

**TEXTRON Lycoming**

Stratford Division  
Textron Lycoming/  
Subsidiary of Textron Inc.

550 Main Street  
Stratford, CT 06497  
203/385-2000

November 30, 1993

Edward Parker, Director  
Permits, Enforcement & Remediation  
Division  
Bureau of Water Management  
Connecticut Department of  
Environmental Protection  
79 Elm Street  
Hartford, CT 06016

RE: Clean Water Act Administrative Order  
Docket No. 93-35

Dear Mr. Parker:

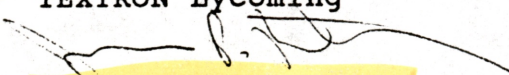
Please find attached the following information:

A description of the costs and schedule associated with redirection of oil source discharges to the sanitary sewer.

An evaluation of Genovese Associates' July 16, 1993, Storm System/Oil Abatement System Capacity Analysis.

If you have any questions regarding this information please call me at (203) 385-3741. Thank you.

Sincerely,  
**TEXTRON Lycoming**

  
**James P. Runstadler**  
Manager, Environmental Services

JPR/vzb  
Attachment

## **Oil Source Discharges**

Textron Lycoming is proposing to incorporate the following changes to existing discharge processes:

### **Building 67 Steam Cleaning Operation:**

Textron is proposing to direct the Steam Cleaning discharge to the sanitary sewer. Analysis results indicate that because of high emulsified oil content an ultrafiltration system will be required to lower oil and grease levels sufficient to meet POTW limits. This system is being incorporated into the design of the building. Expected completion date for installation of the system and discharge to the sanitary sewer is July 31, 1994. Estimated additional cost for the filtration system is \$60,000 with annual maintenance costs of \$1,500.

### **Chip Pit and Scrap Yard:**

The Scrap Yard is being modified to eliminate the discharge. The chip containers are being placed on a covered bermed area. All fluids will be collected for proper disposal.

The Chip Pit is also being redesigned. Evaluations are continuing on a chip washing process to clean the chips and eliminate the source of oil. As with the scrap yard, all fluids will be collected for proper disposal. In the event the chip washing process necessitates a discharge, a filtration system will be implemented to meet sanitary sewer discharge limits. If required, the cost of the filtration system is estimated to be \$75,000.

Both projects will be completed by April 30, 1994.

### **Building 16 Test Cells:**

Textron is proposing to direct the Test Cell discharge to the sanitary sewer. Analysis results indicate that at a minimum an ultrafiltration system will be required to meet sanitary sewer discharge limitations. Proposals are being requested from filtration vendors for system design and cost.

The following schedule for implementation of the filtering system is provided:

January 31, 1994: Filter Selection  
March 31, 1994: System Design  
August 31, 1994: System Installation

The current estimated cost for the system is \$200,000 with annual operation and maintenance costs of \$3,000.

## Storm System/Oil Abatement System Capacity Analysis

The following response is provided to Genovese Associates' analysis:

1. Direct discharges from the pump station can be minimized by altering pump control settings in Stations 37, 64, and 40.

This recommendation was accepted and the pump control settings in all six pump houses were set to minimize abort discharges while still preventing flooding of the plant. The new pump controls currently being installed as part of the renovation of the treatment plant, will also be set to minimize abort discharges.

2. Additional flows can be stored for treatment by installing pumps in the bottom of the surge tank to utilize the lower 10 feet of the tank which is currently dead storage.
3. The current treatment plant is set to operate at a maximum capacity of 4 mgd. The probability is high that the capacity can be doubled with minimal equipment changes.

A review of these recommendations indicate that they will have minimal effect on minimizing abort discharges. These proposed recommendations will not eliminate any abort discharges directly from the six pumphouses, but only potentially reduce the overflows of the surge tank. Since the surge tank currently has settling capability and a goosenecked overflow to prevent discharge of floating oils, it is believed minimal contaminants are discharged from the surge tank.

Implementation of these proposals would require an alteration in the existing gravity fed treatment system and though actual equipment changes may be minimal increased maintenance and operation costs would be significant.

Textron prefers to direct its pollution control efforts on direct sources instead of end of the pipe treatment systems. It is believed that the current projects focusing on point source controls will be sufficient to correct the problem. In the event further measures are required, this proposal can be reevaluated.