



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

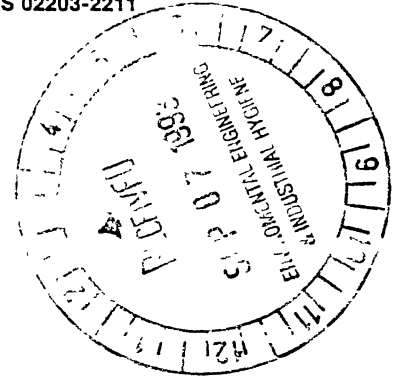
REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

September 1, 1993

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Robert Dennis  
Director of Manufacturing Services  
AVCO Corporation  
Textron Lycoming Turbine Engine Division  
Stratford Army Engine Plant  
550 Main Street  
Stratford, CT 06497



Re: NPDES Permit No. CT0002984

Dear Mr. Dennis:

Enclosed is an Administrative Order issued pursuant to Section 309(a)(3) of the Clean Water Act, 33 U.S.C. §1319(a)(3). The Order is based upon violations of the above-referenced NPDES permit. Specifically, the AVCO Corporation, Textron Lycoming Turbine Engine Division (AVCO) has violated the total suspended solids and oil and grease limitations contained in its NPDES Permit for Discharge Nos. 001 through 006.

The Order requires that AVCO submit an engineering report to EPA and the CTDEP, which, at a minimum, includes the following:

- (a) An evaluation of the alternatives and costs associated with directing the discharges from the proposed Building No. 67 Steam Cleaning operations, Chip Pit and Scrap Yard operations, and Building No. 16 Test Cell operations oil and water separators to sanitary sewers, and proposed schedules for implementing the recommended alternatives; and
- (b) A proposed schedule for implementing the recommendations of the Genovese Associates' July 16, 1993, Storm System/Oil Abatement System Capacity Analysis. If certain proposals of the report are rejected, an explanation of the reasons for the rejection shall accompany the proposed implementation schedule.

In addition, the Order contains a number of construction milestones, which have been proposed to return your facility's storm water overflows to compliance with its NPDES limitations.

By issuance of this Order, EPA is not waiving its right to take further enforcement actions under Section 309 of the Act for any violations cited in this Order. In addition, violation of any



condition of this Order may subject AVCO to further enforcement actions under Section 309 of the Act, in which injunctive relief and/or penalties could be sought.

If you have any questions concerning the terms of this Order, please contact Michael Fedak of the Permit Compliance Section at (617)565-3481.

Sincerely,

A handwritten signature in cursive script, appearing to read "David A. Fierra".

David A. Fierra, Director  
Water Management Division

cc: CTDEP  
    (attn: E. Parker  
          M. DiNoia)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

IN THE MATTER OF ) DOCKET NO. 93-35  
)  
AVCO CORPORATION )  
TEXTRON LYCOMING TURBINE )  
ENGINE DIVISION )  
STRATFORD, CONNECTICUT )  
CT0002984 ) AND  
)  
Proceedings under Section 309(a)(3) ) ORDER FOR COMPLIANCE  
of the Clean Water Act, as amended, )  
33 U.S.C. §1319(a)(3) )

I. STATUTORY AUTHORITY

The following findings are made and ORDER issued pursuant to Section 309(a)(3) of the Clean Water Act, as amended (the "Act"), 33 U.S.C. §1319(a)(3), which grants to the Administrator of the U.S. Environmental Protection Agency ("EPA") the authority to issue orders requiring persons to comply with Sections 301, 302, 306, 307, 308, 318 and 405 of the Act and any permit condition or limitation implementing any of such sections in a National Pollutant Discharge Elimination System ("NPDES") permit issued under Section 402 of the Act, 33 U.S.C. §1342. This authority has been delegated to EPA's Regional Administrators.

The Order herein is based on findings of violations of Section 301 of the Act, 33 U.S.C. §1311, and the conditions of NPDES Permit No. CT0002984. Pursuant to Section 309(a)(5)(A) of the Act, 33 U.S.C. §1319(a)(5)(A), the Order provides a schedule for compliance which the Regional Administrator has determined to be reasonable.

## II. FINDINGS

The Regional Administrator makes the following findings of fact:

1. The AVCO Corporation, Textron Lycoming Turbine Engine Division ("the Permittee"), located in Stratford, Connecticut, is a person under Section 502(5) of the Act, 33 U.S.C. §1362(5). The Permittee, through its Textron Lycoming Turbine Engine Division, operates the Stratford Army Engine Plant (the "Engine Plant") pursuant to a Consolidated Facilities Contract with the U.S. Army Aviation Systems Command, which owns the plant. The Engine Plant is a facility for the manufacture of gas turbine aircraft and land vehicle engines.
2. The Permittee is the operator of the Stratford Army Engine Plant, located in Stratford, Connecticut, and from which pollutants, as defined in Section 502(6) and (12) of the Act, 33 U.S.C. §1362(6) and (12), are discharged from point sources, as defined in Section 502(14) of the Act, 33 U.S.C. §1362(14), to the Housatonic River. The Housatonic River is a Class S<sub>C</sub>/S<sub>B</sub> waterway and a navigable water under Section 502(7) of the Act, 33 U.S.C. §1362(7).
3. The Permittee discharges untreated stormwater from Discharge Nos. 001 through 006, treated stormwater, non-contact cooling water and boiler blowdown through Discharge No. 007, and treated metal finishing wastewaters through Discharge No. 008.

4. On July 10, 1991, the Permittee was reissued NPDES Permit No. CT0002984 (the "Permit") by the Commissioner of the Connecticut Department of Environmental Protection (the "CTDEP"), under authority given to the Administrator of EPA by Section 402 of the Clean Water Act, 33 U.S.C. §1342. This authority has been delegated by the Administrator of EPA to the Regional Administrator of EPA, Region I, who has in turn delegated this authority to the Commissioner of the CTDEP.
5. The current and previous Permit authorized the Permittee to discharge pollutants from point sources at the Engine Plant to the Housatonic River subject to the effluent limitations, monitoring requirements and other conditions specified in the Permit.
6. Section 301(a) of the Act, 33 U.S.C. §1311(a), makes unlawful the discharge of pollutants to waters of the United States except, among other things, in compliance with the terms and conditions of an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. §1342.
7. Part 2.A. of the current and previous Permits contained the effluent limitations and monitoring requirements for Discharge Nos. 001 through 006. Since August, 1990, the Permittee has violated the effluent limits for total suspended solids and oil and grease imposed on these discharges (See Attachment No. 1).

8. The Permittee's discharge of wastewater to the Housatonic River in violation of its current and previous Permit violates Section 301(a) of the Act, 33 U.S.C. §1311(a).

### III. ORDER

Accordingly, it is hereby ordered that the Permittee shall:

1. By August 31, 1993, complete construction of berms around the steam cleaning areas contiguous to Building No. 9.
2. By October 31, 1993, complete construction of the Pump Station No. 36 dry weather pumping capacity upgrade.
3. By November 30, 1993, submit to EPA and the CTDEP an engineering report which, at a minimum, includes the following:
  - (a) An evaluation of the alternatives and costs associated with directing the discharges from the proposed Building No. 67 Steam Cleaning operations, Chip Pit and Scrap Yard operations, and Building No. 16 Test Cell operations oil and water separators to sanitary sewers, and proposed schedules for implementing the recommended alternatives;
  - (b) A proposed schedule for implementing the recommendations of the Genovese Associates' July 16, 1993, Storm System/Oil Abatement System Capacity Analysis. If certain proposals of the report are rejected, the reasons for the rejection shall accompany

the proposed implementation schedule; and

(c) Upon EPA's written approval of the schedules submitted pursuant to paragraph III.3.(a) and (b), the schedules shall be incorporated into this Order and shall be enforceable hereunder.

4. By March 31, 1994, complete construction of the Building No. 16 engine test cell sumps.
5. By January 1, 1994, begin construction of the consolidation of the Building No. 2 and Building No. 9 steam cleaning operations and the construction of an oil and water separator to treat the oily wastewaters generated by these operations.
6. By January 1, 1994, begin construction of an oil and water separator designed to treat oily wastewaters generated during the Chip Pit and Scrap Yard operations.
7. By January 1, 1994, begin construction of the waste tank farm alterations necessary to allow oil to be pumped directly to the waste oil tanks, which eliminates the need for the oil transfer sumps.
8. By April 30, 1994, complete construction of the facilities described under paragraph 6.
9. By June 30, 1994, complete the installation of all drip pan additions to the engine test stands in Building Nos. 6 and 16.
10. By July 31, 1994, complete construction of the facilities described under paragraph 5.

11. By July 31, 1994, complete construction of the facilities described under paragraph 7.
12. The Permittee shall continue to monitor its effluent from Discharge Nos. 001 through 006, for all parameters, as required by the Permit.

#### IV. NOTIFICATION PROCEDURES

1. Where this Order requires a specific action to be performed within a certain time frame, the Permittee shall submit a written notice of compliance or noncompliance with each deadline. Notification must be mailed within fourteen (14) days after each required deadline. The timely submission of a required report shall satisfy the requirement that a notice of compliance be submitted.
2. If noncompliance is reported, notification shall include the following information:
  - a. A description of the noncompliance;
  - b. A description of any actions taken or proposed by the Permittee to comply with the elapsed schedule requirements;
  - c. A description of any factors that explain or mitigate the noncompliance;
  - d. An approximate date by which the Permittee will perform the required action.
3. After a notification of noncompliance has been submitted, compliance with the overdue requirement shall be reported by



submitting any required documents or providing EPA with a written report indicating that the required action has been achieved.

4. Submissions required by this Order shall be in writing and shall be mailed to the following addresses:

David A. Fierra, Director  
Water Management Division  
U.S. Environmental Protection Agency  
P.O. Box 8127  
Boston, MA 02114  
Attn: Michael W. Fedak

Edward Parker, Director  
Permits, Enforcement & Remediation  
Division  
Bureau of Water Management  
Connecticut Department of  
Environmental Protection  
Water Management Bureau  
79 Elm Street  
Hartford, CT 06106

#### V. GENERAL PROVISIONS

1. The Permittee may, if it desires, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to the Permittee. The Permittee should read the above-cited regulations carefully before asserting a business confidentiality claim since

certain categories of information are not properly the subject of such a claim. For example, the Clean Water Act provides that "effluent data" shall in all cases be made available to the public. See Section 308(b) of the Act, 33 U.S.C. § 1318(b).

2. This Order does not constitute a waiver or a modification of the terms and conditions of the Permit. The Permit remains in full force and effect. EPA reserves the right to seek any and all remedies available under Section 309 of the Act, 33 U.S.C. § 1319, as amended, for any violation cited in this Order.

3. This Order shall become effective upon receipt by the Permittee.

Aug 30, 1993

Date

Paul Keough

Paul Keough  
Acting Regional Administrator  
U. S. Environmental Protection  
Agency - Region I

DISCHARGE NO. 001

DMR VIOLATION SUMMARY REPORT

AVCO CORPORATION - TEXTRON LYCOMING

NPDES NO. CT0002984

SOLIDS, TOTAL SUSPENDED

	MNTH AVG	DLY MAX	MG/L
Limits:	20.0	30.0	
10/31/90	*89.0	*89.0	
05/31/91	*56.4	*98.0	
06/30/91	*67.5	*79.0	
07/31/91	*158.0	*158.0	
09/30/91	*45.0	*48.0	
10/31/91	*38.0	*38.0	
11/30/91	*204.0	*204.0	
01/31/92	*366.0	*366.0	
03/31/92	*60.0	*60.0	
05/31/92	*135.5	*163.0	
06/30/92	*36.9	*62.0	
07/31/92	*200.2	*374.0	
08/31/92	*292.2	*464.0	
09/30/92	*204.3	*276.0	
10/31/92	*206.0	*206.0	
04/30/93	* 27.0	27.0	

OIL AND GREASE

FREON EXTR-GRAV METH

	MNTH AVG	DLY MAX	MG/L
Limits:	10.0	15.0	
10/31/90	*23.0	*23.0	
08/31/91	8.3	*19.0	
01/31/92	*64.4	*64.4	
03/31/92	*15.0	15.0	
05/31/92	*13.4	*18.0	
06/30/92	*12.1	*40.0	

\* Effluent Violation

DISCHARGE NO. 002

DMR VIOLATION SUMMARY REPORT

AVCO CORPORATION - TEXTRON LYCOMING

NPDES NO. CT0002984

SOLIDS, TOTAL SUSPENDED

	MNTH AVG	DLY MAX	
Limits:	20.0	30.0	MG/L
05/31/91	*255.3	*255.3	
07/31/91	*59.0	*59.0	
08/31/91	20.0	*38.0	
09/30/91	*66.0	*66.0	
10/31/91	*89.0	*161.0	
03/31/92	*50.0	*50.0	
07/31/92	*94.0	*176.0	
08/31/92	15.1	*31.0	
10/31/92	*342.0	*342.0	

OIL AND GREASE

FREON EXTR-GRAV METH

	MNTH AVG	DLY MAX	
Limits:	10.0	15.0	MG/L
05/31/91	*98.5	*98.5	
08/31/91	*13.3	*16.0	
09/30/91	*11.6	11.6	
03/31/92	*25.0	*25.0	
10/31/92	*245.2	*245.2	

\* Effluent Violation

DISCHARGE NO. 003

DMR VIOLATION SUMMARY REPORT

AVCO CORPORATION - TEXTRON LYCOMING

NPDES NO. CT0002984

SOLIDS, TOTAL SUSPENDED

	MNTH AVG	DLY MAX	
Limits:	20.0	30.0	MG/L
10/31/90	*107	*107	
04/30/91	*57.5	*57.5	
05/31/91	*41.4	*41.4	
06/30/91	*96.0	*96.0	
07/31/91	*195.0	*195.0	
08/31/91	*22.0	22.0	
08/31/92	*151.1	*210.0	

OIL AND GREASE

FREON EXTR-GRAV METH

	MNTH AVG	DLY MAX	
Limits:	10.0	15.0	MG/L
10/31/90	*15	15	
05/31/91	*11.0	11.0	
06/30/91	*28.5	*28.5	
07/31/91	*68.0	*68.0	
08/31/91	*18.0	*18.0	
08/31/92	*36.0	*85.0	

\* Effluent Violation

DISCHARGE NO. 004

DMR VIOLATION SUMMARY REPORT

AVCO CORPORATION - TEXTRON LYCOMING

NPDES NO. CT0002984

SOLIDS, TOTAL SUSPENDED

	MNTH AVG	DLY MAX	
Limits:	20.0	30.0	MG/L
05/31/91	*164.0	*164.0	
07/31/91	*180.0	*180.0	
08/31/91	*30.0	*42.0	
11/30/91	*316.0	*316.0	
07/31/92	*70.0	*70.0	
08/31/92	*151.2	*350.0	
09/30/92	*114.0	*114.0	
10/31/92	*188.0	*188.0	
11/30/92	*532.0	*532.0	

OIL AND GREASE

FREON EXTR-GRAV METH

	MNTH AVG	DLY MAX	
Limits:	10.0	15.0	MG/L
05/31/91	*14.0	14.0	
07/31/91	*14.0	14.0	
11/30/91	*24.0	*24.0	
07/31/92	*31.0	*31.0	
08/31/92	*40.4	*81.0	
09/30/92	*11.0	11.0	
10/31/92	*16.4	*16.4	
11/30/92	*137.6	*137.6	
04/30/93	*11.0	11.0	

\* Effluent Violation

DISCHARGE NO. 005

DMR VIOLATION SUMMARY REPORT

AVCO CORPORATION - TEXTRON LYCOMING

NPDES NO. CT0002984

SOLIDS, TOTAL SUSPENDED

Limits:	20.0	30.0	MG/L
10/31/90	* 40	* 40	
05/31/91	*236.0	*236.0	
07/31/92	* 36.7	* 46.0	
08/31/92	*264.0	*505.0	
09/30/92	*118.0	*118.0	
10/31/92	*302.0	*302.0	
12/31/92	*155.0	*155.0	
01/31/93	* 65.0	* 65.0	
03/31/93	*573.0	*573.0	
04/30/93	* 72.0	* 72.0	

OIL AND GREASE

FREON EXTR-GRAV METH

	MNTH AVG	DLY MAX	
Limits:	10.0	15.0	MG/L
05/31/91	* 95.0	* 95.0	
08/31/91	* 12.0	12.0	
07/31/92	* 17.6	* 42.0	
08/31/92	* 34.8	* 74.0	
10/31/92	*101.2	*101.2	
11/30/92	* 17.4	* 17.4	
12/31/92	* 42.0	* 42.0	
01/31/93	* 28.	* 28.8	
03/31/93	*433.2	*433.2	
04/30/93	* 17.4	* 17.4	

\* Effluent Violation

DISCHARGE NO. 006

DMR VIOLATION SUMMARY REPORT

AVCO CORPORATION - TEXTRON LYCOMING

NPDES NO. CT0002984

SOLIDS, TOTAL SUSPENDED

	MNTH AVG	DLY MAX	
Limits:	20.0	30.0	MG/L
08/31/90	*122	*122	
10/31/90	*27	27	
04/30/91	*35.0	*35.0	
05/31/91	*92.0	*92.0	
06/30/91	*47.5	*79.0	
07/31/91	*170.0	*170.0	
08/31/91	*55.7	*138.0	
09/30/91	*49.0	*76.0	
10/31/91	*138.0	*246.0	
11/30/91	*120.0	*120.0	
12/31/91	*73.0	*92.0	
01/31/92	*76.0	*76.0	
03/31/92	*124.0	*182.0	
05/31/92	*221.0	*288.0	
06/30/92	*123.1	*349.0	
07/31/92	*236.7	*283.0	
08/31/92	*166.1	*312.0	
09/30/92	*242.0	*388.0	
10/31/92	*100.0	*100.0	
11/30/92	*68.0	*68.0	
12/31/92	*198.0	*198.0	
01/31/93	*106.0	*106.0	

OIL AND GREASE

FREON EXTR-GRAV METH

	MNTH AVG	DLY MAX	
Limits:	10.0	15.0	MG/L
08/31/91	7.7	*16.0	
03/31/92	*15.7	*28.0	
11/30/92	*12.5	12.5	
01/31/93	*11.2	11.2	

\* Effluent Violation