

NPDES PERMIT MODIFICATION

issued to

Permittee:

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

Attention: Robert Araujo, Manager Environment, Health and Safety

Facility ID: 138-002

Permit ID: CT0001716

Receiving Stream: Housatonic River

Permit Modification Expires: September 25, 2011

This permit modification is issued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), section 22a-430-4(p)(5) of the Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, Section 402(b) of the Clean Water Act, as amended 33 USC 1251, *et. seq.*, and pursuant to an approval dated September 26, 1973, by the Administrator of the United States Environmental Protection Agency for the State of Connecticut to administer a N.P.D.E.S. permit program.

The Commissioner of Environmental Protection ("the Commissioner") has made a final determination on this permit modification and found that continuance of the existing discharge DSN 004 will not cause pollution of the waters of the state, and installation of a new system for DSN 003 and DSN 007 will protect the waters of the state from pollution. The Commissioner's decision is based on Application No. 200602790 for permit modification received on October 24, 2006 and the administrative record established in the processing of that application.

Sikorsky Aircraft Corporation, ("Permittee"), shall comply with all conditions of NPDES Permit No. CT0001716 issued on September 26, 2006 with the following modifications:

1. Tables B, C, and D, attached hereto, replace Tables B, C, and D of Section 5 of NPDES Permit No. CT0001716 as issued on September 26, 2006.
2. Section 9, attached hereto, replaces Section 9 of NPDES Permit No. CT0001716 as issued on September 26, 2006.

The Commissioner hereby authorizes the Permittee to discharge in accordance with the provisions of this permit modification, NPDES Permit No. CT0001716, the above referenced application, and all approvals issued by the Commissioner or the Commissioner's authorized agent for the discharges and/or activities authorized by, or associated with, this permit.

PERMIT # CT0001716

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 Clean Water Act or the Connecticut General Statutes or regulations adopted thereunder, as amended. The permit as modified under this paragraph may also contain any other requirements of the Clean Water Act or Connecticut General Statutes or regulations adopted thereunder which are then applicable.

TABLE B									
DISCHARGE SERIAL NUMBER: 003-1					MONITORING LOCATION: 1				
WASTEWATER DESCRIPTION: Non-Contact Cooling Water, Fire System Water, Ambient Air Condensate and Aircraft Spot Leak Test Water									
MONITORING LOCATION DESCRIPTION: At the end of the pipe as it enters the receiving stream.									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test ³
		Average Monthly Limit	Maximum Daily Limit	Sample//Reporting Frequency ²	Sample Type or Measurement to be Reported ⁴	Instantaneous Limit or Required Range	Sample//Reporting Frequency ²	Sample Type or Measurement to be Reported	
Aquatic Toxicity, Mysidopsis bahia NOAEL = 89% ⁶	%	NA	≥ 90%	Quarterly	Daily Composite	LC50 ≥ 89%	NR	Grab	
Aquatic Toxicity, Mysidopsis bahia Survival in 100% ⁶	%	NA	≥ 50%	Quarterly	Daily Composite	NA	NR	Grab	
Aquatic Toxicity, Cyprinodon variegates NOAEL = 89% ⁶	%	NA	≥ 90%	Quarterly	Daily Composite	LC50 ≥ 89%	NR	Grab	
Aquatic Toxicity, Cyprinodon variegates Survival in 100% ⁶	%	NA	≥ 50%	Quarterly	Daily Composite	NA	NR	Grab	
Aluminum, Total	ug/l	NA	----	Quarterly	Daily Composite	NA	NR	NA	
Ammonia, as Nitrogen	ug/l	NA	----	Quarterly	Daily Composite	NA	NR	NA	
Chlorine, Total Residual	ug/l	----	----	Quarterly	Grab Sample Average	NA	NR	NA	X
Chlorine, Total Residual ⁵	ug/l	45.8	91.9	Quarterly	Grab Sample Average	138	NR	NA	X
Copper, Total	ug/l	----	----	Quarterly	Daily Composite	NA	NR	NA	X
Copper, Total ⁵	ug/l	17.9	35.8	Quarterly	Daily Composite	53.7	NR	NA	X
Flow, Day of Sampling	gpd	NA	65,000	Quarterly	Daily Flow	NA	NR	NA	
Flow, Average & Maximum ¹	gpd	25,000	65,000	Daily/Monthly	See Remarks	NA	NR	NA	
Hours of Discharge	hr.	NA	----	Quarterly	Total Hours	NA	NR	NA	
Lead, Total	ug/l	49.5	99.3	Quarterly	Daily Composite	149	NR	NA	X
Iron, Total	ug/l	NA	----	Quarterly	Daily Composite	NA	NR	NA	

Oil and Grease, Total	ug/l	NA	5,000	Quarterly	Grab Sample Average	7,500	NR	NA	
pH	S.U.	NA	NA	NR	NA	6.0 - 9.0	Quarterly	RDS	
Solids, Total Suspended	ug/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Surfactants	ug/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Temperature	deg F	NA	NA	NR	NA	-----	Quarterly	Instantaneous	
Zinc, Total	ug/l	-----	672	Quarterly	Daily Composite	1,008	NR	NA	X
Zinc, Total ⁵	ug/l	335	672	Quarterly	Daily Composite	1,008	NR	NA	X

Table B Footnotes:

¹ 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 under dry weather conditions for each month. If dry weather conditions do not occur during a given week, an asterisk shall be entered on the Discharge Monitoring Report for that week with a footnote indicating that dry weather conditions did not occur.

² The first entry in this column is the `Sample Frequency`. If this entry is not followed by a `Reporting Frequency` and the `Sampling 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`.

³ Minimum Level Test refers to Section 6(A)(3) of this permit.

⁴ `Daily Composite`, for this discharge, shall mean a composite sample taken over a full operating day consisting of grab samples collected at equal intervals of up to four (4) hours and combined proportionally to flow, or a composite sample continuously collected over a full operating day proportionally to flow.

⁵ Effective 730 days from permit issuance.

⁶ Toxicity limits are in percent survival.

TABLE C									
DISCHARGE SERIAL NUMBER: 004-1					MONITORING LOCATION: 1				
WASTEWATER DESCRIPTION: Non-Contact Cooling Water, Fire System Water, Ambient Air Condensate and Spill Containment Stormwater									
MONITORING LOCATION DESCRIPTION: At the end of the pipe as it enters the receiving stream.									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test ³
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency ^{2 and 4}	Sample Type or Measurement to be Reported ⁵	Instantaneous Limit or Required Range	Sample// Reporting Frequency ^{2 and 4}	Sample Type or Measurement to be Reported	
Aquatic Toxicity, Daphnia pulex NOAEL = 57% ⁶	%	NA	≥ 90%	Quarterly	Daily Composite	LC50 ≥ 57%	NR	NA	
Aquatic Toxicity, Daphnia pulex Survival in 100% ⁶	%	NA	≥ 50%	Quarterly	Daily Composite	NA	NR	NA	
Aquatic Toxicity, Pimephales promelas NOAEL = 57% ⁶	%	NA	≥ 90%	Quarterly	Daily Composite	LC50 ≥ 57%	NR	NA	
Aquatic Toxicity, Pimephales promelas Survival in 100% ⁶	%	NA	≥ 50%	Quarterly	Daily Composite	NA	NR	NA	
Aluminum, Total	ug/l	NA	----	Quarterly	Daily Composite	NA	NR	NA	
Chlorine, Total Residual	ug/l	106	213	Quarterly	Grab Sample Average	319	NR	NA	X
Copper, Total	ug/l	56	113	Quarterly	Daily Composite	169	NR	NA	X
Flow, Day of Sampling	gpd	NA	86,000	Quarterly	Daily Flow	NA	NR	NA	
Flow, Average & Maximum ¹	gpd	10,000	86,000	Continuous// Monthly	See Remarks	NA	NR	NA	
Hours of Discharge	hr.	NA	-----	Quarterly	Total Hours	NA	NR	NA	
Lead, Total	ug/l	11	23	Quarterly	Daily Composite	34	NR	NA	X
Iron, Total	ug/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Oil and Grease, Total	ug/l	NA	5,000	Quarterly	Grab Sample Average	7,500	NR	NA	
pH	S.U.	NA	NA	NR	NA	6.0 - 9.0	Quarterly	RDS	
Solids, Total Suspended	g/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Surfactants	ug/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Temperature	deg F	NA	NA	NR	NA	-----	Quarterly	Instantaneous	

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Zinc, Total	ug/l	1,000	2,000	Quarterly	Daily Composite	3,000	NR	NA	X
Table C Footnotes: ¹ 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 under dry weather conditions for each month. If dry weather conditions do not occur during a given week, an asterisk shall be entered on the Discharge Monitoring Report for that week with a footnote indicating that dry weather conditions did not occur. ² The first entry in this column is the `Sample Frequency`. If this entry is not followed by a `Reporting Frequency` and the `Sampling 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`. ³ Minimum Level Test refers to Section 6(A)(3) of this permit. ⁴ Samples shall be taken during dry weather conditions. ⁵ `Daily Composite`, for this discharge, shall mean a composite sample taken over a full operating day consisting of grab samples collected at equal intervals of up to four (4) hours and combined proportionally to flow, or a composite sample continuously collected over a full operating day proportionally to flow. ⁶ Toxicity limits are in percent survival.									

TABLE D									
DISCHARGE SERIAL NUMBER: 007-1					MONITORING LOCATION: 1				
WASTEWATER DESCRIPTION: Non-Contact Cooling Water, Fire System Water, Ambient Air Condensate, Ground Water and Spill Containment Stormwater									
MONITORING LOCATION DESCRIPTION: At the end of the pipe as it enters the receiving stream.									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test ³
		Average Monthly Limit	Maximum Daily Limit	Sample// Reporting Frequency ^{2 and 4}	Sample Type or Measurement to be Reported ⁵	Instantaneous Limit or Required Range	Sample// Reporting Frequency ^{2 and 4}	Sample Type or Measurement to be Reported	
Aquatic Toxicity, Daphnia pulex LC ₅₀ ⁷	%	NA	LC50 ≥ 66%	Quarterly	Daily Composite	LC50 ≥ 22 %	NR	NA	
Aquatic Toxicity, Pimephales promelas LC ₅₀ ⁷	%	NA	LC50 ≥ 66%	Quarterly	Daily Composite	LC50 ≥ 22%	NR	NA	
Aluminum, Total	ug/l	NA	----	Quarterly	Daily Composite	NA	NR	NA	
Chlorine, Total Residual	ug/l	----	----	Quarterly	Grab Sample Average	NA	NR	NA	X
Chlorine, Total Residual ⁶	ug/l	274	550	Quarterly	Grab Sample Average	825	NR	NA	X
Copper, Total	ug/l	146	293	Quarterly	Daily Composite	440	NR	NA	X
Flow, Total	gpd	NA	30,000	Quarterly	Daily Flow	NA	NR	NA	
Flow, Average & Maximum ¹	gpd	5,000	30,000	Daily/Monthly	See Remarks	NA	NR	NA	
Hours of Discharge	hr.	NA	-----	Quarterly	Total Hours	NA	NR	NA	
Lead, Total	ug/l	29.9	60.0	Quarterly	Daily Composite	90.0	NR	NA	X
Iron, Total	ug/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Oil and Grease, Total	ug/l	NA	5,000	Quarterly	Grab Sample Average	7,500	NR	NA	
pH	S.U.	NA	NA	NR	NA	6.0 - 9.0	Quarterly	RDS	
Solids, Total Suspended	g/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Surfactants	ug/l	NA	-----	Quarterly	Daily Composite	NA	NR	NA	
Temperature	deg F	NA	NA	NR	NA	-----	Quarterly	Instantaneous	
Zinc, Total	ug/l	985	1,980	Quarterly	Daily Composite	2,970	NR	NA	X

Table D Footnotes:

¹ 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 under dry weather conditions for each month. If dry weather conditions do not occur during a given week, an asterisk shall be entered on the Discharge Monitoring Report for that week with a footnote indicating that dry weather conditions did not occur.

² The first entry in this column is the `Sample Frequency`. If this entry is not followed by a `Reporting Frequency` and the `Sampling 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`.

³ Minimum Level Test refers to Section 6(A)(3) of this permit.

⁴ Samples shall be taken during dry weather conditions.

⁵ `Daily Composite`, for this discharge, shall mean a composite sample taken over a full operating day consisting of grab samples collected at equal intervals of up to four (4) hours and combined proportionally to flow, or a composite sample continuously collected over a full operating day proportionally to flow.

⁶ Effective 730 days from permit issuance.

⁷ Toxicity limits are in percent survival.

SECTION 9: COMPLIANCE SCHEDULE

- (A) The Permittee shall achieve compliance with the final total residual chlorine and total copper effluent limitations contained in Section 5 Table B and the total residual chlorine contained in Section 5 Table D as soon as possible but in no event later than 730 days after the date of issuance of this permit in accordance with the following:
- 1) The Permittee shall notify the Commissioner in writing of the identity of any consultants retained to prepare the documents and implement or oversee the actions required by this section of the permit. Permittee shall notify the Commissioner in writing within ten days after retaining any consultant other than one originally identified under this paragraph. The consultant retained to perform the studies and oversee any remedial measures required to achieve compliance with Section 5 limitations shall be a qualified professional engineer licensed to practice in Connecticut acceptable to the Commissioner. The Permittee shall submit to the Commissioner a description of a consultant's education, experience and training that is relevant to the work required by this permit within ten days after a request for such a description. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant unacceptable.
 - 2) On or before 365 days after the date of issuance of this permit, the Permittee shall submit for the Commissioner's review and written approval a comprehensive and thorough report which describes and evaluates alternative actions which may be taken by the Permittee to achieve compliance with the limitations in Section 5, Tables B and D, of this permit. Such report shall:
 - (a) evaluate alternative actions to achieve compliance with Section 5 limits including, but not limited to, pollutant source reduction, process changes/innovations, chemical substitutions, recycle and zero discharge systems, water conservation measures, and other internal and/or end-of-pipe treatment technologies;
 - (b) state in detail the most expeditious schedule for performing each alternative;
 - (c) list all permits and approvals required for each alternative, including but not limited to any permits required under sections 22a-32, 22a-42a, 22a-342, 22a-361, 22a-368 or 22a-430 of the Connecticut General Statutes;
 - (d) propose a preferred alternative or combination of alternatives with supporting justification; and
 - (e) propose a detailed program and schedule to perform all actions required by the preferred alternative including but not limited to a schedule for submission of engineering plans and specifications on any internal and/or end of pipe treatment facilities, start and completion of any construction activities related to any treatment facilities, and applying for and obtaining all permits and approvals required for such actions.
 - 3) The Permittee shall perform the approved actions in accordance with the approved schedule, but in no event shall the approved actions be completed later than 730 days after the date of issuance of this permit. Within fifteen days after completing such actions, the Permittee shall certify to the Commissioner in writing that the actions have been completed as approved.
- (B) The Permittee shall submit to the Commissioner semi-annual status reports beginning sixty days after the date of approval of the report referenced in Section 9(A)(2) above. Status reports shall include, but not be limited to, a summary of all effluent monitoring data collected by the Permittee during the previous 180 day period and a detailed description of progress made by the Permittee in performing actions required by this section of the permit in accordance with the approved schedule including, but not limited to, development of engineering plans and specifications, construction activity, contract bidding, operational changes, preparation and submittal of permit applications, and any other actions specified in the program approved pursuant to paragraph (A)(2) of this section.

- (C) The Permittee shall use best efforts to submit to the Commissioner all documents required by this section of the permit in a complete and approvable form. If the Commissioner notified the Permittee that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and the Permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty days of the Commissioner's notice of deficiencies. In approving any document or other action under this Compliance Schedule, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this section of the permit. Nothing in this paragraph shall excuse noncompliance or delay.
- (D) Dates. The date of submission to the Commissioner of any document required by this section of the permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this section of the permit, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" as used in this section of the permit means calendar day. Any document or action which is required by this section only of the permit, to be submitted, or performed, by a date which falls on, Saturday, Sunday, or, a Connecticut or federal holiday, shall be submitted or performed on or before the next day which is not a Saturday, Sunday, or Connecticut or federal holiday.
- (E) Notification of noncompliance. In the event that the Permittee becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this section of the permit or of any document required hereunder, the Permittee shall immediately notify the Commissioner and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. In so notifying the Commissioner, the Permittee shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved, and the Permittee shall comply with any dates that may be approved in writing by the Commissioner. Notification by the Permittee shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
- (F) Notice to Commissioner of changes. Within fifteen days of the date the Permittee becomes aware of a change in any information submitted to the Commissioner under this section of the permit, or that any such information was inaccurate or misleading or that any relevant information was omitted, the Permittee shall submit the correct or omitted information to the Commissioner.
- (G) Submission of documents. Any document, other than a discharge monitoring report, required to be submitted to the Commissioner under this section of the permit shall, unless otherwise specified in writing by the Commissioner, be directed to:

Stephen Edwards
Department of Environmental Protection
Bureau of Materials Management and Compliance Assurance
79 Elm Street
Hartford, CT 06106-5127

All other terms and conditions of NPDES Permit No. CT0001716 issued on September 26, 2006 shall continue in full force and effect.

This modification is hereby issued on 1/3/07.

/s/GINA MCCARTHY

Gina McCarthy

Commissioner

GM/SCE

NPDES Permit No. CT0001716

Sent RRR

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Sikorsky Aircraft Corporation

PAMS Company ID: 95029

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0001716

APPLICATION #: 200602790

FACILITY ID. 138-022

<u>Mailing Address:</u>					<u>Location Address:</u>						
Street:	6900 Main Street				Street:	6900 Main Street					
City:	Stratford	ST:	CT	Zip:	06615-9129	City:	Stratford	ST:	CT	Zip:	06615-9129
Contact Name:	Mary Chisarik				DMR Contact:	Erin Scinto					
Phone No.:	(203) 386 - 3423				Phone No.:	(203) 386 - 3763					

PERMIT INFORMATION

DURATION 5 YEAR X 10 YEAR ___ 30 YEAR ___

TYPE New ___ Reissuance ___ Modification X

CATEGORIZATION POINT (X) NON-POINT () GIS # 316

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

NPDES MAJOR (MA) ___

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) ___

NPDES or PRETREATMENT MINOR (MI) X

PRETREAT SIGNIFICANT INDUS USER (SIU) ___

PRETREAT CATEGORICAL (CIU) ___

Note: If it's a CIU then check off SIU

POLLUTION PREVENTION MANDATE ___ ENVIRONMENTAL EQUITY ISSUE ___

COMPLIANCE ISSUES

Compliance Schedule Yes X No ___

Pollution Prevention ___ Treatment Requirement ___ Water Conservation ___

Water Quality Requirement X Remediation ___ Other ___

Is The Permittee Subject To A Pending Enforcement Action? No X Yes ___

OWNERSHIP CODE

Private X Federal State Municipal (town only) Other public

DEP STAFF ENGINEER: Stephen Edwards

PERMIT FEES

Discharge Code	Category	DSN	Annual Fee
102000c	Non-Contact Cooling Water	001	\$14,700.00
1170000	Ambient Air Condensate	001	\$4,087.50
117000n	Fire System Wastewater	001	NA
1090000	Basement Dewatering	001	\$4,087.50
102000n	Non-Contact Cooling Water	003	NA
117000n	Ambient Air Condensate	003	NA
117000n	Fire System Wastewater	003	NA
121000a	Aircraft Spot Test Leak	003	\$525.00
102000n	Non-Contact Cooling Water	004	NA
117000n	Ambient Air Condensate	004	NA
117000n	Fire System Wastewater	004	NA
1080000	Spill Containment Stormwater	004	\$2,662.5
102000n	Non-Contact Cooling Water	007	NA
117000n	Ambient Air Condensate	007	NA
117000n	Fire System Wastewater	007	NA
109000n	Groundwater	007	NA
108000n	Spill Containment Stormwater	007	NA
		Total	\$26,062.50

This permit modification does not alter the permit's annual fees.

FOR NPDES DISCHARGES

DSNs 001 and 003: Unnamed tidal tributary to the Housatonic
Drainage basin Code: 6000 Present/Future Water Quality Standard: SC/SB

DSNs 004 and 007: Unnamed tidal tributary to the Far Mill River
Drainage basin Code: 6025 Present/Future Water Quality Standard: B

NATURE OF BUSINESS GENERATING DISCHARGE

Sikorsky Aircraft Corporation manufactures, assembles and maintains helicopters and their spare parts.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001 consists of non-contact cooling water, fire system water, ambient air condensate and basement dewatering ground water to an unnamed tributary of the Housatonic River. The discharge has an average monthly flow of 150,000 gpd and a maximum daily flow of 250,000 gpd. DSN 001 is dechlorinated to meet chlorine limits.

DSN 002 previously consisted of a maximum of 550,000 gpd of treated metal finishing wastewater to the same unnamed tributary of the Housatonic River that DSNs 001 and 003 discharge to. DSN 002 was relocated to the Stratford sanitary sewer as DSN 201 of Permit No. SP0000551 in December of 2005. *NLD (no longer discharging)*

DSN 003 is made up of an average monthly flow of 25,000 gpd with a maximum daily flow of 65,000 gpd of non-contact cooling water, fire system water, ambient air condensate and aircraft spot leak test water. DSN 003 is directed to the same unnamed tributary of the Housatonic River as DSN 001.

DSN 004 discharges to an unnamed tributary of the Far Mill River. It has an average monthly flow of 10,000 gpd with a maximum daily flow of 86,000 gpd of non-contact cooling water, fire system water, ambient air condensate and spill containment stormwater.

DSN 005 formally consisted of up to 20,000 gpd of non-contact cooling water. This discharge was eliminated when the permit was reissued on September 25, 2006. This discharge had been directed to the same unnamed tributary of the Far Mill River as DSNs 004, 006 and 007. *NLD*

DSN 006 previously discharged to the same unnamed tributary of the Far Mill River as DSNs 004, 005 and 007. It had consisted of up to 20,000 gpd of non-contact cooling water. This discharge was eliminated when the permit was reissued on September 25, 2006. *NLD*

DSN 007 consists of non-contact cooling water, fire system water, ambient air condensate, ground water and spill containment stormwater with an average monthly flow of 5,000 gpd and a maximum daily flow of 30,000 gpd to the same unnamed tributary of the Far Mill River as DSNs 004.

RESOURCES USED TO DRAFT PERMIT

- Federal Effluent Limitation Guideline _____
name of category
- Performance Standards
- Federal Development Document _____
name of category
- Treatability Manual
- Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy
- Coastal Management Consistency Review Form
- Other - Explain

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS CONTAINED IN THIS MODIFICATION

- Pretreatment Standards for Existing Sources (PSES)
- Pretreatment Standards for New Sources (PSNS)
- New Source Performance Standards (NSPS)
- Best Available Technology (BAT)
- Best Practicable Technology (BPT)
- Best Conventional Technology (BCT)
- Best Professional Judgment (See Other Comments)
- Secondary Treatment
- Case-by-Case Determination (See Other Comments)
 - DSN 003 - oil & grease and pH
 - DSN 004 - oil & grease, pH and zinc
 - DSN 007 - oil & grease and pH
- Section 22a-430-4(s) of the Regulations of Connecticut State Agencies
 - DSN 004 - zinc
- In order to meet in-stream water quality (See General Comments)
 - DSN 003 - aquatic toxicity, chlorine (total residual), copper, lead and zinc
 - DSN 004 - aquatic toxicity, chlorine (total residual), copper, and lead
 - DSN 007 - aquatic toxicity, chlorine (total residual), copper, lead, and zinc
- Anti-degradation policy (see Other Comments)

GENERAL COMMENTS

In 1995 DEP concluded that the unnamed tidal tributary to the Housatonic River that then received DSNs 001, 002 and 003 had inadequate flow to accommodate all three discharges. Therefore, when NPDES Permit No. CT00001716 was reissued on February 17, 2000, it included a four year schedule to relocate DSN 002 to the Housatonic River. In addition, though the unnamed tributary of the Far Mill River that received DSNs 004 through 007 was not similarly over taxed, it was believed that through the use of cooling towers, process water conservation measures and redirection of discharges to the sanitary sewer, the majority of DSN 003 and all of DSNs 004, 005,+- 006, and 007 could also be eliminated. Therefore, a schedule to eliminate these wastewaters was included in the permit when it was reissued.

However, on September 19, 2003, DEP received a written request from the Department of Transportation that construction activities to relocate DSN 002 be delayed to the spring of 2006 to avoid conflict with river navigation while DOT constructed a bridge across the Housatonic River for Route 15. Further, implementation of water conservation methods had not resulted in the expected elimination of DSNs 004 and 007.

In response to these developments, DEP issued Administrative Order WC 5415, signed by the Commissioner on December 9, 2004. The order required that DSN 002 be relocated to either the sanitary sewer or the Housatonic River on or before April 1, 2007. In addition, the order extended the schedule to eliminate DSNs 004 thru 007 and the non-contact cooling water portion of DSN003 to December 31, 2006, unless otherwise specified in NPDES Permit No. CT0001716.

In accordance with the order, Sikorsky Aircraft relocated DSN 002 to the Stratford sanitary sewer system as DSN 201 of State Permit No. SP0000551, reissued December 23, 2005. In addition, DSNs 005 and 006 were eliminated with the reissuance of NPDES Permit No. CT0001716 on September 26, 2006. The reissued NPDES permit also referenced the administrative order, requiring the elimination of the non-contact cooling water portion of DSN003 and DSNs 004 and 007 by December 31, 2006.

On October 3, 2006, Sikorsky Aircraft informed the Department that the remaining discharges could not be eliminated as simply as originally believed and therefore would not be eliminated by the December 2006 deadline. The water conservation measures implemented by Sikorsky Aircraft had reduced the permitted maximum flow of wastewater to the unnamed tributary of the Far Mill River from 188,000 gpd to 116,000 gpd and the maximum permitted flow to the unnamed tidal tributary of the Housatonic River from 1,648,000 gpd to 310,000 gpd. The Permittee indicated that they believe the cost of further elimination of wastewater sources would be disproportionate to the environmental gain.

Since the compliance steps had been originally included in NPDES Permit No. CT0001716 to encourage good water management practices, Staff determined that, though the discharges had not been eliminated, Sikorsky Aircraft had met the intent of the order by implementing good water conservation measures. Further, DMR and DEP sampling data indicates that DSNs 003, 004 and 007 are meeting aquatic toxicity limits. Hence, it was concluded that the permit should be modified to allow the discharges to continue. It is the Department's intent to issue Sikorsky Aircraft a Certificate of Compliance for Administrative Order WC 5415 after this permit modification is issued.

This modification eliminates the references to Administrated Order WC 5415 from Tables B, C and D of this permit, allowing for the continuance of DSNs 004 and 007 and the non-contact cooling water portion of DSN 003. The modification also includes a water quality-based chlorine limit for DSN 007, with a two-year schedule for the Permittee to meet the limit.