

TEXTRON Lycoming

Stratford Division
Textron Lycoming /
Subsidiary of Textron Inc.

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

November 8, 1991

CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Carrie Correll
DEP/Bureau of Water Management
122 Washington Street
Hartford, CT 06106

RE: DMR Permit Number CT00002984
Total Suspended Solids Violations - April, May, June 1991

Dear Ms. Correll:

As was discussed with you on November 4, 1991, the violations letter dated September 19, 1991 was not received by the Environmental Department until October 31, 1991. In the future please address correspondence to the attention of Mr. Robert Kelley, Manager Environmental Services.

Enclosed are the cover letters that were sent with the Discharge Monitoring Reports for the months of April, May, and June 1991. As was outlined in the letters, the suspended solids are the result of runoff from yard areas, parking areas, and roadways. These paved areas frequently accumulate roadway dirt and sediment. This accumulated dirt settles in the stormwater basins during "dry weather" flow conditions and then is stirred up and discharged through the activation of our large stormwater abort pumps.

The water treatment system at Textron may be unique in that it not only handles process cooling water and roof runoff but all of the outside ground drains for the main plant area. The total drainage area encompasses 44.4 acres. Thus during periods of heavy rain, the volume of water entering the system exceeds the short term capacity of the water treatment unit. In order to prevent the flooding of the plant, this excess water is discharged through the pumphouses directly to the tidal basin / mudflat along the Housatonic River. Because of the volume of water passing through the pumphouses and the large capacity of the abort pumps, the stormwater in the pumphouses becomes agitated and any accumulated sediment can become suspended in the stormwater and discharged during an abort.

Textron has taken a number of measures to reduce the levels of suspended solids in the stormwater aborts. A significant amount of

sediment can accumulate in the bottom of the pumphouses and be discharged by the abort pumps. During the plant shutdown July 29, 1991 through August 9, 1991 the sumps inside the pumphouses were cleaned. Sediment that had accumulated during the past year was removed from the sumps.

Two measures were taken to prevent the future accumulation of this sediment in the water system and pumphouses. First, a yard sweeping program was instituted by the Maintenance Department. Under this program the yard areas susceptible to the accumulation of sediment that can enter the drainage areas are cleaned weekly. Second, all areas of possible sediment generation, i.e. construction sites, winter sand piles, etc., were bermed with plastic barriers or hay bales. The Plant Engineering Department has required all contractors and in plant personnel performing excavation work to utilize barriers to prevent the transport of sediment from the construction site to drainage areas.

The water treatment system is currently scheduled to be renovated by the U.S. Army Corps of Engineers in 1992. Under part of this renovation the capacity of the dry weather pumps is to be expanded. This pump expansion will increase the capability of the pumphouses to transfer stormwater to the treatment system and thus reduce the number of aborts directly to the river.

These efforts at sediment control should reduce the amount of sediment and debris accumulating in the manholes, piping, and pumphouses and hopefully reduce solids levels in future stormwater aborts. We would appreciate the opportunity meet with you and discuss this matter. If you have any questions please contact James Runstadler (203) 385-3741.



R.F. Kelley
Mgr., Environmental Svcs.