

PRETREATMENT PERMIT

issued to

Sikorsky Aircraft Corporation  
6900 Main Street  
Stratford, Connecticut 06615-9129

Location Address:

6900 Main Street  
Stratford, Connecticut

Permit ID: SP0000551

Permit Expires: \_\_\_\_\_

**SECTION 1: GENERAL PROVISIONS**

- (A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403 (Title 40 of the Code of Federal Regulations, Part 403).
- (B) Sikorsky Aircraft Corporation, ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsections (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

Section 22a-430-3 General Conditions

- (a) Definitions
- (b) General
- (c) Inspection and Entry
- (d) Effect of a Permit
- (e) Duty
- (f) Proper Operation and Maintenance
- (g) Sludge Disposal
- (h) Duty to Mitigate
- (i) Facility Modifications; Notification
- (j) Monitoring, Records and Reporting Requirements
- (k) Bypass
- (l) Conditions Applicable to POTWs
- (m) Effluent Limitation Violations (Upsets)
- (n) Enforcement
- (o) Resource Conservation
- (p) Spill Prevention and Control
- (q) Instrumentation, Alarms, Flow Recorders
- (r) Equalization

Section 22a-430-4 Procedures and Criteria

- (a) Duty to Apply
- (b) Duty to Reapply
- (c) Application Requirements
- (d) Preliminary Review
- (e) Tentative Determination
- (f) Draft Permits, Fact Sheets
- (g) Public Notice, Notice of Hearing
- (h) Public Comments

- (i) Final Determination
  - (j) Public Hearings
  - (k) Submission of Plans and Specifications. Approval.
  - (l) Establishing Effluent Limitations and Conditions
  - (m) Case by Case Determinations
  - (n) Permit issuance or renewal
  - (o) Permit Transfer
  - (p) Permit revocation, denial or modification
  - (q) Variances
  - (r) Secondary Treatment Requirements
  - (s) Treatment Requirements for Metals and Cyanide
  - (t) Discharges to POTWs - Prohibitions
- (C) Violations of any of the terms, conditions or limitations contained in this permit may subject the Permittee to enforcement action, including but not limited to, penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA. Specifically, civil penalties of up to twenty-five thousand dollars may be assessed per violation per day.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner of Energy and Environmental Protection ("the Commissioner"). To request such approval, the Permittee and proposed transferee shall register such proposed transfer with the Commissioner at least thirty (30) days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the RCSA.
- (H) This permitted discharge is consistent with the applicable goals and policies of the Connecticut Coastal Management Act (section 22a-92 of the CGS).

## **SECTION 2: DEFINITIONS**

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and sections 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above, the following definitions shall apply to this permit:
- "----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the discharge monitoring report ("DMR").
- "Annually", in the context of a sampling frequency, means the sample must be collected in the month of February.
- "Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l). Otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.
- "Batch" means wastewater treated in an approved treatment tank at one time, without any additional water being added.
- "Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.
- "Daily Quantity" means the quantity of waste generated during an operating day.

“gpd” means gallons per day.

“gpm” means gallons per minute.

“Instantaneous Limit” means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l). Otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

“mg/l” means milligrams per liter.

"NA" as a Monitoring Table abbreviation means "not applicable".

"NR" as a Monitoring Table abbreviation means "not required".

"Quarterly", in the context of a sampling frequency, means samples must be collected in the months of February, May, August and November.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum of all values recorded as a result of analyzing each grab sample of; 1) a Composite Sample, or 2) a Grab Sample Average. For those permittees with continuous monitoring and recording pH meters, Range During Sampling shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"Range During Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Semi-Annually", in the context of a sampling frequency, means samples must be collected in the months of May and November.

“S.U.” means Standard Units.

"Sub-discharge" means a discharge described under Tables B, D, E, F, G and H of this permit.

### **SECTION 3: COMMISSIONER'S FINAL DETERMINATION**

- (A) The Commissioner has made a final determination and found that continuance of the existing system to treat discharge DSN 201 would protect the waters of the state from pollution and continuance of the existing discharges, designated as DSN 202, would not cause pollution of the waters of the state. The Commissioner's final determination is based on Application No. 201004466 for permit reissuance received on June 25, 2010 and the administrative record established in the processing of that application.
- (B) (1) From the issuance of this permit through and including [LAST DAY OF MONTH, MONTH OF PERMIT REISSUANCE], the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000551, issued by the Commissioner to the Permittee on December 23, 2005, the previous application submitted by the Permittee on July 23, 2003, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharges and/or activities authorized by, or associated with, Permit No. SP0000551, issued by the Commissioner to the Permittee on December 23, 2005.
- (2) From [FIRST DAY OF MONTH, MONTH FOLLOWING PERMIT REISSUANCE] until this permit expires or is modified or revoked, the Commissioner hereby authorizes the Permittee to discharge in accordance with the terms and conditions of Permit No. SP0000551, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE], Application No. 201004466 received by the Department on June 25, 2010, and all modifications and approvals issued by the Commissioner or the Commissioner's authorized agent for the discharge and/or activities authorized by, or associated with, Permit No. SP0000551, issued by the Commissioner to the Permittee on [DATE OF PERMIT ISSUANCE].
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate

effluent limitations, schedules of compliance, or other provisions that may be authorized under the Federal Clean Water Act or the CGS or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or CGS or regulations adopted thereunder which are then applicable.

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**SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

- (A) The discharges shall not exceed and shall otherwise conform to the specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables below.

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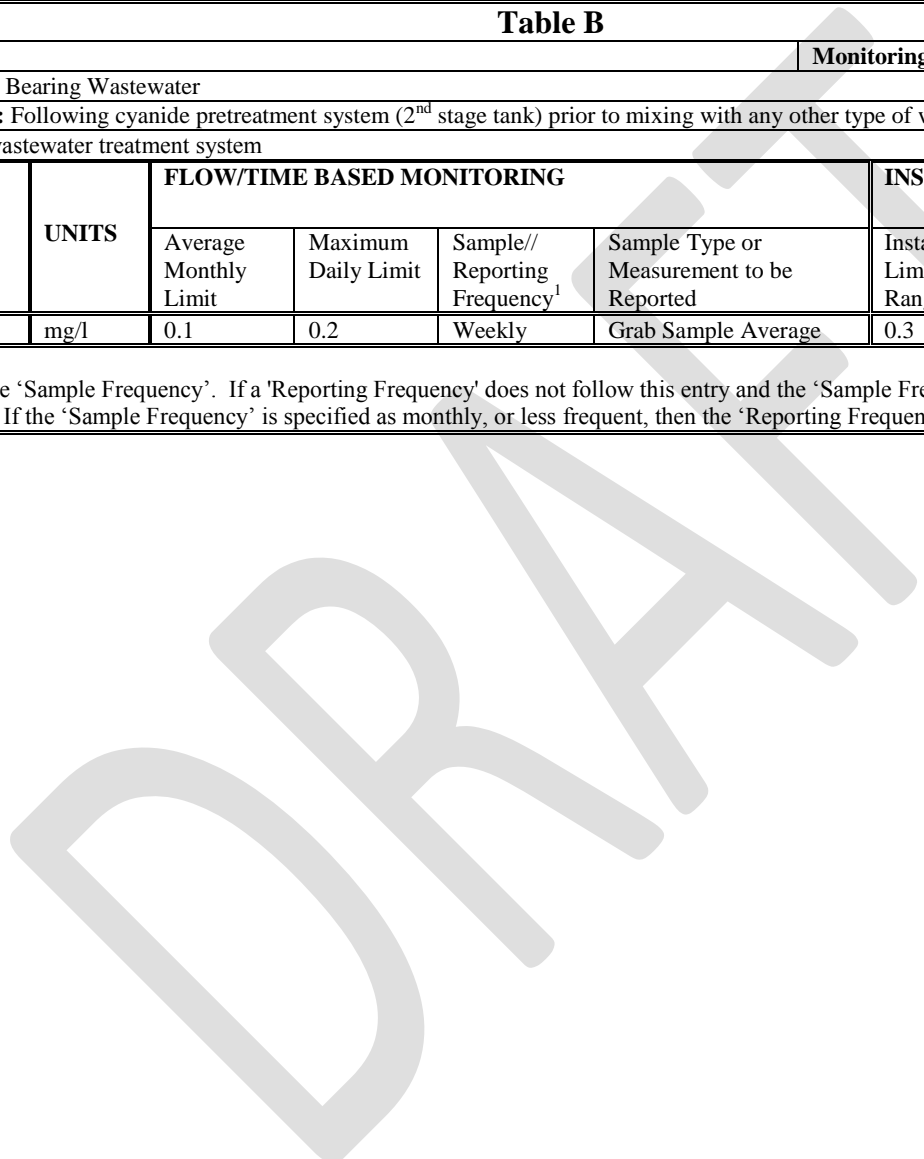
**Table A**

Discharge Serial Number: 201-1						Monitoring Location: 1		
Wastewater Description: Helicopter manufacturing and maintenance wastewaters								
Monitoring Location Description: Sampling valve following the sand filter								
Discharge is to: The town of Stratford Publicly Owned Treatment Works ("POTW") via its collection system								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported
Cadmium, Total	mg/l	0.1	0.5	Semi-Annually	Daily Composite	0.75	NR	Grab
Chromium, Hexavalent	mg/l	0.1	0.2	Weekly	Grab Sample Average	0.3	NR	Grab
Chromium, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
Copper, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
Cyanide, Amenable	mg/l	0.1	0.2	Weekly	Grab Sample Average	0.3	NR	Grab
Cyanide, Total	mg/l	0.65	1.2	Weekly	Grab Sample Average	1.8	NR	Grab
Flow Rate (Average Daily) <sup>1</sup>	gpd	----	NA	Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period <sup>1</sup>	gpd	NA	240,000	Monthly	Daily Flow	NA	NR	NA
Flow, Day of Sampling	gpd	NA	240,000	Weekly	Daily Flow	NA	NR	NA
Flow, Instantaneous	gpm	NA	NA	NR	NA	600	NR	Instantaneous
Lead	mg/l	0.1	0.5	Weekly	Daily Composite	0.75	NR	Grab
Nickel, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab
Oil Petroleum, Total Recoverable <sup>3</sup>	mg/l	NA	200	Semi-Annually	Grab Sample Average	200	NR	Grab
Organics, Total Toxic	mg/l	NA	NA	NR	NA	2.13	Weekly	Grab
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 to 10.0	Weekly	RDS
pH, Minimum	S.U.	NA	NA	NR	NA	6.0	Per Batch//Monthly	RDM
pH, Maximum	S.U.	NA	NA	NR	NA	10.0	Per Batch//Monthly	RDM
Silver, Total	mg/l	0.1	0.43	Weekly	Daily Composite	0.64	NR	Grab
Solids, Total Suspended	mg/l	NA	100.0	Weekly	Daily Composite	100.0	NR	Grab
Titanium, Total	mg/l	2.0	4.0	Weekly	Daily Composite	6.0	NR	Grab
Zinc, Total	mg/l	1.0	2.0	Weekly	Daily Composite	3.0	NR	Grab

**Table A Footnotes**  
<sup>1</sup> For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month.  
<sup>2</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.  
<sup>3</sup> Previously, oil petroleum, total recoverable, was generally referred to as oil and grease, hydrocarbon fraction.

**Table B**

<b>Discharge Serial Number:</b> 201-A					<b>Monitoring Location:</b> 1			
<b>Wastewater Description:</b> Cyanide Bearing Wastewater								
<b>Monitoring Location Description:</b> Following cyanide pretreatment system (2 <sup>nd</sup> stage tank) prior to mixing with any other type of wastewater								
<b>Discharge is to:</b> Sikorsky's main wastewater treatment system								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported
Cyanide, Amenable	mg/l	0.1	0.2	Weekly	Grab Sample Average	0.3	NR	Grab
<b>Table B Footnotes:</b> <sup>1</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.								



**Table C**

<b>Discharge Serial Number:</b> 202-1					<b>Monitoring Location:</b> 1			
<b>Wastewater Description:</b> Helicopter manufacturing and maintenance wastewater								
<b>Monitoring Location Description:</b> See Remarks								
<b>Discharge is to:</b> The town of Stratford POTW via its collection system								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>2</sup>	Sample Type or Measurement to be Reported
Flow Rate (Average Daily) <sup>1</sup>	gpd	----	NA	Monthly	Daily Flow	NA	NR	NA
Flow, Maximum during 24 hr period <sup>1</sup>	gpd	NA	250,000	Monthly	Daily Flow	NA	NR	NA
<b>Table C Footnotes and Remarks:</b>								
<b>Footnotes:</b>								
<sup>1</sup> For this parameter the Permittee shall maintain at the facility a record of the Total Daily Flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month.								
<sup>2</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.								
<b>Remarks:</b>								
1 Flow shall be measured by combining the daily flow recorded at the sanitary sewage lift station meter, the average daily flow from the Engineering Building (as determined from the building's flow meter and recorded weekly) and estimated miscellaneous building flows, including the industrial wastewater flow from the transmission test and advanced drive building cooling tower and its associated water treatment wastewater. The Permittee shall subtract an estimate of the amount of domestic sewage from the total. The amount of domestic sewage shall be calculated based on the number of employees (based on quarterly data from Sikorsky Aircraft Corporation's Human Resources Department) multiplied by fifteen (15) gallons per person per day.								



**Table D**

<b>Discharge Serial Number:</b> 202-A						<b>Monitoring Location:</b> 1		
<b>Wastewater Description:</b> Metal finishing wastewater								
<b>Monitoring Location Description:</b> See Footnote 2								
<b>Discharge is to:</b> The town of Stratford POTW via its collection system								
PARAMETER	UNITS	FLOW BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported
Cadmium, Total	mg/l	0.1	0.5	Quarterly	Grab <sup>2</sup>	0.5	Quarterly	Grab <sup>2</sup>
Chemical Oxygen Demand	mg/l	----	NA	Quarterly	Grab <sup>2</sup>	----	Quarterly	Grab <sup>2</sup>
Chromium, Hexavalent	mg/l	0.1	0.2	Quarterly	Grab <sup>2</sup>	0.2	Quarterly	Grab <sup>2</sup>
Chromium, Total	mg/l	1.0	2.0	Quarterly	Grab <sup>2</sup>	2.0	Quarterly	Grab <sup>2</sup>
Copper, Total	mg/l	1.0	2.0	Quarterly	Grab <sup>2</sup>	2.0	Quarterly	Grab <sup>2</sup>
Cyanide, Amenable	mg/l	0.1	0.2	Quarterly	Grab <sup>2</sup>	0.2	Quarterly	Grab <sup>2</sup>
Cyanide, Total	mg/l	0.65	1.2	Quarterly	Grab <sup>2</sup>	1.2	Quarterly	Grab <sup>2</sup>
Flow, Day of Sampling	gpd	NA	----	Quarterly	Daily Flow <sup>3</sup>	NA	NR	NA
Lead	mg/l	0.1	0.5	Quarterly	Grab <sup>2</sup>	0.5	Quarterly	Grab <sup>2</sup>
Nickel, Total	mg/l	1.0	2.0	Quarterly	Grab <sup>2</sup>	2.0	Quarterly	Grab <sup>2</sup>
Oil Petroleum, Total Recoverable <sup>4</sup>	mg/l	NA	200	Quarterly	Grab <sup>2</sup>	200	Quarterly	Grab <sup>2</sup>
Organics, Total Toxic	mg/l	NA	NA	NR	NA	2.13	Quarterly	Grab <sup>2</sup>
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 to 10.0	Quarterly	RDS
Silver, Total	mg/l	0.1	0.43	Quarterly	Grab <sup>2</sup>	0.43	Quarterly	Grab <sup>2</sup>
Solids, Total Suspended	mg/l	NA	100.0	Quarterly	Grab <sup>2</sup>	100.0	Quarterly	Grab <sup>2</sup>
Titanium, Total	mg/l	2.0	4.0	Quarterly	Grab <sup>2</sup>	4.0	Quarterly	Grab <sup>2</sup>
Zinc, Total	mg/l	1.0	2.0	Quarterly	Grab <sup>2</sup>	2.0	Quarterly	Grab <sup>2</sup>
<b>Table D Footnotes and Remarks:</b>								
<b>Footnotes:</b>								
<sup>1</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.								
<sup>2</sup> A copy of Attachment A of this permit shall be prepared for each sampling month. The Permittee shall collect a grab sample from each source comprising greater than two percent (>2%) of the estimated flow of the 202-A discharge during the sampling day. The Permittee shall analyze each grab sample individually. The flow-weighted arithmetic average concentration of the grab samples, based on the estimated flows reported on Attachment A prepared for the sampling period, shall be used to calculate the average monthly and maximum daily concentrations of the discharge for that sampling month's DMR. The Permittee shall also report the maximum instantaneous concentration for each parameter from all of the grab samples.								
<sup>3</sup> Flow shall be estimated on the day of sampling and documented on Attachment A.								
<sup>4</sup> Previously, oil petroleum, total recoverable, was generally referred to as oil and grease, hydrocarbon fraction.								
<b>Remarks:</b>								
1 Any violation of a maximum instantaneous limit must be reported on an attachment to the DMR.								

**Table E**

<b>Discharge Serial Number:</b> 202-B					<b>Monitoring Location:</b> 1			
<b>Wastewater Description:</b> Miscellaneous wastewater								
<b>Monitoring Location Description:</b> see Footnote 2								
<b>Discharge is to:</b> The Town of Stratford POTW via its collection system								
PARAMETER	UNITS	FLOW BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported
Chemical Oxygen Demand	mg/l	----	NA	Quarterly	Grab <sup>2</sup>	----	Quarterly	Grab <sup>2</sup>
Copper, Total	mg/l	1.0	2.0	Quarterly	Grab <sup>2</sup>	2.0	Quarterly	Grab <sup>2</sup>
Flow, Day of Sampling	gpd	NA	----	Quarterly	Daily Flow <sup>3</sup>	NA	NR	NA
Lead	mg/l	0.1	0.5	Quarterly	Grab <sup>2</sup>	0.5	Quarterly	Grab <sup>2</sup>
Oil Petroleum, Total Recoverable <sup>4</sup>	mg/l	NA	200	Quarterly	Grab <sup>2</sup>	200	Quarterly	Grab <sup>2</sup>
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 to 10.0	Quarterly	RDS
Solids, Total Suspended	mg/l	----	100	Quarterly	Grab <sup>2</sup>	100.0	Quarterly	Grab <sup>2</sup>
Zinc, Total	mg/l	1.0	2.0	Quarterly	Grab <sup>2</sup>	2.0	Quarterly	Grab <sup>2</sup>
<b>Table E Footnotes and Remarks:</b>								
<b>Footnotes:</b>								
<sup>1</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.								
<sup>2</sup> A copy of Attachment A of this permit shall be prepared for each sampling month. The Permittee shall collect a grab sample from each source comprising greater than two percent (>2%) of the estimated flow of the 202-B discharge during the sampling day. The Permittee shall analyze each grab sample individually. The flow-weighted arithmetic average concentration of the grab samples, based on the estimated flows reported on Attachment A prepared for the sampling period, shall be used to calculate the average monthly and maximum daily concentrations of the discharge for that sampling month's DMR. The Permittee shall also report the maximum instantaneous concentration for each parameter from all of the grab samples.								
<sup>3</sup> Flow shall be estimated on the day of sampling and documented on Attachment A.								
<sup>4</sup> Previously, oil petroleum, total recoverable, was generally referred to as oil and grease, hydrocarbon faction.								
<b>Remarks:</b>								
1 Any violation of a maximum instantaneous limit must be reported on an attachment to the DMR.								

**Table F**

<b>Discharge Serial Number:</b> 202-C						<b>Monitoring Location:</b> 1		
<b>Wastewater Description:</b> Water treatment wastewater								
<b>Monitoring Location Description:</b> See Footnote 2								
<b>Discharge is to:</b> The town of Stratford POTW via its collection system								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency <sup>1</sup>	Sample Type or measurement to be reported
Aluminum, Total	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
Chemical Oxygen Demand	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
Copper, Total	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
Flow, Day of Sampling	gpd	NA	----	Semi-Annually	Daily Flow <sup>3</sup>	NA	NR	NA
Lead	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.0 to 11.0	Semi-Annually	RDS
Solids, Total Suspended	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
Zinc, Total	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
<b>Table F Footnotes and Remarks:</b>								
<b>Footnotes:</b>								
<sup>1</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.								
<sup>2</sup> A copy of Attachment A of this permit shall be prepared for each sampling month. The Permittee shall collect grab samples from each source comprising greater than two percent (>2%) of the estimated flow of the 202-C discharge during the sampling day. The Permittee shall then analyze each grab sample individually and report the maximum concentration of each parameter.								
<sup>3</sup> Flow shall be estimated on the day of sampling and documented on Attachment A.								
<b>Remarks:</b>								
1 Any violation of a maximum instantaneous limit must be reported on an attachment to the DMR.								

**Table G**

<b>Discharge Serial Number:</b> 202-D						<b>Monitoring Location:</b> 1		
<b>Wastewater Description:</b> Non-contact cooling water								
<b>Monitoring Location Description:</b> See Footnote 2								
<b>Discharge is to:</b> The town of Stratford POTW via its collection system								
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported
Copper, Total	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
Flow, Day of Sampling	gpd	NA	----	Semi-Annually	Daily Flow <sup>3</sup>	NA	NR	NA
Lead	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
pH, Day of Sampling	S.U.	NA	NA	NR	NA	5.5 to 10.0	Semi-Annually	RDS
Solids, Total Suspended	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
Zinc, Total	mg/l	NA	NA	NR	NA	----	Semi-Annually	Grab <sup>2</sup>
<b>Table G Footnotes and Remarks:</b>								
<b>Footnotes:</b>								
<sup>1</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.								
<sup>2</sup> A copy of Attachment A of this permit shall be prepared for each sampling month. The Permittee shall collect grab samples from each source comprising greater than two percent (>2%) of the estimated flow of the 202-D discharge during the sampling day. The Permittee shall then analyze each grab sample individually and report the maximum concentration of each parameter.								
<sup>3</sup> Flow shall be estimated on the day of sampling and documented on Attachment A.								
<b>Remarks:</b>								
1 Any violation of a maximum instantaneous limit must be reported on an attachment to the DMR.								

**Table H**

<b>Discharge Serial Number:</b> 202-E	<b>Monitoring Location:</b> 1
<b>Wastewater Description:</b> Boiler blowdown	
<b>Monitoring Location Description:</b> See Footnote 2	
<b>Discharge is to:</b> The town of Stratford POTW via its collection system	

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING		
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported	Instantaneous Limit or Required Range	Sample// Reporting Frequency <sup>1</sup>	Sample Type or Measurement to be Reported
Copper, Total	mg/l	NA	NA	NR	NA	----	Annually	Grab <sup>2</sup>
Flow, Day of Sampling	gpd	NA	----	Annually	Daily Flow <sup>3</sup>	NA	NR	NA
Lead	mg/l	NA	NA	NR	NA	----	Annually	Grab <sup>2</sup>
pH, Day of Sampling	S.U.	NA	NA	NR	NA	6.0 to 12.0	Annually	RDS
Solids, Total Suspended	mg/l	NA	NA	NR	NA	----	Annually	Grab <sup>2</sup>
Zinc, Total	mg/l	NA	NA	NR	NA	----	Annually	Grab <sup>2</sup>

**Table H Footnotes and Remarks:**

**Footnotes:**

<sup>1</sup> The first entry in this column is the 'Sample Frequency'. If a 'Reporting Frequency' does not follow this entry and the 'Sample Frequency' is more frequent than monthly, then the 'Reporting Frequency' is monthly. If the 'Sample Frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.

<sup>2</sup> A copy of Attachment A of this permit shall be prepared for each sampling month. The Permittee shall collect grab samples from each source comprising greater than two percent (>2%) of the estimated flow of the 202-E discharge during the sampling day. The Permittee shall then analyze each grab sample individually and report the maximum concentration of each parameter.

<sup>3</sup> Flow shall be estimated on the day of sampling and documented on Attachment A.

**Remarks:**

1 Any violation of a maximum instantaneous limit must be reported on an attachment to the DMR.

- (B) All samples shall be comprised of only those wastewaters described in this schedule. Therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by the Department of Energy and Environmental Protection personnel, the Permittee, or other parties.

#### SECTION 5: SAMPLE COLLECTION, HANDLING AND ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall be performed using the methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40 CFR 136.4 or as provided in section 22a-430-3(j)(7) of the RCSA. Chemicals which do not have methods of analysis defined in 40 CFR 136 shall be analyzed in accordance with methods specified in this permit.
- (B) All metals analyses identified in this permit shall refer to analyses for total recoverable metal as defined in 40 CFR 136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the DMR provided by this office, and reported to the Water Permitting and Enforcement Division at the address below. Except for continuous monitoring, any monitoring required more frequently than monthly shall be reported on an attachment to the DMR, and any additional monitoring conducted in accordance with 40 CFR 136 or other methods approved by the Commissioner shall also be included on the DMR, or as an attachment, if necessary. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at the address below by the last day of the month following the month in which samples are taken.

Water Permitting and Enforcement Division (Attn: DMR Processing)  
Bureau of Materials Management and Compliance Assurance  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g., monthly, quarterly) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g., per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.
- (E) NetDMR Reporting Requirements
  1. Prior to one-hundred and eighty (180) days after the issuance of this permit, the Permittee may either submit monitoring data and other reports to the Department in hard copy form or electronically using NetDMR, a web-based tool that allows Permittees to electronically submit DMRs and other required reports through a secure internet connection. Unless otherwise approved in writing by the Commissioner, no later than one-hundred and eighty (180) days after the issuance of this permit, the Permittee shall begin reporting electronically using NetDMR. Specific requirements regarding subscription to NetDMR, and submittal of data and reports in hard copy form and for submittal using NetDMR are described below:

- a. Submittal of *NetDMR Subscriber Agreement*

On or before fifteen (15) days after the issuance of this permit, the Permittee and/or the person authorized to sign the Permittee's DMRs ("Signatory Authority") as described in section 22a-430-3(b)(2) of the RCSA shall contact the Department at [deep.netdmr@ct.gov](mailto:deep.netdmr@ct.gov) and initiate the NetDMR subscription process for electronic submission of DMR information. Information on NetDMR is available on the Department's website at [www.ct.gov/deep/netdmr](http://www.ct.gov/deep/netdmr). On or before ninety (90) days after issuance of this permit, the Permittee shall submit a signed and notarized copy of the *Connecticut DEEP NetDMR Subscriber Agreement* to the Department.

b. Submittal of Reports Using NetDMR

Unless otherwise approved by the Commissioner, on or before one-hundred and eighty (180) days after issuance of this permit, the Permittee and/or the Signatory Authority shall begin electronically submitting DMRs and reports required under this permit to the Department using NetDMR in satisfaction of the DMR submission requirement of Section 5(C) of this permit.

DMRs shall be submitted electronically to the Department no later than the thirtieth (30<sup>th</sup>) day of the month following the completed reporting period. All reports required under the permit, including any monitoring conducted more frequently than monthly or any additional monitoring conducted in accordance with 40 CFR 136, shall be submitted to the Department as an electronic attachment to the DMR in NetDMR. Once a Permittee begins submitting reports using NetDMR, it will no longer be required to submit hard copies of DMRs or other reports to the Department. The Permittee shall also electronically file any written report of non-compliance described in Section 6 of this permit as an attachment in NetDMR. NetDMR is accessed from: <http://www.epa.gov/netdmr>.

c. Submittal of NetDMR Opt-Out Requests

If the Permittee is able to demonstrate a reasonable basis, such as technical or administrative infeasibility, that precludes the use of NetDMR for electronically submitting DMRs and reports, the Commissioner may approve the submission of DMRs and other required reports in hard copy form (“opt-out request”). Opt-out requests must be submitted in writing to the Department for written approval on or before fifteen (15) days prior to the date the Permittee would be required under this permit to begin filing DMRs and other reports using NetDMR. This demonstration shall be valid for twelve (12) months from the date of the Department’s approval and shall thereupon expire. At such time, DMRs and reports shall be submitted electronically to the Department using NetDMR unless the Permittee submits a renewed opt-out request and such request is approved by the Department.

All opt-out requests and requests for the NetDMR subscriber form should be sent to the following address or by email at [deep.netdmr@ct.gov](mailto:deep.netdmr@ct.gov):

**Attn: NetDMR Coordinator**  
**Connecticut Department of Energy and Environmental Protection**  
**79 Elm Street**  
**Hartford, CT 06106-5127**

(F) Copies of all DMRs shall be submitted concurrently to the town of Stratford POTW.

(G) For Total Toxic Organics (“TTO”) monitoring, in accordance with section 22a-430-4(l) of the RCSA and 40 CFR 433 (Metal Finishing Point Source Category), the Permittee may, in lieu of analyzing for TTO, include a statement on each DMR certifying compliance with its approved Solvent Management Plan. This certification statement shall be as follows:

*“Based on my inquiry of the person or persons responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report which required such certification. I further certify that this facility is implementing the solvent management plan approved by the Commissioner.”*

(H) The Permittee shall submit a completed Attachment A as part of each DMR submitted under this permit. The Attachment A must list all waste streams that contribute to each discharge during the sampling day and their estimated daily flow. The attachment shall also indicate which contributing waste streams were sampled to meet permit monitoring requirements.

**SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS**

(A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Water Permitting and Enforcement Division (Attn: DMR Processing) within thirty (30) days of the exceedance.

- (B) The Permittee shall immediately notify the Water Permitting and Enforcement Division and the Stratford POTW of all discharges that could cause problems to the Publicly Owned Treatment Works ("POTW"), including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the Permittee indicates a violation of limits specified in Section 4 of this permit, the Permittee shall notify the Water Permitting and Enforcement Division within twenty-four (24) hours of becoming aware of the violation.

## SECTION 7: COMPLIANCE CONDITIONS

In accordance with 40 CFR §403.8(f)(2)(viii), the Commissioner may provide public notification, in a newspaper of general circulation in the area of the respective POTW, of permittees that at any time in the previous twelve (12) months were in significant noncompliance with the provisions of this permit. For the purposes of this provision, a permittee that is a Significant Industrial User is in significant noncompliance if its violation(s) meet(s) one or more of the following criteria:

- **Chronic violations:** Those in which sixty-six percent (66%) or more of all measurements taken for the same pollutant parameter during a six (6) month period exceed, by any magnitude, the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s).
- **Technical Review Criteria violations:** Those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six-month period equal or exceed the Average Monthly, Maximum Daily, or Maximum Instantaneous Limit(s) multiplied by 1.4 for biochemical oxygen demand, total suspended solids or fats, oil, and grease, or 1.2 for all other pollutants except pH.
- **Monitoring Reports:** Failure to provide, within forty-five (45) days after the due date, required reports such as DMRs.
- **Compliance Schedule:** Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in or linked to a respective permit for starting construction, completing construction or attaining final compliance.
- **Noncompliance Reporting:** Failure to accurately report noncompliance in accordance with provisions identified in Section 6 of this permit.
- **Discretionary:** Any other violation of an effluent limit that the Department determines has caused, alone or in combination with other discharges, a violation of the POTW's NPDES permit, inhibition or disruption of the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- **Imminent Endangerment:** Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment, or has resulted in the Department's exercise of its emergency authority under 40 CFR 403.8(f)(1)(vi)(B) to halt or prevent such a discharge.
- **Best Management Practices ("BMPs"):** Any other violation or group of violations, which may include a violation of BMPs, which the Department determines will adversely affect the operation or implementation of the pretreatment program.

This permit is hereby issued on

\_\_\_\_\_  
Macky McCleary  
Deputy Commissioner  
Department of Energy and Environmental Protection

MM/SCE

cc: Stratford POTW



## Attachment A

<b>Discharge #</b>	<b>Process Description</b>	<b>Estimation of Average Daily Flow (gpd)</b>	<b>% of Total Flow</b>	<b>Sampled*</b>
DSN 202-A	Miscellaneous Metal Finishing Wastewater			
DSN 202-B	Miscellaneous Wastewater			
DSN 202-C	Water Treatment Wastewaters			
DSN 202-D	Non-contact Cooling Water			
DSN 202-E	Boiler Blowdown			

- \* S - Process was sampled as part of required permit monitoring
- NR – Flow from the process was less than or equal to two percent (2%) of the discharge on the day of sampling (Not Required)
- NF - Process was not running on the day of sampling (No Flow)
- NS - Process wastewater, greater than two percent (2%) of the discharge, was not sampled as part of required permit monitoring (Note, an explanation must be submitted with the DMR.)

Flow estimates based on historic flow information.

# DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Sikorsky Aircraft Corporation

## PERMIT, ADDRESS, AND FACILITY DATA

Permit No. SP0000551

Application No. 201004466

Mailing Address:				Location Address:						
Street:	6900 Main Street			Street:	6900 Main Street					
City:	Stratford	ST:	CT	Zip:	06615-9129		City:	Stratford	ST:	CT
Contact Name:	Mark LeMoine			DMR Contact	Mark LeMoine					
Phone No.:	(203) 386 - 8794			Phone No.:	(203) 386 - 8794					
Email:	Mark.LeMoine@sikorsky.com			Email:	Mark.LeMoine@sikorsky.com					

## PERMIT INFORMATION

**DURATION** 5 YEAR  10 YEAR  30 YEAR

**TYPE** New  Reissuance  Modification

**CATEGORIZATION** POINT (X) NON-POINT ( ) GIS #

NPDES ( ) PRETREAT (X) GROUND WATER (UIC) ( ) GROUND WATER (OTHER) ( )

NPDES MAJOR (MA) \_\_\_\_\_

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI)

NPDES or PRETREATMENT MINOR (MI) \_\_\_\_\_

PRETREAT SIGNIFICANT INDUS USER (SIU)

PRETREAT CATEGORICAL (CIU)

POLLUTION PREVENTION MANDATE \_\_\_\_\_ ENVIRONMENTAL EQUITY ISSUE \_\_\_\_\_

## SOLVENT MANAGEMENT PLAN

Is the facility operating under an approved solvent management plan? YES  NO

Approved on:

NOTE – Sikorsky has submitted a new solvent management plan. There are some technical questions that must be addressed before the plan can be approved. The company has been notified that the new plan must be approved before the permit can be reissued (5/12/14 e-mail).

## COMPLIANCE ISSUES

COMPLIANCE SCHEDULE YES  NO

POLLUTION PREVENTION \_\_\_ TREATMENT REQUIREMENT \_\_\_ WATER CONSERVATION  
 WATER QUALITY REQUIREMENT \_\_\_ REMEDIATION \_\_\_ OTHER \_\_\_\_\_

IS THE PERMITTEE SUBJECT TO A PENDING ENFORCEMENT ACTION? NO X YES \_\_\_

**OWNERSHIP CODE**

Private X Federal \_\_\_ State \_\_\_ Municipal (town only) \_\_\_ Other \_\_\_

**DEEP STAFF ENGINEER:** Stephen Edwards

**PERMIT FEES**

DSN #	Discharge Code	Description	Annual Fee
201-1	501035Z	Metal Finishing	\$8,425.00
	501032	Laboratory Wastewater	\$660.00
	5170000	Blowdown from Heating and Cooling	\$4,337.50
202-1	5060000	Water Production Wastewater	\$660.00
	502000a	Non-Contact Cooling Water	\$660.00
	501035Z	Metal Finishing	NA
	501032	Laboratory Wastewater	NA
	5170000	Blowdown from Heating and Cooling	NA
		Total Annual Fee	\$14,742.50

**FOR SEWER DISCHARGES**

The discharge is to the Town of Stratford POTW via its collection system.

**NATURE OF BUSINESS GENERATING DISCHARGE**

Sikorsky Aircraft Corporation manufactures helicopter parts and helicopters.

**PROCESS AND TREATMENT DESCRIPTION (by DSN)**

DSN 201-1 consists of up to 240,000 gpd of helicopter manufacturing and maintenance wastewaters. Specifically, the discharge consists of wastewater from metal finishing processes, stormwater from secondary containment systems, steam condensate, pump seal water, air scrubber wastewater, container washout water, laboratory wastewater, battery wash water and floor wash water. Metal finishing processes consist of non-destruct testing wastewater (formerly DSNs 002 & 005), electro finishing (electroplating, stainless steel passivation and magnesium coating application), surface coating application, alodine-chrome conversion coating of aluminum, removal technologies (metal stripping, abrasive blasting, deburring and metal etching) and alkaline cleaning. Paint is removed from coating wastewater by means of gravity separation in reservoirs. All wastewater is batch treated. Cyanide oxidation and chrome reduction are performed as necessary. Metals are precipitated through the addition of a coagulant. The wastewater then goes through pH adjustment and flocculation and passes through a sand filter prior to discharge. Sludge that settles in the batch treatment tanks is pumped to a sludge thickening tank, then is dewatered in a filter press. This discharge was previously DSN 002 of NPDES permit CT0001716. The discharge was relocated to the sanitary sewer in 2005.

The Permittee utilizes a cellular based manufacturing system. The facility will be moving many of its processes within the facility and replacing many pieces of older equipment with new equipment during the life of this permit. Therefore, DSNs 202-A through 202-E represent categories of wastewater, rather than actual discharge pipes. Specific discharge locations within the plant have not been designated for these wastewaters.

DSN 202-A consists of metal finishing wastewater. This discharge consists of vehicle wash/leak test wastewater (formerly DSNs 016 & 017), glycol quench rinses (formerly DSN 006), and electrolytic rinses. Wastewater from the individual processes that contribute to this discharge were sampled and analyzed. The data from these samples indicated that, with the exception of the glycol quench rinses, these waste streams meet permitted limits without treatment. The glycol quench rinses pass through a carbon filter prior to discharge. Note: DSN 202-A previously included wastewaters from alkaline rinse tanks and nondestructive testing rinse waters. Since the issuance of the previous permit, the alkaline rinse tanks were eliminated and the nondestructive testing rinse waters were redirected to DSN 201-1.

DSN 202-B contains miscellaneous wastewater. Specifically, the discharge consists of ultra filtration regeneration wastewater (formerly DSN 010), evaporator distillates (formerly DSN 004), wastewater from laboratories, pump seal water, blow downs and condensates. Note: Fire suppression system wastewater previously discharged through DSN 202-B. At Sikorsky's request, this wastewater is now regulated under the Department's General Permit for the Miscellaneous Discharges of Sewer Compatible Wastewater; registration is not required for authorization to discharge this wastewater under the General Permit.

DSN 202-C consists of water treatment wastewater from regenerating, back-washing or blowdown from various water filter and softener systems (including former DSNs 012 & 018). The filters are used to treat water for industrial use.

DSN 202-D is made-up of once-through non-contact cooling water and cooling tower blowdown (including former DSNs 09 & 015).

DSN 202-E consists of boiler blowdown (including former DSNs 011 & 013).

The discharges are directed to the Town of Stratford POTW via its collection system.

#### **RESOURCES USED TO DRAFT PERMIT**

- |                                     |  |                                  |
|-------------------------------------|--|----------------------------------|
| <input checked="" type="checkbox"/> | Federal Effluent Limitation Guideline      | <u>40CFR 433 Metal Finishing</u> |
|                                     |  | name of category                 |
| <input type="checkbox"/>            | Performance Standards                      |                                  |
| <input type="checkbox"/>            | Federal Development Document               |                                  |
| <input type="checkbox"/>            | Treatability Manual                        |                                  |
| <input checked="" type="checkbox"/> | Department File Information                |                                  |
| <input type="checkbox"/>            | Connecticut Water Quality Standards        |                                  |
| <input type="checkbox"/>            | Anti-degradation Policy                    |                                  |
| <input type="checkbox"/>            | Coastal Management Consistency Review Form |                                  |
| <input type="checkbox"/>            | Other – Metal Finishing Guidance Document  |                                  |

#### **BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS**

- 40 CFR 433.15 Pretreatment Standards for Existing Sources (PSES)  
DSN 201-1 - organics (total toxic) - MIL; silver - MDL  
DSN 202-A - organics (total toxic) - MIL; silver - MDL
- Case-by-Case Determination (See Other Comments)

DSN 201-1 - oil petroleum (total recoverable), and solids (total suspended) – MDL, MIL; titanium – AML, MDL, MIL; pH; cyanide (total) and silver - MIL  
DSN 202-A - oil petroleum (total recoverable) and solids (total suspended) – MDL, MIL; titanium– AML, MDL, MIL; pH; cadmium, chromium (hexavalent and total), copper, cyanide (amenable and total), lead, nickel, silver and zinc - MIL  
DSN 202-B - copper, lead, and zinc– AML, MDL, MIL; oil petroleum (total recoverable), and solids (total suspended) – MDL, MIL; ph  
DSN 202-C - pH  
DSN 202-D - pH  
DSN 202-E - pH

- Section 22a-430-4(s) of the Regulations of Connecticut State Agencies (“RCSA”)  
DSN 201-1 - cadmium, chromium (hexavalent and total), copper, cyanide (amenable and total), lead, nickel, and zinc – AML, MDL, MIL; silver – AML, MIL  
DSN 201-A - cyanide (amenable) – AML, MDL, MIL;  
DSN 202-A - cadmium, chromium (hexavalent and total), copper, cyanide (amenable and total), lead, nickel, and zinc – AML, MDL; silver – AML, MIL

AML: Average Monthly Limit; MDL: Maximum Daily Limit, MIL; Maximum Instantaneous Limit

Note: The previous permit included limits and monitoring requirements for oil and grease (hydrocarbon fraction), which is now identified as oil petroleum (total recoverable).

## GENERAL COMMENTS

As applicable, EPA Metal Finishing Categorical limits (40CFR 433) were compared to Section 22a-430-4(s)(2) of the RCSA limits. The more stringent limits were incorporated into the permit.

## OTHER COMMENTS

Sikorsky initiated its metal finishing discharge to the Housatonic River in 1956. This discharge was relocated to the Stratford sanitary sewer system in 2005. For permitting purposes, the discharge was regulated as an “existing source” in accordance with section 22a 430-4(1)(4)(D)(i) of the RCSA.

The limits for oil petroleum (total recoverable), pH, solids (total suspended) and titanium contained in this permit are consistent with limits in other permits for similar discharges and are the limits contained in the previous permit.

In accordance with section 22a-430-4(s) of the RCSA, the AML and MDL for total cyanide in Tables A and D (DSNs 201-1 and 202-A) were reduced from 1.0 mg/l and 2.0 mg/l to 0.65 mg/l and 1.2 mg/l, respectively. The MIL for DSN 201-1 (previously 3.0 mg/l, now 1.8 mg/l) was recalculated by multiplying the MDL by 1.5. This is consistent with the method used to develop MDLs in section 22a-430-4(s) of the RCSA and other permits for similar discharges. See the next paragraph for the MIL calculation for DSN 202-A.

When the permit as reissued in 2005, the individual process waste streams that contribute to DSN 202-1 were sampled and analyzed for known and suspected pollutants. It was determined that pollutant concentrations in the wastewaters from these processes can meet permit limits without treatment. Since the sub-discharges (DSNs 202-A through 202-E) that comprise DSN 202-1 represent categories of discharges rather than discharge points, compliance with permit limits is assessed by collecting grab samples from each source contributing greater than 2% of the flow of a sub-discharge on a sampling day. Each sample is analyzed and the results are arithmetic averaged proportionally to the estimated flows. To ensure that pollutant concentrations in individual waste streams continue

to meet limits without treatment, the MILs for these discharges are the same as the MDLs, as was done in the previous permit.

A case-by-case determination was made to apply limits from section 22a-430-4(s) of the RCSA to copper, lead and zinc in DSN 202-B. This is consistent with the limits in other permits for similar discharges and are the limits contained in the previous permit.

A case-by-case determination was made that the following parameters are present in the discharges at sufficient concentrations to warrant regular monitoring.

DSN 202-A - chemical oxygen demand

DSN 202-B - chemical oxygen demand

DSN 202-C - aluminum, chemical oxygen demand, copper, lead, solids (total suspended) and zinc

DSN 202-D - copper, lead, solids (total suspended) and zinc

DSN 202-E - copper, lead, solids (total suspended) and zinc

The flow measured for DSN 202-1 will not include the discharge from the transmission and advance drive testing cooling tower and associated water treatment wastewater. A conservative estimate of the flow rate from the tower is 3,000 gpd and from the filter for the wastewater is 300 gpd. These flow rates will be added to the flow rate actually measured for DSN 202-1.

The MIL for silver in DSN 201 (Table A) was reduced from 0.75 mg/l to 0.64 mg/l. The new MIL was calculated by multiplying the MDL by 1.5 (0.43 X 1.5).

**NOTICE OF TENTATIVE DECISION OF  
INTENT TO RENEW A STATE PERMIT  
FOR THE FOLLOWING DISCHARGES INTO  
THE WATERS OF THE STATE OF CONNECTICUT**

**TENTATIVE DECISION**

The Commissioner of Energy and Environmental Protection (“the Commissioner”) hereby gives notice of a tentative decision to renew a permit based on an application submitted by **Sikorsky Aircraft Corporation** (“the applicant”) under section 22a-430 of the Connecticut General Statutes (“CGS”) for a permit to discharge into the waters of the state.

In accordance with applicable federal and state law, the Commissioner has made a tentative decision that continuance of the existing system to treat DSN 201 would protect the waters of the state from pollution. The Commissioner has also made a tentative decision that continuance of the existing discharges, to be designated as DSN 202, would not cause pollution of the waters of the state. The Commissioner proposes to renew a permit for the discharges to the town of Stratford Publicly Owned Treatment Works (“POTW”).

The proposed permit, if issued by the Commissioner, will require that DSN 201 wastewater be treated to meet the applicable effluent limitations, and will require periodic monitoring to demonstrate that the discharge will not cause pollution.

**APPLICANT'S PROPOSAL**

Sikorsky Aircraft Corporation proposes to continue discharging up to 490,000 gallons per day of helicopter manufacturing and maintenance wastewater to the Stratford POTW.

The name and mailing address of the permit applicant are: Sikorsky Aircraft Corporation, 6900 Main Street, Stratford, Connecticut 06615-9129.

The activity takes place at: Sikorsky Aircraft Corporation, 6900 Main Street, Stratford, Connecticut.

The proposed activity is within the coastal area as defined in section 22a-94 of the CGS. Pursuant section 22a-98 of the CGS, the applicant must demonstrate that the activities are consistent with all applicable goals and policies in section 22a-92 of the CGS, and that such activities incorporate all reasonable measures mitigating any adverse impacts on coastal resources and future water-dependent development activities.

## **REGULATORY CONDITIONS**

### **Type of Treatment**

DSN 201 – Cyanide-bearing wastewater is pretreated prior to being discharged to Sikorsky’s main wastewater treatment system. Paint is removed from coating wastewater by means of gravity separation in reservoirs. The entire discharge is then batch treated (cyanide oxidation, chrome reduction, pH adjustment, flocculation, solids settling, sludge dewatering) and passes through a sand filter prior to discharge.

DSN 202 - Based on analytical data, this discharge will not cause pollution of the waters of the state and therefore does not require treatment.

### **Effluent Limitations**

This permit contains effluent limitations consistent with Case-by-Case Determination using the criteria of Best Professional Judgment, the Federal Pretreatment Standards for Existing Sources (“PSES”) and section 22a-430-4(s) of the Regulations of Connecticut State (“RCSA”).

In accordance with section 22a-430-4(l) of the RCSA, the permit contains effluent limitations for the following types of toxic substances: heavy metals, cyanides and volatile organic compounds.

This permit contains effluent limitations on internal waste streams.

## **COMMISSIONER'S AUTHORITY**

The Commissioner is authorized to approve or deny such permits pursuant to section 22a-430 of the CGS and the Water Discharge Permit Regulations (sections 22a-430-3 and 4 of the RCSA).

## **INFORMATION REQUESTS**

The application has been assigned the following numbers by the Department of Energy and Environmental Protection. Please use these numbers when corresponding with this office regarding this application.

APPLICATION NO. 201004466

PERMIT ID NO SP000551

Interested persons may obtain copies of the application from Mark LeMoine at Sikorsky Aircraft Corporation, 6900 Main Street, Stratford, Connecticut 06615-9129, (203) 386 - 8794.



The application is available for inspection by contacting Stephen Edwards 860-424-3018, at the Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127 from 8:30 - 4:30, Monday through Friday.

Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

### **PUBLIC COMMENT**

Prior to making a final decision to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within thirty (30) days of this public notice. Written comments should be directed to Stephen Edwards, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby, and shall hold a hearing upon receipt of a petition signed by at least twenty-five (25) persons. Notice of any public hearing shall be published at least thirty (30) days prior to the hearing.

Petitions for a hearing should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. Original petitions must be *mailed or delivered* to: DEEP Office of Adjudications, 79 Elm Street, 3<sup>rd</sup> floor, Hartford, CT, 06106-5127. Petitions cannot be sent by fax or email. Additional information can be found at [www.ct.gov/deep/adjudications](http://www.ct.gov/deep/adjudications).

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action and Equal Opportunity Employer that is committed to complying with the Americans with Disabilities Act. To request an accommodation contact us at (860) 418-5910 or [deep.accommodations@ct.gov](mailto:deep.accommodations@ct.gov).

/s/Oswald Inglese, Jr. Director  
Water Permitting and Enforcement Division  
Bureau of Materials Management and Compliance Assurance

Dated: **05/30/2014**