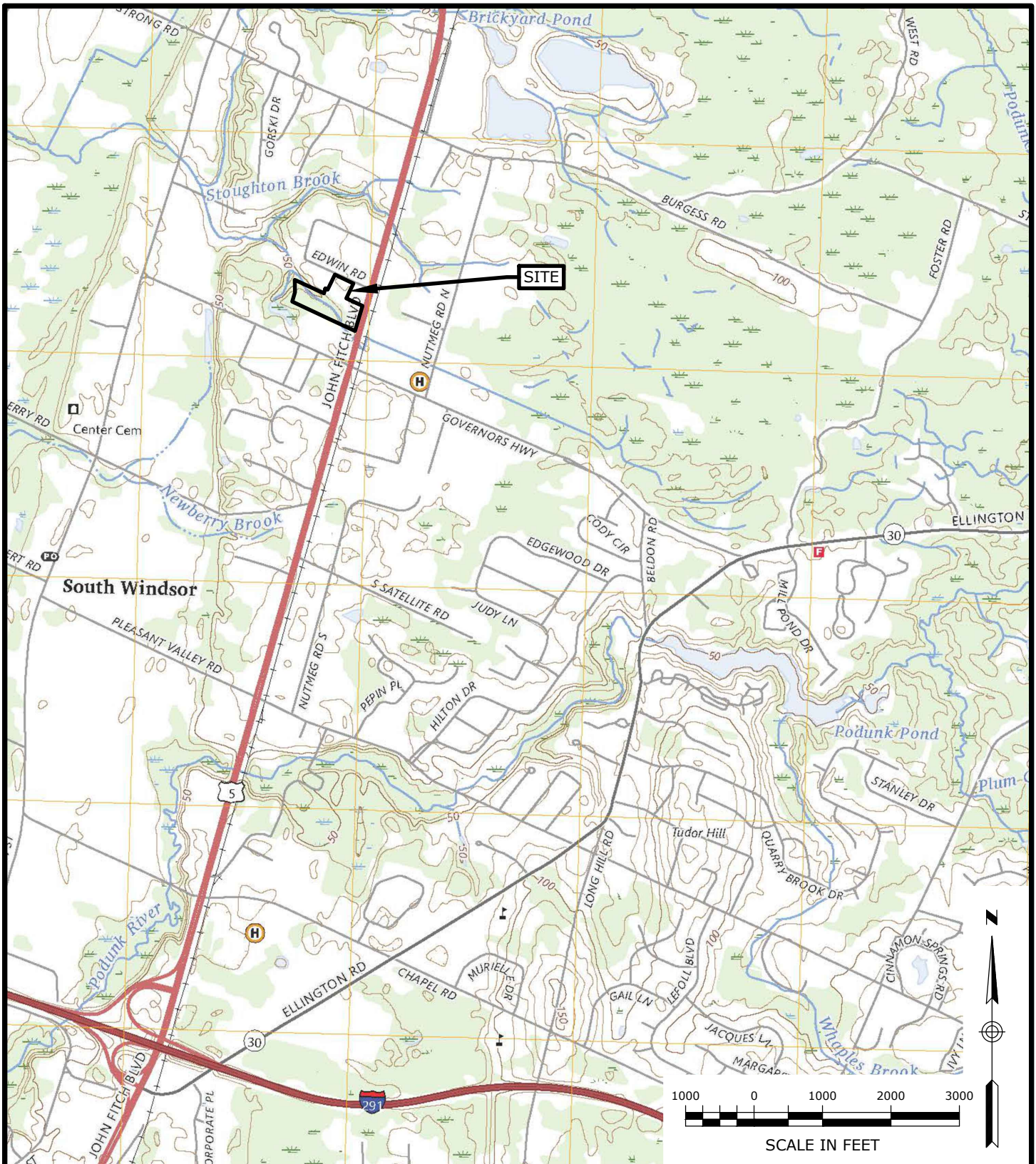
² DEEP Water Quality Plans and Assessment Map: <https://portal.ct.gov/DEEP/Water/Water-Quality/Water-Quality-305b-Report-to-Congress>.

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

V:\CT\South Windsor\EDWIN RD-31\STORMWATER\SWPPP UPDATE_048SW4.01\DWGS\FIG 1-USGS.DWG Tab: USGS
 Saved: 3/13/2026 8:09 AM by ESFARMER Paper Size: 8.5" x 11" Plotted: 3/13/2026 8:34 AM



Loureiro Engineering Associates, Inc.
 100 Northwest Drive • Plainville, Connecticut 06062
 Phone: 860-747-6181 • Fax: 860-747-8822
 An Employee Owned Company • www.Loureiro.com

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SITE LOCATION MAP

STORMWATER POLLUTION PREVENTION PLAN

31 EDWIN ROAD, SOUTH WINDSOR, CT 06074

PREPARED FOR:

MILLROCK PACKAGING PARTNERS LLC

31 EDWIN ROAD, SOUTH WINDSOR, CT 06074

SCALE

1"=2,000'

COMM. NO.

048SW1.02

DATE

03/10/2026

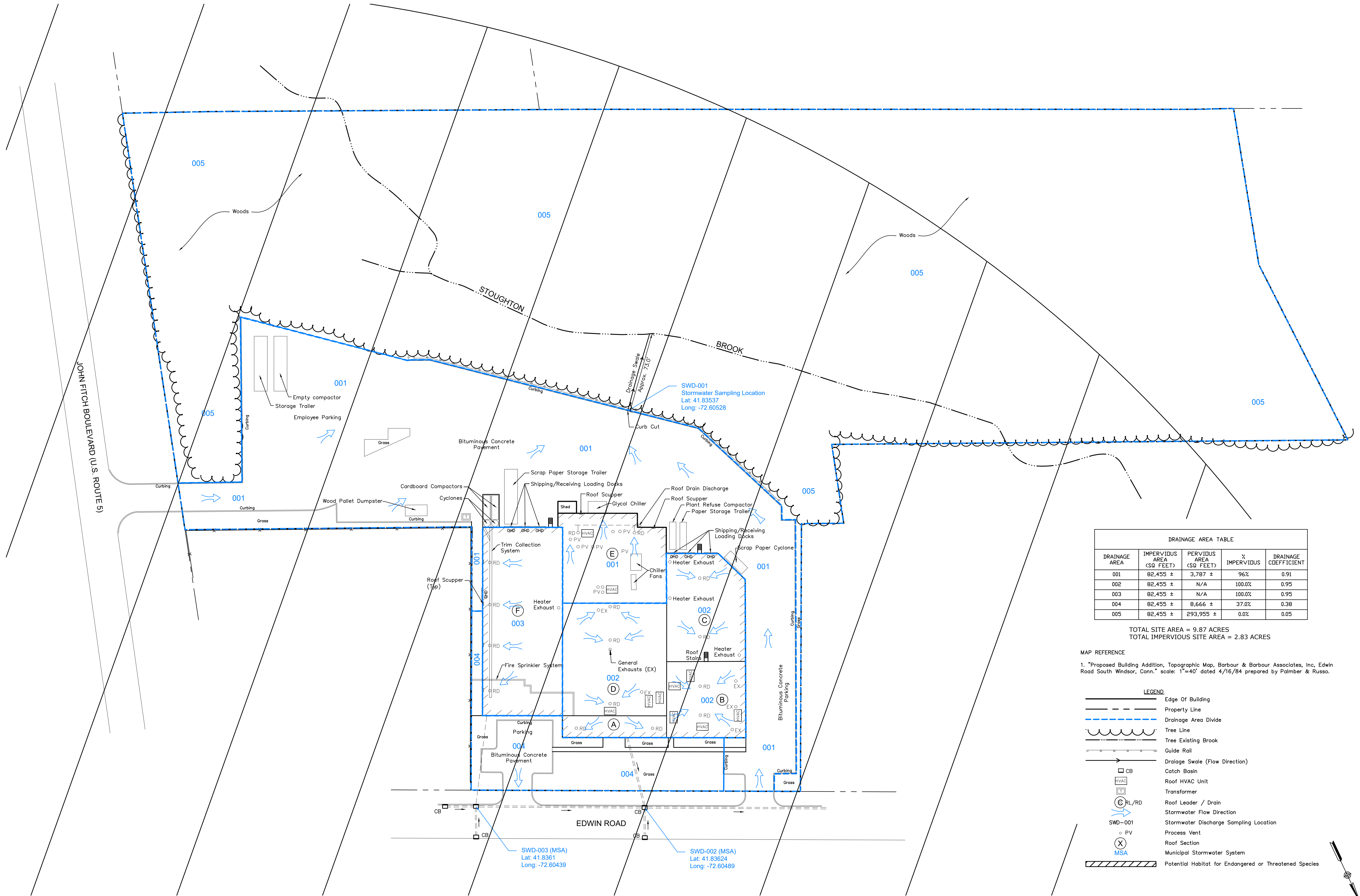
DRAWING

FIGURE 1

DRAWING 1

Site Plan

V:\CT\SOUTH WINDSOR\EDWIN RD-11\STORMWATER\SWPPP\UPDATE_2024\DWG\11 SITE PLAN SWPPP_UPDATE_2024.DWG: This SITE PLAN SWPPP_UPDATE_2024.DWG was printed: 3/11/2026 10:53 AM



DRAINAGE AREA TABLE				
DRAINAGE AREA	IMPERVIOUS AREA (SQ FEET)	PERVIOUS AREA (SQ FEET)	% IMPERVIOUS	DRAINAGE COEFFICIENT
001	82,455 ±	3,787 ±	96%	0.91
002	82,455 ±	N/A	100.0%	0.95
003	82,455 ±	N/A	100.0%	0.95
004	82,455 ±	8,666 ±	37.0%	0.38
005	82,455 ±	293,955 ±	0.0%	0.05

TOTAL SITE AREA = 9.87 ACRES
 TOTAL IMPERVIOUS SITE AREA = 2.83 ACRES

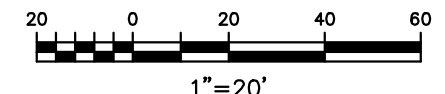
MAP REFERENCE

1. "Proposed Building Addition, Topographic Map, Barbour & Barbour Associates, Inc, Edwin Road South Windsor, Conn." scale: 1"=40' dated 4/16/84 prepared by Paimber & Russo.

LEGEND

- Edge Of Building
- Property Line
- Drainage Area Divide
- Tree Line
- Tree Existing Brook
- Guide Rail
- Drainage Swale (Flow Direction)
- Catch Basin
- Roof HVAC Unit
- Transformer
- Roof Leader / Drain
- Stormwater Flow Direction
- Stormwater Discharge Sampling Location
- Process Vent
- Roof Section
- Municipal Stormwater System
- Potential Habitat for Endangered or Threatened Species

NOTES:
 1. POLLUTION SOURCES CAN BE FOUND IN TABLE 4.3.
 2. ALL LOCATIONS OF SITE FEATURES ARE APPROXIMATE.
 THIS PLAN SHOULD NOT BE USED FOR CONSTRUCTION OR LAND CONVEYANCE PURPOSES.



STAMP	
 Loureiro Engineering Associates, Inc. 100 JUDY STREET, SOUTH WINDSOR, CT 06074 Phone: 860-747-0511 • Fax: 860-747-8822 An Equal Opportunity Employer	DATE: 03/10/2026 DRAWN BY: PHC APPROVED BY: JGP
SCALE: 1"=20' DRAWING NO.: 048SW1.02	DATE: 03/10/2026 DRAWN BY: PHC APPROVED BY: JGP
SITE PLAN STORMWATER POLLUTION PREVENTION PLAN 31 EDWIN ROAD, SOUTH WINDSOR, CT 06074 MILLROCK PACKAGING PARTNERS LLC 31 EDWIN ROAD, SOUTH WINDSOR, CT 06074	
DRAWING DRAWING 1	
SHEET NO. 1	NO. OF SHEETS 1
REV.	DATE
DESCRIPTION OF REVISION APPR.	

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 B.

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 personnel on May 21, 2024, during dry weather conditions. Employees were interviewed, and a visual inspection of the grounds and the stormwater catch basins was conducted. Loureiro did not observe any interior floor drains at the Site during the inspection, and MillRock confirmed that none exist.

The following areas were directly observed during the evaluation:

- Stormwater sampling location SWD-001 in Drainage Area 001;
- Two catch basins on Edwin Road (SWD-002 and SWD-003);
- Roof areas and roof drains in Drainage Areas 001, 002, and 003; and,
- All paved areas of the Site.

During the inspection, water discharge was observed from outfall SWD-003. The flow was minor, appearing as a low-flow trickle of water rather than a continuous or substantial discharge. To evaluate the potential source and determine whether it constituted an unauthorized non-stormwater discharge, Millrock conducted visual monitoring as part of routine monthly stormwater inspections between September 2025 and February 2026.

Monitoring included documentation of the presence or absence of the trickle, recent precipitation history, ambient weather conditions, and operational status of the facility's irrigation system. During this period, the trickle from SWD-003 was observed even when the irrigation system was not operating and was absent during extended dry weather conditions. No indicators of industrial process water, sanitary wastewater, or other unauthorized non-stormwater discharges were identified.

Based on these observations and considering the minimal volume and intermittent nature of the flow, the discharge observed at SWD-003 is attributed to groundwater intrusion rather than an unauthorized non-stormwater discharge. Records of these evaluations are maintained on-site with this Plan.

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		

APPENDIX E

Spill Response Procedures

SPILL RESPONSE PROCEDURES

General Spill Response Procedures

To minimize hazards to human health, the environment, and property caused by any unplanned release of oil or chemical products, Mill Rock shall implement the following spill response procedures. Immediate actions and notifications to be employed in the event of a spill or release are outlined below.

These 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 shall 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 shall not take undue risks with personal safety or endanger others while attempting to limit a release. Decisions regarding response actions beyond initial containment shall be made by the 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 shall be cleaned using appropriate absorbents, neutralizing agents, or cleaning materials compatible with the spilled substance. All materials used during cleanup shall 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 shall be properly decontaminated or disposed of as waste, as appropriate.

Recovered Spill Material

All recovered spill material and cleanup debris shall 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 shall 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 shall 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.

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.

Spill Control Equipment

The following spill control equipment shall be readily available and maintained:

- Speedi-Dri® or equivalent absorbent
- Absorbent pads, socks, or booms
- Empty drum or compatible containers for spill collection
- Mop, broom, shovel and squeegee
- PPE including goggles, gloves, boots, and protective clothing appropriate for oil and chemical spills

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

APPENDIX G

Monthly Inspection Form

MILL ROCK PACKAGING PARTNERS LLC
 South Windsor, 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 | <input type="checkbox"/> Plant refuse and cardboard compactors
<input type="checkbox"/> Cardboard trim collection system
<input type="checkbox"/> Storage trailers
<input type="checkbox"/> Wood pallet dumpster
<input type="checkbox"/> Electrical transformer
<input type="checkbox"/> Glycol chiller
<input type="checkbox"/> HVAC units
<input type="checkbox"/> Roof exhaust vents | Stormwater
discharge
points | <input type="checkbox"/> SWD-001: curb cut behind the facility
<input type="checkbox"/> SWD-002: catch basin on Edwin Road
<input type="checkbox"/> SWD-003: catch basin on Edwin Road |
| Other | <input type="checkbox"/> Temporary sand/salt storage | | |

*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.

APPENDIX H

Semiannual Comprehensive Compliance Evaluation Form

MILL ROCK PACKAGING PARTNERS LLC
 South Windsor, 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. <ul style="list-style-type: none"> • 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? <ul style="list-style-type: none"> • If so, were the spills or leaks documented in Appendix D? 		

MILL ROCK PACKAGING PARTNERS LLC
 South Windsor, 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? <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> • 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? <ul style="list-style-type: none"> • 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? <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> • Has annual training been performed? <ul style="list-style-type: none"> ○ 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? 		

MILL ROCK PACKAGING PARTNERS LLC
 South Windsor, Connecticut
Semi-Annual Comprehensive Compliance Evaluation Form

Site Inspection		
Evaluation Criteria	Responses, Observations, and Comments	Is Remedial Action Required? (Yes/No)
<i>Interior Facility Walk-Through:</i> 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.		
<i>Roof Inspection:</i> 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.		

MILL ROCK PACKAGING PARTNERS LLC
 South Windsor, 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

Mill Rock commenced benchmark monitoring in March of 2012, and continued to do so until October of 2016. The facility earned a benchmark monitoring exemption for the remainder of the previous permit term after the average of the latest four (4) consecutive measurements for all parameters did not exceed the benchmark thresholds.

Table 1: Benchmark Monitoring Sampling Results

SWD-001													
Sample Date Parameter	Semiannual periods										Avg.	Bench- mark	Units
	1	2	3	4	5	6	7	8	9	10			
	4/18/2012	2/27/2013	SKIPPED	1/13/2014	SKIPPED	SKIPPED	6/15/2015	3/14/2016	7/29/2016	10/27/2016			
Oil & Grease, Hexane Ext. Material	4	10.0	-	3.4	-	-	0.7	1.7	1.7	3.5	1.9	5.0	mg/L
Sample pH	5.73	6.7	-	5.83	-	-	4	6.6	6.09	6.5	5.8	5-9 SU	S.U.
Chemical Oxygen Demand	113	146	-	410	-	-	12	43	36	120	52.8	75	mg/L
Total Suspended Solids	140.0	45.0	-	92	-	-	2.5	38	33.6	124	49.5	90	mg/L
Phosphorus, Total	0.56	0.024	-	1.49	-	-	0.04	0.101	0.077	0.169	0.097	0.40	mg/L
Total Kjeldahl Nitrogen	5.3	1.43	-	3.7	-	-	0.35	3.7	1.9	1.5	1.86	2.30	mg/L
Nitrate Nitrogen as N	0.56	0.06	-	0.025	-	-	0.25	0.53	0.46	0.23	0.37	1.10	mg/L
Copper	0.076	0.034	-	0.182	-	-	0.0025	0.0025	0.0025	0.017	0.006	0.059	mg/L
Zinc	0.347	0.133	-	0.47	-	-	0.011	0.042	0.032	0.125	0.053	0.160	mg/L
Lead	0.012	0.011	-	0.016	-	-	0.003	0.005	0.005	0.005	0.005	0.076	mg/L

APPENDIX J

Deviations from Monitoring Schedule

APPENDIX K

Quarterly Visual Assessment Form

MILL ROCK PACKAGING PARTNERS LLC
South Windsor, 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: _____

Discharges Represented: _____

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			

MILL ROCK PACKAGING PARTNERS LLC

South Windsor, 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

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.

Appendix G

Corrective Action Measure Requirements & Waiver Request

Section 1. Corrective Action Measure Documentation Submission Type	
General Corrective Action Measure Documentation	<input type="checkbox"/>
Violation of an Effluent Limitations Guideline	<input type="checkbox"/>
Unauthorized spill, leak, release, or discharge	<input type="checkbox"/>
Request for an Extension to CAM Timelines	<input type="checkbox"/>
Request for a Waiver from Further Corrective Action Measures and/or Monitoring ²	<input type="checkbox"/>

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	<input type="checkbox"/>
Effluent Limit Exceedance	A discharge exceeds a numeric effluent limitation guideline	<input type="checkbox"/>
Unauthorized release or discharge	Spill, leak, release, or discharge of non-stormwater not authorized by this permit or another permit	<input type="checkbox"/>
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	<input type="checkbox"/>
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	<input type="checkbox"/>
Control Measure Never Designed, Installed, Implemented, or Maintained	A required control measure was never designed, installed, or implemented	<input type="checkbox"/>
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	<input type="checkbox"/>
Visual Assessment Shows Evidence of Pollution	Color, odor, floating solids, settled solids, suspended solids, or foam observed in discharge water	<input type="checkbox"/>
Other Corrective Actions (as Required by the Commissioner)	The Commissioner may utilize enforcement discretion to require additional corrective actions in response to permit violations	<input type="checkbox"/>

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		
<input type="checkbox"/> 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)	
<input type="checkbox"/> 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)	
<input type="checkbox"/> 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

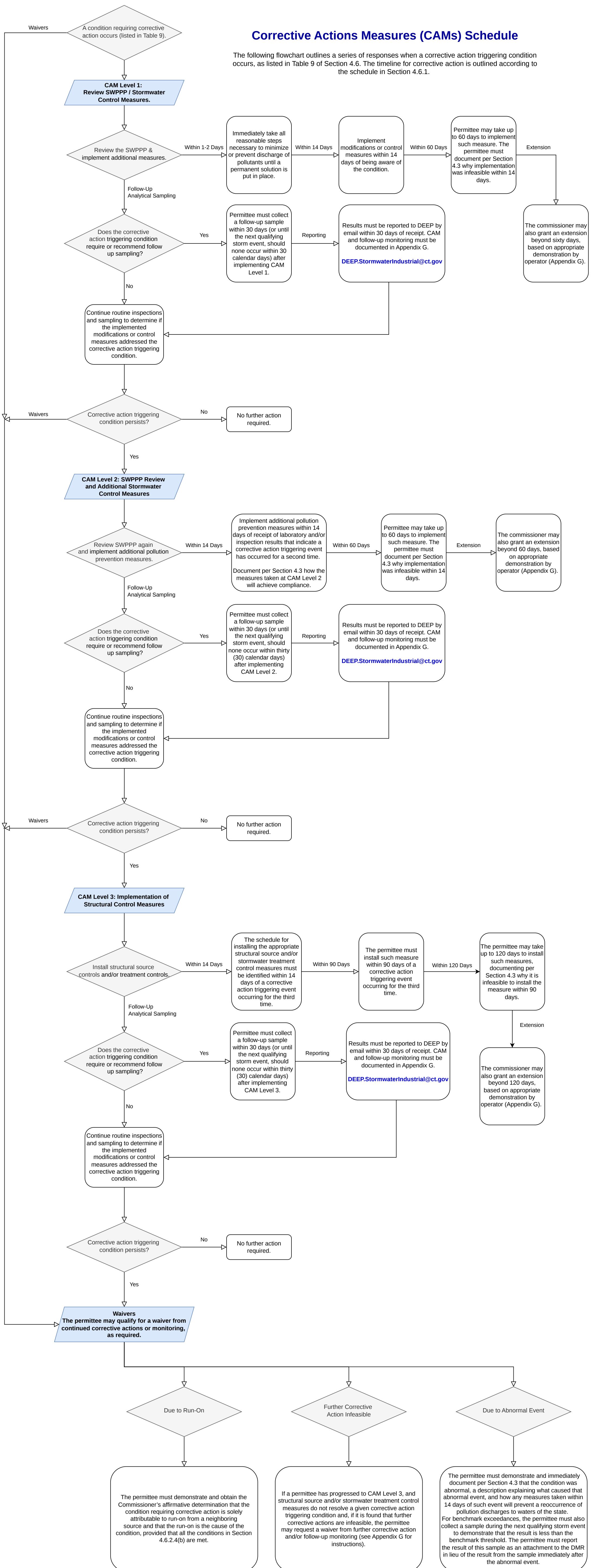
Corrective Action Measure Requirements & Waiver Request

Section 5. Additional Information (check all that apply)

<input type="checkbox"/> Follow-up photographs	Please describe any photographs taken and attach them to the end of this document.			
<input type="checkbox"/> Request for an extension	Please describe the request for an extension for CAM implementation. Please see the permit for criteria applicable to exemptions.			
<input type="checkbox"/> 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	<p>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.</p>			
	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 24, 2026.	Montserrat Sanchez-Guzman, Senior Engineer, EHS	
1					
2					
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9					
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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.