

March 22, 1995

NOV Coordinator
Department of Environmental Protection
Water Management Bureau
Permitting, Enforcement and Remediation
Hartford, Connecticut 06106-5127

Dear NOV Coordinator:

This letter is in response to the Notice of Violation (NOV) issued to AlliedSignal Engines on February 27, 1995. AlliedSignal is the Operator of the facility that is the subject of the NOV. The facility is owned by the U.S. Army and is known as the Stratford Army Engine Plant (SAEP). The SAEP's location is 550 Main Street Stratford CT (Permit# 0002984).

There are five effluent limitation excursions cited in the NOV. Two of these excursions occurred in September, 1994, while Textron Lycoming was the Operator of the facility. The other three excursions occurred in December, 1994, after AlliedSignal assumed operational control of the SAEP (on October 28, 1994).

The effluent limitation exceedances in the NOV are for suspended solids and oil & grease in the stormwater discharges (DSN #'s 001-006). Suspended solid and oil & grease permit excursions in the stormwater discharges have been the subject of a number of EPA and DEP compliance actions against the operators of the SAEP.

The US Army has funded a number of source control projects to eliminate sources of oil & grease in the facility's stormwater system. Seven of these projects were mandated in an EPA Administrative Order on September 30, 1993. The source control projects were completed in August, 1995, and have reduced the frequency and magnitude of permit excursions.

In response to the continuing excursions, AlliedSignal submitted a Request for Permit Modification to the DEP on March 20, 1995 (enclosed). In addition to the Permit Modification, AlliedSignal has identified three future source control projects. The source control projects include the re-engineering of two scrap yards and the installation of at least six sand/silt retention catch basins throughout the facility. The Army has expressed its willingness to fund future source control projects, pending the completion of an engineering study and the submission of a

formal proposal. The source control project proposal will be submitted to the Army in May, 1995.

COMPLIANCE STATEMENT

Facility name: Allied Signal Engines Stratford Army Engine Plant
Address: 550 Main Street
Stratford, CT 06497

In accordance with the direction in the above referenced Notice, I certify that the noted violations will be addressed in the following manner:

Oil & Grease and Suspended Solids Violations

The oil & grease and suspended solids violations at the Stratford Army Engine Plant will be addressed by the submission of a Request For Permit Modification to increase permitted levels of oil & grease and suspended solids in the stormwater discharges (DSN #'s 001-006, Permit # CT0002984). In addition to the Permit Modification, AlliedSignal will oversee three Army funded source control projects designed to reduce the amount of oil & grease and suspended solids in the stormwater discharges. These projects will include the re-engineering of two (2) outside scrap yards and the installation of at least six (6) catch basins.

Certification of Accuracy

I certify that the information in this Compliance Statement and its attachments is true, accurate and complete, and I understand that any false statement may be punishable as a criminal offense under Conn. Gen. Stat. Sections 22a-6 and 53a-157.

03/23/95
Date

203-385-5124
Telephone

03/23/95
Date

203-385-3590
Telephone

James Morrell
Environmental Engineer

James Morrell
Signature

Michael Meshay
Facility Manager

Mike Meshay by Tim Russell
Signature