

# STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

**Pratt & Whitney**  
Middletown, Connecticut  
March 2026

Prepared for  
Pratt & Whitney  
One Aircraft Road  
Middletown, Connecticut 06457



**Loureiro Engineering Associates, Inc.**

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Comm. No. 068PE4.64

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## ACRONYMS

AST	Aboveground Storage Tank
BMPs	Best Management Practices
CAM	Corrective Action Measure
CFR	Code of Federal Regulations
COC	Chain of Custody
COD	Chemical Oxygen Demand
CT DEEP	Connecticut Department of Energy and Environmental Protection
Cu	Total Copper
DMR	Discharge Monitoring Report
DOT	Department of Transportation
ECM	Electrochemical Machining
EH&S	Environment, Health, & Safety
EPA	Environmental Protection Agency
FOIA	Freedom of Information Act
GP	National Pollutant Discharge Elimination System General Permit for the Discharge of Stormwater Associated with Industrial Activities
MOC	Management of Change
NAICS	North American Industry Classification System
ITA	Incident Tracking Analysis
NDDB	Natural Diversity Database
NO <sub>3</sub> -N	Nitrate as Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
O&G	Oil and Grease
OSHA	Occupational Safety and Health Administration
Pb	Lead
PFOS	Perfluorooctane sulfonate
PCBs	Polychlorinated Biphenyls
PE	Professional Engineer
PM	Preventive Maintenance
PPT	Pollution Prevention Team
SIC	Standard Industrial Classification
SWPPP	Stormwater Pollution Prevention Plan
TKN	Total Kjeldahl Nitrogen
TMDL	Total Maximum Daily Load
TP	Total Phosphorous
TSS	Total Suspended Solids
USGS	United States Geological Survey
Zn	Total Zinc

**Site Contact Information**

<b>Facility Operator(s):</b>
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Address: One Aircraft Road
City, State, Zip Code: Middletown, CT, 06457
Telephone Number: 860-781-4234
Email address: jared.scata@prattwhitney.com

<b>Facility Owners(s) if different than operator:</b>
Name: Same as above
Address: Same as above
City, State, Zip Code: Same as above
Telephone Number: Same as above
Email address: Same as above

<b>Site Contact if different than operator:</b>
Name: Jared Scata
Address: Same as above
City, State, Zip Code: Same as above
Telephone Number: Same as above
Email address: Same as above

<b>SWPPP Contact(s):</b>
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## **1. INTRODUCTION**

Loureiro Engineering Associates, Inc. (Loureiro) was retained by Pratt & Whitney to prepare a Stormwater Pollution Prevention Plan (SWPPP) (hereafter referred to as the “Plan”) for its Site located at One Aircraft Road in Middletown, Connecticut (hereafter referred to as the “Site”). This Plan has been prepared to provide Pratt & Whitney with the appropriate information and guidance to ensure that stormwater discharges associated with industrial activities conducted at the Site are properly managed in compliance with the Connecticut Department of Energy and Environmental Protection (CT DEEP) *National Pollutant Discharge Elimination System General Permit for the Discharge of Stormwater Associated with Industrial Activities* (hereafter referred to as the “GP”), that went into effect on November 1, 2025. This Plan has been prepared according to the requirements of the GP and guidance provided by CT DEEP. An electronic copy of the GP is available to Pratt & Whitney personnel at the location specified in Appendix A, GP, and a physical copy of the GP will be kept alongside this Plan. Documentation of GP registration for the Site is provided in Appendix B, General Permit Registration.

In general, this Plan identifies the potential sources of stormwater pollution and provides recommendations for implementing best management practices (BMPs) to reduce these pollutants. This Plan contains the necessary certifications and signatures required by the GP, identifies the Members of the Stormwater Pollution Prevention Team (PPT) and their associated responsibilities, describes the potential sources of pollutants which may reasonably be expected to affect stormwater quality, and presents the stormwater management measures and controls appropriate for the Site. A program for the routine sampling and analysis of the stormwater discharges is also provided to give the Site (i.e., the PPT and/or a contractor) the necessary guidance to comply with the requirements of the GP.

This Plan must be revised and updated periodically and as necessary to include any changes to the configuration and operation of the Site. The conditions requiring amendment to this Plan are identified in Section 8 of this Plan.

### **1.1 Description of the Site**

The Pratt & Whitney Middletown facility occupies approximately 1,100 acres of land, with approximately 100 acres of impervious surface, on the west side of the Connecticut River, which bounds it to the north and east. The western portion of the property, west of River Road, consists of wooded uplands of considerable topographic relief. Most of the facility has been developed over a gently sloping glacial outwash terrace extending east from River Road. The Site is located at

41.5410, -72.5610, and a United States Geological Survey (USGS) Map depicting the location of the Site is included as Figure 1, USGS Site Location Map. A Site Plan is included as Drawing 1.

Pratt & Whitney operates under the Standard Industrial Classification (SIC) Code 3724 (Aircraft Engines and Engine Parts) and North American Industry Classification System (NAICS) Code 336412 (Aircraft Engine and Engine Parts Manufacturing). The facility contains approximately 20 major buildings and numerous auxiliary buildings which are used for manufacturing operations, military aircraft engine assembly and testing, experimental testing, steam generation, storage, fire protection, and facility maintenance. The manufacture and development of jet engines is a high-technology industry using state of the art materials and processes. Specific processes identified at the facility include but are not limited to, metal forming, electroplating, welding, application of protective coating, anodizing, abrasive cleaning, metal finishing, engine testing, and steam generation.

According to CT DEEP's water quality classification maps, the quality of the Connecticut River is "SB", and the quality of the other smaller bodies of water on site is "A". The groundwater quality at the Site is a mix of "GB" and "GA". The section of the Connecticut River in the vicinity of the Site (Waterbody ID CT4000-00\_02, from Hurd Brook in East Hampton to Gildersleeve Island) is identified as being impaired for Perfluorooctane sulfonate (PFOS), polychlorinated biphenyls (PCBs), and Escherichia coli (E. coli) but does not have an established Total Maximum Daily Load (TMDL).

Based on CT DEEP's maps of Natural Diversity Database (NDDB) Areas, there are state and/or federal listed species that occur on site. An NDDB review was conducted in 2010 for renewal of an NPDES permit, and it was determined that there would be no impact on listed species. The letter from CT DEEP is included in Appendix B.

## 2. SIGNATURES AND CERTIFICATIONS

The following section details and provides the certifications required by the GP.

### 2.1 Management Certification

As required by the GP, Section 5.21.1, this Plan must be signed by a responsible corporate officer of the Site as follows:

*"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute."*

Permittee:

Pratt & Whitney

Certifier Name: *Erich Uhlman*

Certifier Title: *Director, EHS*

Certifier's Signature: *Erich Uhlman*

Date: *03/24/2026*

Site/Facility Name: Pratt & Whitney

Site/Facility Address: One Aircraft Road, Middletown, CT 06457

General Permit No.:

2.2 **Certification that the SWPPP Meets Permit Criteria**

As required by the GP, Section 4.3.1.1, this Plan must be certified by a Qualified Professional as defined in the GP as follows:

*I certify that I have thoroughly and completely reviewed the Stormwater Pollution Prevention Plan prepared for the site or facility known as Pratt & Whitney. I further certify, based on such review and site visit by myself or my agent, and on my professional judgment, that the Stormwater Pollution Prevention Plan meets the criteria set forth in the General Permit for the Discharge of Stormwater Associated with Industrial Activity effective on November 1, 2025.*

*I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute.*

Certifier Name: Kurt A. Prochorena, PE

Certifier Title: Vice President/Principal Engineer

Certifier's Signature: 

Date: March 23, 2026

Site/Facility Name: Pratt & Whitney

Site/Facility Address: One Aircraft Road, Middletown, CT 06457

General Permit No.:

### 2.3 Certification of Non-Stormwater Discharges

As required by the GP, Section 4.3.2.9, this Plan must include the following certification of non-stormwater discharges.

*I certify that in my professional judgment, the stormwater discharge from the site or facility known as Pratt & Whitney consists only of stormwater, or of stormwater combined with wastewater authorized by an effective permit issued under section 22a-430 or section 22a-430b of the Connecticut General Statutes, including the provisions of Section 5(b)(10) the General Permit for the Discharge of Stormwater Associated with Industrial Activity effective on November 1, 2025, or of stormwater combined with any of the following discharges provided they do not contribute to a violation of water quality standards:*

- 1. discharges from emergency/unplanned fire-fighting activities,*
- 2. landscape irrigation or lawn watering,*
- 3. uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids.*
- 4. uncontaminated ground water or spring water,*
- 5. uncontaminated groundwater from foundation or footing drains.*
- 6. water sprayed for dust control, in accordance with the conditions of the general permit, and*
- 7. for Sector A only, discharges from the spray down of lumber and wood product storage yards where no chemical additives are used in the spray-down waters and no chemicals are applied to the wood during storage.*

*This certification is based on testing and/or evaluation of the stormwater discharge from the site. I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation, and the on-site drainage points that were directly observed during the test have been described in detail in the Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist unless such floor drain connection has been approved and permitted by the commissioner or otherwise authorized by a local authority for discharge as domestic sewage to sanitary sewer.*

*I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the General Statutes, pursuant to section 53a-157b of the General Statutes, and in accordance with any other applicable statute.*

Certifier Name: Kurt A. Prochorena, PE

Certifier Title: Vice President/Principal Engineer

Certifier Signature: 

Date: March 23, 2026

Site/Facility Name and Address: Pratt & Whitney, One Aircraft Road, Middletown, CT 06457

General Permit No.:

### **3. STORMWATER POLLUTION PREVENTION TEAM (PPT)**

The PPT is responsible for the implementation of all actions set forth in the GP and detailed in this Plan. The PPT must direct all necessary revisions and additions to this Plan as dictated by operational changes at the Site, as required by the provisions of the GP, as well as maintain control measures and take corrective actions where required. At least one PPT Member must be present at the Site or on call during all operational shifts. A list of the names and contact phone numbers of all PPT Members and their specific responsibilities is provided in Appendix C. Any changes in Members serving on the team shall be updated in Appendix C.

The PPT is comprised of Members of the Pratt & Whitney site module centers and support operations. The PPT Leader's responsibilities are to ensure that the SWPPP is implemented, maintained, and revised as necessary. The PPT Leader will have the responsibility of ensuring that all provisions of this SWPPP are performed, such as periodic inspections, follow-up to inspections, any required monitoring, recordkeeping, reporting and training. The PPT Leader responsibilities also include ensuring that the PPT fulfills its responsibilities and the PPT Members complete SWPPP activities as necessary. The other PPT Members will perform duties as directed by the PPT Leader and as required to support the SWPPP activities.

## **4. POTENTIAL POLLUTANT SOURCES**

### **4.1 Summary of Drainage Areas**

The Site has 6 drainage areas. Stormwater drainage areas are illustrated on Drawing 1 and general descriptions of each area are provided in Table 4-1, Drainage Area Summary. Also provided in Table 4-1 is a summary of the potential pollutants associated with the stormwater collection points for the drainage areas, a summary of the area activities and stormwater components, and the receiving stream body. Drawing 2, Potential Pollutant Sources, depicts potential stormwater pollutant sources at the Site.

At the Pratt & Whitney Middletown facility, there are six point source discharges of stormwater, five of which are associated with industrial activities. Stormwater from the facility is collected and conveyed through underground stormwater drainage systems that discharge the stormwater through several outfalls either directly to the Connecticut River, or indirectly via Dart Brook and an unnamed tributary to the Connecticut River. Figure 1 shows the location of the facility and receiving waters which receive stormwater discharges. In many instances, the storm drainage system is also used to collect and convey non-contact cooling wastewater that is covered under a National Pollutant Discharge Elimination System (NPDES) permit.

### **4.2 Non-Stormwater Discharges**

The stormwater discharges identified in this Plan are comprised of stormwater, allowable non-stormwater discharges as identified in the GP, or process wastewaters authorized by an effective permit. At the time of certification of this Plan, there are no non-allowable, non-stormwater discharges entering the stormwater drainage system. The Certification of Non-Stormwater Discharges is included in Section 2.3 of this Plan, and the supporting information for the certification is provided in Appendix D, Certification of Non-Stormwater Discharges Supporting Information.

The facility is authorized for the discharge of wastewaters under the following other general or individual permits issued by CT DEEP:

- NPDES Individual Permit: CT0001406
- State Individual Pretreatment Permit: SP0002409
- Miscellaneous Discharges of Sewer Compatible Wastewater General Permit: CTMIU0004
- General Pretreatment Permit for Significant Industrial User, Dewatering, and Remediation Discharges (Formerly General Permit for the Discharge of Wastewaters From Significant Industrial Users): CTSIU0023

- Domestic Sewage General Permit: GDS000164
- Wastewater Associated With Food Preparation Establishments General Permit - Fats/Oils/Grease Model Program

The Pratt & Whitney Middletown facility maintains information to manage air emission, waste generation, and wastewater discharge data for the entire Site. A drain labeling identification system is used to identify the location of the specific drain associated with each wastewater discharge. Labels are provided to communicate the type of conveyance system associated with the drain. Instructions on the labels direct personnel to contact the Environment, Health and Safety (EH&S) Department prior to connecting any new wastewater sources to the drain.

Pratt & Whitney's Management of Change (MOC) system is used to identify, among other issues, any facility changes that may involve a drain. Before a drain change/modification is made, the proposed change is reviewed by the EH&S Department and others to ensure that only appropriate wastewaters are discharged to the drain before the change/modification is made.

#### 4.3 **Summary of Potential Pollutant Sources & Controls**

The tables referenced in this section provide an inventory of the potential pollutant sources located within the discharge drainage areas of the Site. In addition, a detailed description of the potential pollutant sources related to stormwater runoff is presented in this section. In addition, an inventory of the potential pollutant sources located within the discharge drainage areas of the Site Areas of concern due to their potential to contribute to stormwater pollution at the Site include oil and chemical storage, waste storage, other outdoor storage, loading and unloading operations, roof areas, fueling operations, and onsite waste disposal practices. Pratt & Whitney will notify CT DEEP no fewer than 30 days prior to making any planned physical alterations or additions to the Site that qualify the Site as a new source or that could significantly change the nature or significantly increase the quantity of pollutants discharged. The relocation of chemicals to storage areas other than those presented in this Plan will undergo the MOC process, and any notable changes will result in an amendment to this Plan.

##### 4.3.1 **Outdoor Oil and Chemical Storage**

There are a variety of outdoor aboveground storage tanks (ASTs), as well as several pieces of oil-filled equipment, located throughout the Site. All ASTs are equipped with secondary containment. These tanks and equipment are described in Table 4-2, Inventory of Exposed Materials. Oil and chemical storage located within buildings is not included, as it is not likely to be a source of stormwater pollution.

#### 4.3.2 Waste Storage Areas

##### 4.3.2.1 Hazardous Waste Storage Area

Hazardous wastes are stored within the Hazardous Waste Storage Building, B-400, as well as in B-403, a self-contained storage unit. Both buildings have secondary containment to prevent any spills from leaving the building.

##### 4.3.2.2 Roll-off Storage Building

The Roll-off Storage Building (B-250) is utilized to store a majority of the roll-offs used at the facility. Materials and/or roll-offs are transferred from various locations throughout the Middletown facility to this building. There are six bay areas which can each hold two roll-offs. One bay area has a higher roof than the others to allow for crushing/compacting of materials. Because materials typically do not contain free liquids and are stored in separate roll-offs, the likelihood of a spill is low.

The likelihood for contamination of stormwater is extremely low because the roll-offs are stored under a roof, and the concrete floor directs liquids into six interconnected sumps with a holding capacity of approximately 60 gallons each (360 gallons total), which prevent migration of a spill outside.

In addition to the roll-off storage area in B-250, there are also several isolated roll-off containers located outside for scrap materials such as wood and metal. Containers, including roll-offs, that are stored outside are closed or covered when not in use.

##### 4.3.2.3 Refuse and Recyclable Storage Methods

There are several areas located throughout the facility used for the collection of refuse/recyclable materials. The size and type of containers vary; however typical types of construction materials are metal or plastic. All covers are kept closed when containers are not being loaded or unloaded. Examples of materials which may be collected are construction debris, cardboard, plastic, metal, and trash. Wastes on site are generally picked up on an as-needed basis.

These collection areas are either located under cover to prevent contact with stormwater, or if exposed to precipitation the storage containers are covered, with drain plugs intact. Because some of these collection containers are located outside, there is the potential to pollute stormwater if left uncovered.

#### 4.3.3 Salt Storage Area

Salt is used on the facility's roads in the winter as necessary. Salt is stored year round in B-97, a structure that is provided with cover on three sides, located east of B-96. B-97 is located outside the 100-year floodplain and is within a GB designated groundwater area. In the future, if moved, the salt storage facilities will not be placed within the 100-year floodplain. The salt is typically used directly without sand and applied to the facility roadways. Any spills occurring during addition or removal from the salt storage pile will be promptly cleaned up.

The potential for stormwater pollution from the storage of salt at the facility is low based on the practice of storing it only in the covered storage building. B-97 is closed on three sides, and is provided with permanent cover. The surrounding storage area is sloped so as to prevent run-on of stormwater into the storage area. When the de-icing materials are not in use for extended periods of time, hay bales or equivalent materials such as boom-type materials are installed to prevent material from leaving the containment area.

The installation of any additional temporary or permanent salt/sand storage structures will be controlled through the MOC system and evaluated for compliance with the GP.

#### 4.3.4 Other Outside Storage Areas

There are various areas which are utilized as outside storage areas. These areas are identified on Table 4-2. The primary materials stored in these areas include wood and fiberglass boxes, wood pallets, and metal and fiberglass fixtures used in jet engine testing.

Facility practice dictates that only clean objects are stored outside. However, because these storage areas are located outside, there is the potential to pollute stormwater if any of the objects are contaminated with oils or chemicals. In the event that an impact to stormwater is identified, the following corrective action will be taken as soon as practicable:

- Identify the source of the stormwater pollution.
- Discard or move the stormwater pollution source inside the facility, if possible.
- Place a tarp or other similar type covering over the stormwater pollution source to eliminate contact between stormwater runoff and the pollution source.

#### 4.3.5 Loading and Unloading Operations

Loading and unloading areas are summarized in Table 4-2, including the types of substances loaded or unloaded, and the associated release prevention provisions. Typical methods for transfer are covered in Table 4-3, Oil and Toxic/Hazardous Substance Transfer Methods. In general, these operations include bulk deliveries of chemicals and oils, and non-bulk deliveries of chemicals and

oils in drums and other containers. In addition, there is shipment of wastes in both bulk and non-bulk form at the Site.

All hazardous and contaminated materials shipped from the Site are transported by approved transporters that are either contractors (or subcontractors), or are employed by Pratt & Whitney. All transporters contracted or employed by Pratt & Whitney are required to comply with applicable state and federal regulations.

#### 4.3.5.1 Bulk Transfers

The likelihood for a release or contamination of stormwater during a tanker truck delivery is low. Where tanks are located close to catch basins or storm drains, appropriate containment structures are provided to prevent any spills from entering the storm drain system. The outdoor storage tanks are equipped with sufficient containment sized to hold at least the contents of the tank in the event of a spill. During the actual transfer process, should the tank overflow or the transfer hose fail, the operators would immediately stop the transfer and any spilled material would be contained and cleaned-up. The risk of failure of the entire tanker truck itself is extremely low and therefore poses little risk of contamination of stormwater. Before all transfers, confirmation is made that there is adequate freeboard available in the receiving tank to contain the contents of the transfer.

#### 4.3.5.2 Non-Bulk Deliveries

Non-bulk deliveries include both solids and liquids. Solid materials are received in bags or drums with maximum weights typically not exceeding 500 pounds. Any spills of solid materials would be easily cleaned up using available spill control equipment. Liquids are typically received in deliveries of 55-gallon drums but include containers up to 275-gallon totes.

#### 4.3.5.3 In-plant Material Transfer

Materials are routinely transferred within and between the main manufacturing buildings. Table 4-3 lists the principal transfer methods used along with the types of oils and toxic/hazardous substances transferred. The primary method used to transfer containers is via fork trucks equipped with either a pallet or single drum attachment. Other methods used to transfer containers include hand trucks, hand-carried safety cans, carts, and motorized carts. Some liquids in tank systems are transferred via pipeline. Other liquids may be pumped from the tank or gravity fed into containers for container transfer.

As a general rule, the transfer of materials in containers within the manufacturing buildings poses a very low risk potential for stormwater contamination. For container transfer operations occurring outside, there exists a potential, although minimal, for stormwater contamination. All containers

are closed and sealed during transfer. If a spill should occur, it would be noticed by the fork truck operator and would be cleaned up immediately in accordance with the Site spill response procedures.

#### 4.3.6 Roof Areas

There are several processes within the manufacturing facility that have roof exhaust vents. Processes at the facility which have the potential to promote roof vent drippage include mist generating processes such as fluorescent penetrant inspection spray booths, chemical lines, industrial spray washers, and vacuum pumps; and particulate generating processes, such as paint spray booths, grit blast machines, and grinding operations.

A listing of process exhaust vents and stacks at the Site is managed in a tabular format. These areas of the Site are updated whenever a process change is completed at the Site. The MOC system is utilized in order to track the updated location and process information for each stack or vent on a roof area which may be subject to deposition of drippage or particulates. There is a low potential for the contamination of stormwater because most exhaust vents that have the potential for drippage have been provided with pollution control equipment, such as mist eliminators and dust collectors. There are baghouses at 4 locations on site, located outside of B-150 and B-220.

#### 4.3.7 Fueling Operations

Onsite fueling of company vehicles occurs at a filling station located at B-310. The B-310 area is equipped with a gasoline pump and a diesel pump for fueling company vehicles. The pump is of commercial grade and is located within the off-loading containment area.

During fueling operations there is the possibility for a spill to occur, however, the magnitude of the spill would be very low. Similar to gas stations, the pumps will pump fuel only when the nozzle is being held. Therefore, the operator would notice any accidental spills immediately. If a spill occurred, spill response and clean-up procedures would be followed. In addition, the fueling area is located under cover in the containment area. There is one catch basin located in the vicinity of this area that is located such that any spills from the fueling area cannot flow or migrate towards the catch basin.

#### 4.3.8 Onsite Waste Disposal Practices

Presently, there are no active waste disposal areas at the Site. There are two inactive onsite waste disposal areas: the capped F006 Landfill that was used for disposal of wastewater treatment sludge from electroplating operations (which includes an area that was abandoned disposal area for

construction debris and general refuse), and the former Electrochemical Machining (ECM) Landfill that was used for disposal of ECM filter cake.

#### 4.4 **Spills and Leaks**

Under the GP, Section 4.3.2.4(b), Pratt & Whitney is required to document any spills or leaks of five (5) gallons or more of petroleum products, or of toxic or hazardous substances that could affect stormwater. A listing of spills and leaks that occurred outside in the three years prior to the certification date of this Plan is included in Appendix E, Spill Records. The Pratt & Whitney Middletown facility uses an Incident Tracking Analysis (ITA) database to record and manage reported spills that occur on-site.

Drawing 3, Site Spill Locations, is included to show locations where major spills have occurred at the Site after the date of three years prior to the date of certification of this Plan.

## **5. MEASURES AND CONTROLS**

Control measures implemented by Pratt & Whitney include BMPs and other structural and non-structural practices which are used to prevent or minimize the discharge of pollutants to stormwater. A combination of management procedures, structural controls, and employee training provides the most effective means of stormwater management. The GP contains a list of control measures and inspection frequencies that are expected to be in place to minimize the discharge of pollutants in stormwater runoff from the Site. This section details the control measures in place and management practices that should be implemented at Pratt & Whitney.

### **5.1 Good Housekeeping**

In general, good housekeeping practices are designed to maintain a clean and orderly work environment. Poor housekeeping in areas that are exposed to rainfall can result in an increased potential for stormwater contamination. A clean and orderly Site reduces the possibility of accidental spills caused by mishandling of chemicals and equipment, and should reduce safety hazards to Site personnel. Well maintained material and chemical storage areas will reduce the possibility of stormwater being exposed to pollutants. Area supervision and module center employees are responsible for ensuring that their areas are maintained properly. At a minimum, employees must contribute to keeping the Site workplaces clean and orderly to minimize the potential for a spill or release. The following is a list of good housekeeping practices that should be implemented at the Site:

- Sweep or vacuum at regular intervals or, alternatively, wash down the area and collect and/or treat, and properly dispose of the washwater.
- Store materials in appropriate containers. Liquid materials require appropriate secondary containment and cover.
- Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.
- Ensure that all dumpsters, trash compactors, and roll-off containers used to store waste or recyclable materials are in sound, watertight condition and have covers and drain plugs intact, are in roofed areas or in secondary containment areas that will prevent exposure to rainfall.
- All covers on dumpsters not under a roof must be closed when dumpsters are not being loaded or unloaded.

- Loading docks (excluding those that allow a vehicle to enter the building) must be protected with a permanent roof or other structure that protects the loading dock from direct rainfall.
- Stormwater collection and drainage facilities adjacent to the loading dock must be designed and maintained in a way that prevents any materials spilled or released at the loading dock from discharging to the storm sewer system.
- Drains located directly beneath the loading dock must be routinely inspected for the accumulation of sludge, sediment, grit, tailings, trash, and any other debris. Drains must be cleaned out when the depth of debris reaches half of depth of the drain.
- Eliminate or otherwise seal floor drains which are connected to a storm sewer system or if the connection is unknown.
- Identify roof areas that may be subject to drippage, dust or particulates from exhausts or vents or other sources of pollution. Inspect such areas to determine if any potential sources of stormwater pollution are present, and if so, minimize the sources or potential sources of pollution.

## 5.2 Preventive Maintenance (PM)

PM activities, as outlined in the GP, include the following:

- Inspection and maintenance of stormwater management devices (e.g., cleaning stormwater treatment devices, catch basins) that could fail and result in contamination of stormwater.
- Visual inspection, maintenance, and/or testing of onsite equipment and systems to identify conditions that could cause breakdowns or failures resulting in discharges of pollutants to stormwater.
- Maintaining non-structural control measures, such as keeping spill response supplies available, and ensuring that personnel are appropriately trained.
- Cleaning catch basins when the depth of debris reaches half of the sump depth and keeping the debris surface at least six inches below the lowest outlet pipe.
- Inspecting and maintaining baghouses at least quarterly to prevent the escape of dust from the system and immediately removing accumulated dust at the base of the exterior baghouse and surrounding environment.

Several groups are responsible for PM at the Site, including Site Facilities & Services and Product Delivery Center Facilities & Services. PM activities performed by Pratt & Whitney include the regular inspection and testing of plant equipment and operational systems. These inspections should uncover conditions such as cracks or slow leaks which could result in discharges of chemicals or oil products to stormwater. The program should prevent breakdowns and failures by

adjustment, repair or replacement of equipment. An effective preventive maintenance program should include the following elements:

- Schedule periodic inspections or tests for all equipment which can result in a discharge to the stormwater system;
- Appropriate and timely adjustment, repair or replacement of all such equipment to ensure proper working order; and
- Record keeping of all inspections, repairs, tests, etc.

A PM system is in use at Pratt & Whitney that initiates the inspection of equipment so that repairs can be made before breakdowns occur. This is a plant-wide system used in the inspection and maintenance of all types of equipment. New equipment which may have an impact on stormwater quality (e.g. air particulate emissions) is evaluated through the site MOC process, and added to the PM schedule as necessary. At predetermined intervals, an inspection form is issued for a particular piece of equipment, and the receiver of the inspection form performs a PM check on the piece of equipment according to a prescribed inspection procedure. After the inspection is completed, the date of completion of the inspection is entered into the computer. The inspector also records the time spent on the inspection, and in this way completion of the required inspection is assured.

### 5.3 **Spill Response Procedures**

Pratt & Whitney should maintain emergency response procedures in order to minimize hazards to human health or the environment caused by fires, explosions, or any unplanned release of oil products or toxic or hazardous substances. In the event of a release or spill, Pratt & Whitney should follow the Hazardous Materials Spill Response Plan provided in Appendix F, Emergency Response Plan Excerpts. Pratt & Whitney employees are only authorized to respond to incidental releases as defined by the Occupational Safety and Health Administration (OSHA) in 29 Code of Federal Regulations (CFR) 1910.120. In the event of a non-incidental release, Pratt & Whitney will contact a spill contractor to mitigate the release.

Employees are aware of notification procedures in the event of a spill or leak, including when to contact appropriate facility personnel, emergency response agencies, and regulatory agencies. Spill response contact information is posted in locations that are readily accessible and available to employees. The Environmental Release Reporting Procedure is included as Appendix G.

All spills are to be recorded in the ITA system. The ITA system is a computerized tracking database for all reported spills and releases. All spills of 5 gallons or more that could affect stormwater are to be added to Drawing 3 and the listing included in Appendix E, and are tracked on the computer ITA system. This information is updated on a semiannual basis and is shared with the PPT during the annual training presentation.

The Pratt & Whitney Fire Department and Facilities and Services maintain spill equipment at the Site. Fire Department vehicles that house spill response equipment are visually inspected daily by Fire Department personnel. After a spill response, Fire Department personnel perform an inventory review of the spill response equipment. The inventory list is kept on file at Fire Headquarters and is also included in a computerized spreadsheet.

Any spill, leak, release, or discharge of non-stormwater not authorized by the GP or another permit should be reported to the CT DEEP Emergency Response and Spill Prevention by calling **860-424-3338** or **866-DEP-SPIL (866-337-7745, toll free)**, 24 hours/day. Signs with emergency contact information should be posted throughout the Site.

For any oil release that violates state water quality standards, causes a film or sheen on the water's surface, or leaves sludge or emulsion beneath the surface, the PPT Leader should report it to the EPA's National Response Center at (800) 424-8802.

#### 5.4 **Employee Training**

All employees whose activities may affect stormwater quality must receive training within 90 days of employment and at least once a year thereafter. Employees who should receive training include but are not limited to: PPT Members; employees responsible for implementing activities necessary to meet the conditions of the GP (e.g., inspectors, maintenance personnel); and, employees who work in areas where industrial materials or activities are exposed to stormwater.

The PPT Leader is responsible for organizing an adequate stormwater training program. Training must be conducted or supervised by a Member of the PPT or other qualified person and a written record of training must be maintained in Appendix H, Training Records and Agenda, and in the internal online database, including the dates of training, employee name, employee responsibility, and training agenda.

Detailed information, including a listing of training courses, can be found in the Pratt & Whitney EH&S Training program. Training material regarding stormwater pollution prevention and responsibilities is included in the annual environmental training to facility employees. The PPT Members are trained upon joining the PPT and annually thereafter. PPT Members are issued a Stormwater Inspection Sheet outlining the issues and items to be addressed when performing the semiannual inspections. Training records will be retained at the Site for at least five years.

If related to the scope of their job duties, personnel must be trained in at least the following:

- An overview of what is in the SWPPP;

- Spill response procedures, emergency equipment locations, good housekeeping, maintenance requirements, and material management practices;
- The location of all controls on the Site required by the GP, and how they are to be maintained;
- The proper procedures to follow with respect to the control measures on site;
- When and how to conduct inspections, record applicable findings, and take corrective actions; and,
- The Site's emergency procedures.

The PPT Leader must also ensure the following personnel understand the requirements of the GP and their specific responsibilities with respect to those requirements:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges;
- Personnel who are responsible for conducting and documenting inspections and monitoring; and,
- Personnel who are responsible for taking and documenting corrective actions.

## 5.5 Sediment and Erosion Control

As required by the GP, Section 4.2.9, Pratt & Whitney must identify areas of the Site that have a potential for soil erosion due to topography, activities, or other factors, and must include measures to limit erosion and stabilize such areas. Due to topography, there are areas of the Site that do have a potential for erosion. Areas subject to erosion that are identified are addressed with measures and controls to stabilize exposed areas to minimize onsite erosion and offsite discharges of sediment. Sediment and erosion controls undertaken comply with the *Connecticut Guidelines for Soil Erosion and Sediment Control*, and the *Connecticut Stormwater Quality Manual*. No polymers or other chemical treatments for erosion and sediment control are in use at the Site.

## 5.6 Management of Runoff

Stormwater management practices that are considered appropriate to Pratt & Whitney are as follows:

- Rain leaders and catch basins are installed to direct stormwater through the storm drainage system to a remote outfall away from the industrial activities.

- Access roads, parking areas, and truck routes have been paved to reduce erosion and be properly maintained for continued utility. All unpaved areas should be regularly monitored to ensure limited erosion.
- Existing containments surrounding the tanks indicated in Table 4-2 function as stormwater diversion devices.
- The bulk tank farm containment passes through an oil/water separator prior to discharge. This oil/water separator is inspected prior to allowing the water to discharge. Oil/water separators at the Site that discharge to stormwater are listed in Table 5-1, Oil/Water Separators and Sumps.
- The bulk tank farm Jet Fuel Release containment system is equipped with an oil/water separator. This oil/water separator is regularly inspected.
- Covers are supplied for all dumpsters, compactors, and roll-offs located at the facility.
- Catch basins are used throughout the Site to trap sediment.
- The former F006 Landfill utilizes a sedimentation basin to collect all run-off from the engineered cap drainage system.
- Road sweeping is no longer performed as the facility uses a salt solution instead of sand for winter road maintenance.

The MOC system is utilized in order to evaluate proposed facility modifications and the need for controls to be used to divert, infiltrate, reuse, treat, or otherwise reduce stormwater runoff. Such measures might include: catch basins with sumps and hoods installed; oil/water or grit separators; drainage outfalls discharging to riprap pads or energy dissipaters; detention or retention basins; impervious areas without curbs in order to encourage sheet flow runoff to vegetative areas; areas of pervious pavement or other engineered pervious surfaces; infiltration structures; biofilter/bioremediation used to treat runoff; and sedimentation chambers, swirl concentrators, or other stormwater treatment structures used prior to final discharge.

### 5.7 **Equipment and Vehicle Washing**

The GP does not authorize the discharge of wastewaters from the washing or rinsing of equipment, buildings or vehicles. No outside washing of vehicles, equipment, or buildings is performed at the Site that would allow wash waters to enter any storm drainage system.

### 5.8 **Floor Drains**

Floor drains associated with industrial activity and found discharging to the stormwater system have been sealed and removed from service. Though none are known to be present at this time, if unpermitted floor drains are identified, they shall be sealed and removed from service.

It should be noted that there are floor drains in areas of the Site (i.e., B-410) that do not discharge to the stormwater system. These floor drains discharge to a separate system complete with an oil/water separator that is connected to a closed system that does not discharge.

### 5.9 **Roof Areas**

The roof areas of the Site are included during site inspections. Any areas with contamination, or the potential for contamination, are identified and evaluated during inspections. There is a low potential for the contamination of stormwater because most exhaust vents that have the potential for drippage have been provided with pollution control equipment, such as mist eliminators and dust collectors. However, if roof vent drippage is discovered, the following corrective action will be taken:

- Identify the process source;
- Evaluate the performance of the existing air pollution control technology, if any;
- Repair malfunctioning control technology and perform a detailed root cause/corrective action evaluation and implement changes on all similar processes as appropriate;
- If the process does not have any control technology or if the existing technology is inadequate, investigate alternative air pollution control equipment; and
- Implement new technology, if feasible.

### 5.10 **Minimize Exposure**

Outdoor storage areas are located throughout the Site. These areas are generally used for the storage of dry, solid materials. A tabular listing of these storage locations, including the types of material stored, is included in Table 4-2.

Chemicals, and previously used chemical containers, are stored inside buildings or covered areas and are provided with secondary containment as appropriate. All areas where chemicals, or previously used chemical containers, are stored are either provided with containment which will hold at least the volume of the largest chemical container, or 10 percent of the total volume of all containers in the area, whichever is larger, without overflow from the containment area.

### 5.11 **Future Construction**

Any construction activity that disturbs greater than one acre must be conducted in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (as amended), including the creation of a Stormwater Pollution Control Plan. All construction activities, regardless of size, shall comply with the Connecticut 2024

Guidelines for Soil Erosion and Sediment Control during construction and the 2024 Stormwater Quality Manual for the design and implementation of post-construction stormwater management measures. In addition, Pratt & Whitney must avoid, wherever possible, the use of copper or galvanized roofing or building materials where these materials will be exposed to stormwater.

All future construction activities at the Site will be designed to ensure that oil and sediment control structures or other devices are used within the drainage system. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing stormwater management measures. Construction activities and specific control measures will be assessed under the MOC system as necessary. Any evaluation, construction, or modification of the design of an engineered stormwater drainage system, as defined in the Connecticut Stormwater Quality Manual, requires certification by a Professional Engineer (PE).

#### 5.12 **Resilience Measures**

In the event of major storm event such as a flood or hurricane, Pratt & Whitney will follow the emergency response procedures in Appendix F. In addition, Pratt & Whitney will consider the resilience measures outlined in Section 4.2.3.8 of the GP when selecting and designing new stormwater control measures.

## **6. INSPECTIONS**

The GP requires two types of inspections: routine inspections that must be conducted monthly, and comprehensive site inspections that must be conducted semiannually. The primary purpose of these inspections is to ensure that management practices and control measures prescribed in this Plan are being implemented correctly and effectively. In addition, the inspections can help determine if changes to stormwater management practices and controls measures need to be made due to changes at the Site. Inspections must be performed by qualified personnel. Routine inspections and semiannual inspections will be conducted by Members of the PPT or an outside contractor.

### **6.1 Routine Inspections**

The Site shall complete the required routine inspections on a monthly basis. At least one routine inspection per calendar year must be conducted while a stormwater discharge is occurring. Appendix I, Monthly Inspection Forms, contains the forms used to facilitate and document the completion of the inspections.

During normal operating hours, Pratt & Whitney must conduct inspections of areas covered by the requirements in the GP, including, but not limited to, the following:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in this Plan and those that are potential pollutant sources;
- Areas where spills and leaks have occurred in the past three years; and,
- Stormwater discharge points.

On a monthly basis, PPT Member(s) perform visual inspections of the areas of the Site listed above. Inspections of the outdoor oil storage containers (Table 4-2) are conducted under the Site's Spill Prevention, Control, and Countermeasure Plan.

Copies of the completed inspection forms should be maintained in the PPT Leader's office area for a period of no less than five (5) years after the date that coverage under the GP expires or is terminated.

### **6.2 Semiannual Comprehensive Compliance Evaluations**

In accordance with the requirements of the GP, Section 4.4.3, Comprehensive Site Compliance Evaluations must be performed at the Site on a semiannual basis (twice per year). These evaluations should be conducted during a rainfall event if possible. They should consist of a

documentation review, interviews with Site personnel, and a visual inspection of the Site. A Semiannual Comprehensive Compliance Evaluation Form is provided in Appendix K. During normal operating hours, Pratt & Whitney must conduct inspections of areas of the Site covered by the requirements in the GP, including, but not limited to, the following:

- Drainage areas;
- Buildings, structures, permanent cover, and impervious area;
- Structural control measures;
- Non-structural stormwater control measures;
- Stormwater Management Systems;
- Stormwater discharge points;
- Areas where industrial materials or activities are exposed to stormwater;
- Vehicle and equipment fueling, maintenance, cleaning, and storage areas;
- De-icing material storage areas;
- Industrial materials storage areas;
- Materials handling activities areas;
- Other areas where industrial activity has taken place;
- Areas identified in this Plan and those that are potential pollutant sources;
- Spill prevention and response procedures (e.g., presence of spill kits and dry clean-up methods); and,
- Resilience measures.

Completed forms must be maintained as a part of this Plan in the PPT Leader's office area for a period of no less than five (5) years after the date that coverage under the GP expires or is terminated.

### **6.3 Inspection Follow-Up**

Upon completion of each inspection, the routine inspection logs or semiannual inspection reports must be reviewed by the PPT Leader to identify observations or unsatisfactory conditions that require remedial action. The Members of the PPT are responsible for ensuring that any required follow-up items are completed in a timely manner. All completed follow-up items shall be tracked using a tracking sheet. An example Corrective Action Tracking Sheet is included in Appendix J, Corrective Action Documentation. The date of completion and PPT Member's name shall be noted on the tracking sheet.

## **7. STORMWATER MONITORING PROGRAM**

The GP requires Pratt & Whitney to perform stormwater outfall monitoring. Pratt & Whitney operates under SIC Code 3724, and therefore is subject to the monitoring requirements for Sector AB (Transportation Equipment, Industrial or Commercial Machinery Facilities) under Section 8.28 of the GP. The monitoring requirements are detailed in the following subsections. Stormwater monitoring will be conducted by an outside contractor.

A summary of the stormwater discharge sampling data that was collected by Pratt & Whitney under the previous permit (*General Permit for the Discharge of Stormwater Associated with Industrial Activity*) is provided in Appendix L, Summary of Monitoring During Previous Permit Term.

### **7.1 Stormwater Sampling Locations**

As described in Section 4.1 of this Plan, the Site has a total of five point source discharges of stormwater associated with industrial activities. Samples are collected from the locations listed in Table 4-1. The sampling locations are marked with signs to aid in identification.

The Site does not discharge within 500 feet of a tidal wetland. The stormwater from the Site discharges to the Connecticut River (Waterbody ID CT4000-00\_02) from sampling locations SW001, SW003, SW005, SW006, and SW008 (via an unnamed tributary). The Connecticut River does not have a TMDL and is classified as “SB” water quality. The stormwater from sampling location SW007 discharges to Dart Brook (no Waterbody ID), which ultimately discharges to the Connecticut River. Dart Brook does not have a TMDL, and is classified as “A” water quality.

### **7.2 Stormwater Monitoring Procedures**

The following sampling procedures must be followed during the quarterly, semiannual, and annual sampling events:

- Samples can only be collected from a storm event that occurs at least 72 hours after the last previous storm event generating a stormwater discharge from the Site.
- For sites that discharge through a detention basin or other stormwater management structure, the sample must be taken at the discharge from the basin or structure.
- Grab samples shall be used for all monitoring and shall not be commingled or combined with other waste streams.
- Collection of grab samples must begin within the first 30 minutes of stormwater being discharged at the sampling location and must be completed as soon as possible. If collection

is more than 30 minutes after discharge begins, the reason for the delay must be documented on the sampling form and in Appendix M, Deviations from Monitoring Schedule.

- Samples must be collected at the designated outfalls or at the nearest feasible location representative of the discharge if the designated sampling location is inaccessible.
- All samples for a monitoring event must be taken during the same storm event, if feasible. Due to the number of samples that are required for the Site, more than one sampling event may be required.

The following information must be collected and recorded for the storm events monitored:

- The place, date, and time of sampling and the time the discharge started;
- The person(s) collecting samples;
- The dates and times the analyses were initiated;
- The person(s) or laboratory that performed the analyses;
- The analytical techniques or methods used; and,
- The results of all analyses.

### 7.3 Quarterly Visual Assessment

Once each quarter for the entire permit term, Pratt & Whitney must collect stormwater discharge samples from the sample locations designated in Section 7.1 of this Plan and conduct a visual assessment for specific water quality characteristics. For monitoring purposes, the quarters begin on January 1<sup>st</sup>, April 1<sup>st</sup>, July 1<sup>st</sup>, and October 1<sup>st</sup>. If the Site is subject to snowfall during one or more of these quarters, at least one quarterly visual assessment must capture snowmelt discharge if feasible and the corresponding form should be annotated to indicate this.

Stormwater discharge visual assessment shall be performed in accordance with Pratt & Whitney's Stormwater Discharge Visual Assessment Plan included in Appendix N. The visual assessment must be made with the sample in a clean, colorless glass or plastic container and in a well-lit area. During the assessment, the sample must be qualitatively evaluated for the following water quality characteristics:

- Color;
- Odor;
- Clarity (diminished);
- Floating solids;
- Settled solids;

- Suspended solids;
- Foam;
- Oil sheen; and,
- Other obvious indicators of stormwater pollution.

The Quarterly Visual Assessment Form, which is included in Appendix N, can be used to document the results of each visual assessment event. If unsatisfactory water quality characteristics are observed during a visual assessment, this may indicate that the stormwater pollution control measures at the Site are inadequate or are not being properly implemented or maintained. After an unsatisfactory assessment, Pratt & Whitney must review and revise this Plan as appropriate, following the corrective action schedule in Section 8.2 of this Plan. A monitoring remedial action log is also included in Appendix N. This form should be used to document any corrective actions or changes in control measures completed as result of an unsatisfactory visual assessment.

If Pratt & Whitney is unable to collect a visual assessment sample during an entire sampling quarter, the circumstances pertaining to this must be documented and the documentation must be maintained in Appendix M of this Plan.

#### **7.4 Benchmark and Toxicity Monitoring**

In addition to quarterly visual assessments, Pratt & Whitney must perform benchmark stormwater monitoring for the parameters listed in Table 7-1, Summary of Sector AB Monitoring Requirements, at the specified frequencies. Pratt & Whitney shall perform monitoring in accordance with the Stormwater Sampling and Analysis Plan provided in Appendix O.

The first semiannual benchmark monitoring event of each sampling year must be conducted between January 1<sup>st</sup> and June 30<sup>th</sup>, and the second must be conducted between July 1<sup>st</sup> and December 31<sup>st</sup>. Monitoring events must be separated by at least 30 days. The semiannual stormwater samples may be collected along with the quarterly visual samples. As with the quarterly visual assessment, the stormwater discharge samples must be collected from the sample locations designated in Section 7.1 of this Plan.

#### **7.5 Aquatic Toxicity Monitoring**

Annual aquatic toxicity monitoring must be performed in the first year after receiving the Notice of Coverage from CT DEEP's Commissioner. Aquatic Toxicity must be included in a regularly scheduled semiannual sample.

## 7.6 Monitoring of Discharges to Impaired Waters

Impaired waters are waterbodies that have been assessed by CT DEEP as not meeting Connecticut's Water Quality Standards for a given designated use such as fish and wildlife habitat, recreation, or agricultural and industrial supply. According to the GP, industrial activities that discharge directly to impaired waters, as identified by CT DEEP, must conduct stormwater monitoring in addition to the standard benchmark monitoring discussed in Section 7.4 of this Plan.

All fresh waterbodies in the state of Connecticut are considered impaired for fish consumption due to atmospheric deposition of mercury. Sites where stormwater is or could be exposed to sources of mercury must monitor for mercury once per year. Due to the operations conducted by Pratt & Whitney, the Site does not have the potential to contaminate stormwater with mercury and therefore no additional monitoring for mercury is required.

In order to achieve water quality standards for dissolved oxygen in Long Island Sound, a statewide limit has been implemented by CT DEEP to address nitrogen loading to the Sound. Monitoring for nitrogen in stormwater runoff, in the form of nitrate and total Kjeldahl nitrogen, is already required by the GP.

Based on a review of CT DEEP's list of impaired waters, the site discharges into a section of the Connecticut River that is impaired for PFOS, PCBs, and E. coli, so Pratt & Whitney will be required to monitor annually for these.

## 7.7 Test Procedures

The following testing procedures must be followed:

- All pollutant parameters must be tested according to methods pursuant to 40 CFR 136 for the analysis of pollutants having approved methods under that part, unless a method is required under 40 CFR Subchapter N or unless an alternative method has been approved in writing pursuant to 40 CFR 136.5.
- Acute toxicity biomonitoring tests must be conducted according to the procedures specified in Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, 5<sup>th</sup> Edition (Environmental Protection Agency (EPA) 821-R-02-012).

A list of the required monitoring parameters should be submitted to the analyzing laboratory prior to a sampling event, so that the lab can supply Pratt & Whitney with the necessary collection containers. It is recommended that an extra set of containers be obtained in the event any are damaged during the sampling event or in transport from the laboratory. The laboratory may also

provide coolers and corresponding paperwork such as a chain-of-custody form and sample container labels. Instructions for the proper completion of the corresponding paperwork may be obtained through the laboratory.

## 7.8 Evaluation of Benchmark Monitoring Results

As required by the GP, Section 4.5.1, the results of Pratt & Whitney's Semiannual Benchmark Monitoring must comply with the benchmarks for the parameters specified in Table 7-1. Pratt & Whitney must calculate the average of the monitoring results from the four (4) most recent sampling events for each of the parameters. For averaging purposes, if a parameter is detected at a concentration less than the analyzing laboratory's method detection limit, a value equal to half the method detection limit reported by the laboratory should be used. For sample values that fall between the method detection level and the reporting level (i.e., a confirmed detection but below the level that cannot be reliably quantified), a value equivalent to half the reporting level reported by the analyzing laboratory should be used. These averages must then be compared to the benchmark values listed in Table 7-1. If Pratt & Whitney fails to collect a sample during an entire semiannual benchmark monitoring period, monitoring results from preceding semiannual periods cannot be used for averaging purposes.

### 7.8.1 Data Not Exceeding Benchmarks

If the average of the four most recent consecutive semiannual monitoring results for any parameter is less than or equal to the benchmarks, Pratt & Whitney can discontinue monitoring for that parameter for a maximum of two (2) years. An exemption for sample pH cannot be earned until exemptions for all other parameters are met. Once Pratt & Whitney is able to discontinue monitoring for all parameters, CT DEEP should be notified of the change of monitoring frequency by email at [DEEP.StormwaterIndustrial@ct.gov](mailto:DEEP.StormwaterIndustrial@ct.gov).

### 7.8.2 Data Exceeding Benchmarks

An exceedance occurs for a parameter if the average of four (4) consecutive semiannual monitoring values exceeds the benchmark threshold, or if fewer than four (4) samples have been collected but a but a single sample exceeds the benchmark threshold by more than four (4) times that parameter's threshold.

In the case of an exceedance, Pratt & Whitney must follow the corrective action schedule outlined in Section 8.3 of this Plan. Failure to conduct any required corrective actions after a benchmark exceedance occurs is a permit violation.

### 7.8.3 Off-Site Pollutant Levels

Following the first four (4) semiannual events of benchmark monitoring (or sooner if the exceedance is triggered by less than four (4) monitoring events), if the average concentration of a pollutant exceeds a benchmark value, and Pratt & Whitney determines that exceedance of the benchmark is attributable solely to the presence of that pollutant in “run-on” entering from off-site, Pratt & Whitney is not required to perform corrective actions or additional benchmark monitoring provided all of the following conditions are met:

- The average concentration of the benchmark monitoring results is less than or equal to the pollutant concentration in “run-on” entering from off-site (Including changes in pH due to rainfall).
- Pratt & Whitney documents and maintains with this Plan the supporting rationale for concluding that benchmark exceedances are in fact attributable solely to “run-on” entering from off-site, including any supporting rationale or any data previously collected by them or others.
- Pratt & Whitney demonstrates that the diversion of off-site run-on containing these pollutant levels is infeasible through engineering analysis.
- Pratt & Whitney notifies CT DEEP’s Commissioner of the findings, and the Commissioner issues a written approval of the permittee’s documentation demonstrating that the benchmark exceedances are attributable solely to off-site pollutant levels.

### 7.8.4 Inability to Collect a Sample

If a benchmark monitoring sample could not be collected during an entire semiannual monitoring period, a Discharge Monitoring Report (DMR) should still be submitted as per Section 7.9.1 of this Plan. In such a case, Pratt & Whitney must indicate in NetDMR any failure to monitor during the regular reporting period with an explanation of the limitations restricting the collection of an appropriate sample. The appropriate No Data Indicator code from the GP should be included on the DMR. Documentation should also be maintained in Appendix M. Reasons may include the absence of a 72-hour period of dry weather, the absence of a rain event that produces a stormwater discharge, the absence of a discharge from a detention or retention basin, or adverse weather conditions preventing access to the stormwater discharge location. The timing of a rain event is not an acceptable reason to fail to sample unless it precludes the analysis of a parameter within the acceptable hold time specified by a laboratory.

## 7.9 Reporting and Record Retention

### 7.9.1 Benchmark Monitoring

Pratt & Whitney will submit DMRs until via email to [DEEP.StormwaterIndustrial@ct.gov](mailto:DEEP.StormwaterIndustrial@ct.gov) until the Notice of Coverage is received by CT DEEP's Commissioner. Following this, DMRs must be submitted to CT DEEP via NetDMR. Stormwater DMR forms must be submitted no later than 30 days after the end of the monitoring period. Aquatic toxicity testing results should be submitted in NetDMR along with the corresponding semiannual results.

#### 7.9.2 Annual Report

An Annual Report summarizing monitoring data, site inspections, visual assessments, corrective actions, and noncompliance during the previous calendar year must be submitted to CT DEEP by April 15<sup>th</sup> of each year. A template for the Annual Report will be included in Appendix P, Annual Report Template. The Annual Report shall be submitted via email to [DEEP.StormwaterIndustrial@ct.gov](mailto:DEEP.StormwaterIndustrial@ct.gov).

#### 7.9.3 Records Retention

All records pertaining to stormwater monitoring activities including submitted DMR forms, laboratory reports, field data collection forms, and visual assessment records will be kept in the PPT Leader's office area and retained for at least five (5) years beyond the expiration date of the GP.

#### 7.9.4 Permit Noncompliance

Any incidences of GP noncompliance should be recorded. If there is an incidence of noncompliance that constitutes a permit violation, Pratt & Whitney should notify CT DEEP's Commissioner via the Online Noncompliance Reporting web-based platform.

## **8. CORRECTIVE ACTIONS**

### **8.1 Conditions Requiring Corrective Actions**

When conditions requiring corrective actions occur or are detected through inspections, monitoring or other means, Pratt & Whitney must take the appropriate corrective actions. Failure to take corrective action is a violation of the GP. All corrective action documentation should be maintained in Appendix J, Corrective Action Measure Documentation. The form in Appendix J should be filled out for any of the following conditions which require corrective actions:

- A discharge or representative discharge exceeds an applicable benchmark threshold in Table 7-1 after four consecutive semiannual measurements (or is mathematically certain to do so after less than four measurements)
- A discharge is inconsistent with the assumptions and requirements of an Applicable TMDL and its Wasteload Allocation
- A spill, leak, release, or discharge of non-stormwater not authorized by the GP or another permit
- A required control measure is not stringent enough for a stormwater discharge to be controlled as necessary such that the receiving water will meet applicable water quality standards
- A required control measure was never designed, installed, implemented, or maintained
- Construction or a change in design, operation, or maintenance at the Site occurs that significantly changes the nature or quantity of pollutants discharged
- Color, odor, floating solids, settled solids, suspended solids, or foam observed in discharge water
- CT DEEP's Commissioner may utilize enforcement discretion to require additional corrective actions in response to permit violations

The specific corrective action requirements for each of the above conditions are laid out in GP Section 4.6.

### **8.2 Corrective Action Schedule**

When Corrective Action Measures (CAMs) are necessary, they must be taken according to the following schedule. If corrective actions result in changes to any of the controls or procedures documented in this Plan, Pratt & Whitney must modify this Plan accordingly within fourteen (14) calendar days of completing corrective action work.

### 8.2.1 Immediate Actions (Within 1-2 Days)

If corrective action is needed, the permittee must immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.

### 8.2.2 Subsequent Actions (Within 14-60 Days)

If additional actions are necessary (e.g., installing a new or modified control measure or completing a repair), they must be completed before the next storm event, if possible, and within fourteen (14) calendar days from the time of discovery of the corrective action condition.

If it is not feasible to complete the corrective action within fourteen (14) calendar days, Pratt & Whitney must document the reason why. They must also identify a schedule for completing the work, which must be done as soon as practicable and but no longer than sixty (60) days after discovery. Documentation must be maintained within Appendix J of this Plan.

### 8.2.3 Extension (Greater than 60 Days)

If the completion of corrective actions will exceed the 60-day timeframe, Pratt & Whitney must document their intention to exceed 60 days, the rationale for an extension, and a completion date. Documentation must be maintained within Appendix J of this Plan.

If a structural control measure is needed for a level 3 corrective action measure, Pratt & Whitney may take up to one-hundred and twenty (120) days to install such measures. Any extension beyond this must be obtained from CT DEEP's Commissioner.

### 8.2.4 Follow-Up Sampling

For those corrective action triggering conditions that require or recommend follow-up sampling, Pratt & Whitney will have an additional thirty (30) calendar days (or until the next qualifying storm event, should none occur within thirty (30) calendar days) after implementing CAM Level 1, 2, or 3 to collect the follow-up sample. Once sampling results are received, the results must report be reported by email to [DEEP.StormwaterIndustrial@ct.gov](mailto:DEEP.StormwaterIndustrial@ct.gov) within thirty (30) days.

## 8.3 CAM Levels

Pratt & Whitney must enact the following corrective action measures when a corrective action triggering condition occurs. Corrective actions should follow the schedule above, and should be documented in Appendix J.

### 8.3.1 CAM Level 1: Review SWPPP and Stormwater Control Measures

Immediately review this Plan and the selection, design, installation, and implementation of the stormwater control measures to ensure the effectiveness of existing measures and determine if modifications are necessary to meet GP conditions. After the review, Pratt & Whitney must either:

- Implement additional measures, considering good engineering practices, that would reasonably be expected to address the triggering condition; or,
- Determine nothing further needs to be done and document their rationale and include relevant information in this Plan as to why they expect the existing control measures and best management practices to be sufficient to meet permit requirements.

If subsequent inspections and/or follow-up monitoring data indicate that the triggering condition persists after the steps taken for CAM Level 1, CAM Level 2 is initiated.

### 8.3.2 CAM Level 2: SWPPP Review and Additional Stormwater Control Measures

Review this Plan again and implement additional pollution prevention/good housekeeping stormwater control measures beyond those already in place. Subsequent control measures should consider good engineering practices, beyond what was done in the initial response, that would reasonably be expected to be expected to control the release of pollutants.

If subsequent inspections and/or follow-up monitoring data indicate that the triggering condition persists for a third time after the steps taken for CAM Level 2, CAM Level 3 is initiated.

### 8.3.3 CAM Level 3: Implementation of Structural Control Measures

Install structural source controls (e.g., permanent controls such as permanent cover, berms, and secondary containment), and/or treatment controls (e.g., sand filters, hydrodynamic separators, oil-water separators, retention ponds, and infiltration structures, where applicable). The control measures, treatment technologies, or treatment train should be appropriate for the pollutants that triggered a CAM Level 3 should be more rigorous than the pollution prevention/good housekeeping-type stormwater control measures implemented under Level 2.

Pratt & Whitney must select controls with pollutant removal efficiencies that are sufficient to prevent or minimize pollution of stormwater. Pratt & Whitney must install such stormwater control measures for the discharge point(s) in question and for any discharge point represented by this point, unless they individually monitor those discharge points and demonstrates that Level 3 requirements are not required at those discharge points.

If the issue is still not resolved after CAM Level 3 actions, and further corrective actions are infeasible, Pratt & Whitney may request a waiver from further corrective actions and/or follow-up monitoring. CT DEEP's commissioner will approve or deny the request and may notify Pratt & Whitney that coverage under an individual permit is necessary.

## **9. AMENDMENT AND DISTRIBUTION OF THE PLAN**

In accordance with conditions of the GP, this Plan must be amended under the any of the following conditions:

- There is a change at the Site which has an effect on the potential to cause pollution of the surface waters of the state.
- The actions required by this Plan fail to ensure or adequately protect against pollution of the surface waters of the state.
- CT DEEP's Commissioner requests modification of this Plan.
- Pratt & Whitney is notified that it is subject to requirements because the receiving water to which the industrial activity discharges has been designated as impaired under Section 303(d) of the Clean Water Act and as identified in the most recent State of Connecticut Integrated Water Quality Report.
- Pratt & Whitney is notified that a TMDL to which they are subject has been established for the receiving water to which the stormwater discharges.
- It is necessary to address any significant sources or potential sources of pollution identified as a result of any inspection or visual assessment.
- Amendment is required due to failure to meet the monitoring benchmarks of the GP.

This Plan must be amended, and all actions required by this Plan must be completed within 120 days (or within another interval as may be specified in the GP or as may be approved in writing by CT DEEP's Commissioner) of the date Pratt & Whitney becomes aware or should have become aware that any of the conditions listed above has occurred. Any changes to this Plan should be recorded on Appendix Q, Record of Review Form.

### **9.1 Recertification of this Plan**

If significant changes are made to the Site or to this Plan in accordance with the conditions for amendment of this Plan listed in Section 8 above, this Plan must be recertified in accordance with the "Non-Stormwater Discharges" and "Plan Certification" sections of the GP, by a Qualified Professional as defined in the GP. Pratt & Whitney must maintain compliance with such Plan thereafter.

### **9.2 Distribution of this Plan**

An up-to-date copy of this Plan is maintained by the PPT Leader and accessible to key management, supervisors, and Members of the PPT.

### 9.3 **Plan Availability**

According to the GP, Section 3.12.1, Pratt & Whitney must make a copy of their registration under the GP available electronically on their official website for public review. If available, on or before thirty (30) days of receipt of a registration and this Plan, CT DEEP's Commissioner shall post this Plan on the CT DEEP website for public review and comment. If Pratt & Whitney claims that certain elements of this Plan constitute a trade secret or are otherwise exempt from the disclosure requirements of the state Freedom of Information Act (FOIA) (Section 1-210 et Seq of the Connecticut General Statutes), Pratt & Whitney must follow the procedures provided in the GP registration form instructions regarding information subject to FOIA requirements.

## **TABLES**

**TABLE 4-1 DRAINAGE AREA SUMMARY**

<b>Sequential Number &amp; Descriptor</b>	<b>Drainage Area General Description</b>	<b>Receiving Waterbody</b>	<b>Outfall Identifier</b>	<b>Location of Discharge Point</b>	<b>Location of Sampling Point</b>	<b>Estimate of Runoff Coefficient of Drainage Area</b>
001 - South Central Area	B-110, B-130, B-140, B-150 and surrounding outside areas	Connecticut River	SW001	72-inch concrete pipe along Connecticut River, west of SW005	Major non-contact cooling water outfall: Sample collected at B96 with autosampler	0.75
003 - Southern Area	B-91, B-94 and surrounding outside areas, former ECM Landfill	Tributary to Connecticut River	SW003	48-inch concrete pipe to Tributary to Connecticut River	N/A: No industrial activity in area	0.10
005 - Southeastern Area	Area East of B-150	Connecticut River	SW005	30-inch plastic pipe just south of Connecticut River pier, (prior to boat launch)	Same as discharge point	0.37
006 - Eastern Area	B-310, B-330 and surrounding outside areas	Connecticut River	SW006	28-inch metal pipe, ultimately drains to Connecticut River north of river pier	Sample collected from south end of swale near 370 prior to crossing the road	0.26
007 - Central Area	B-220, other smaller buildings, and surrounding outside areas	Dart Brook	SW007	72-inch metal culvert at lower end of Dart Brook	Sample collected from area adjacent to culvert entry point (west side of road N)	0.24
008 - Northern Area	B-410, B-435 and surrounding outside areas	Tributary to Connecticut River	SW008	54-inch metal pipe into tributary to Connecticut River	Sample collected from culvert on north side of Road E	0.10

**TABLE 4-2 INVENTORY OF EXPOSED MATERIALS**

<b>Drainage Area, Outfall(s) Affected by Potential Spills or Leaks</b>	<b>Location of Potential Pollutant Source</b>	<b>Activity Generating Potential Pollutant</b>	<b>Pollutants Associated With Source</b>	<b>Method of Storage/ Extent of Exposure</b>	<b>Control Measures and Method of Disposal, if Applicable</b>
Outdoor Material Storage					
001, SW001; 007, SW007	B-110 North Side	Wood, Metal	TSS, metals, oils/grease	Outdoor Material Storage	Monthly Inspections
001, SW001; 007, SW007	B-110 Northwest Corner	Wood, Metal	TSS, metals, oils/grease	Outdoor Material Storage	Monthly Inspections
005, SW005	B-150 East End	Metal, Fiberglass boxes, Wood boxes, Powered Industrial Vehicles	TSS	Outdoor Material Storage	Monthly Inspections
005, SW005	B-150 Northeast Corner	Wood, Metal	TSS, metals, oils	Outdoor Material Storage	Monthly Inspections
005, SW005; 001, SW001	B-155	Wood	TSS	Outdoor Material Storage	Monthly Inspections
005, SW005	Lot South of Road C	Wood, Plastic, Fiberglass boxes, Engine Fixtures, Engine Parts, Metal, Machinery	TSS, metals, oils,	Outdoor Material Storage	Monthly Inspections
007, SW007	B-230 East Side	Wood, Metal	TSS, metals, oil	Outdoor Material Storage	Monthly Inspections
007, SW007	B-220 Northeast Corner (by B-250)	Fiberglass parts boxes, Wood pallets, Wood boxes, Steel	TSS, metal, oils	Outdoor Material Storage	Monthly Inspections
007, SW007	B-220A North Storage Lot	Fiberglass parts boxes, Wood pallets, Wood boxes, Steel	TSS, metal, oils	Outdoor Material Storage	Monthly Inspections
007, SW007	B-220A Northeast Corner	Jet Engines, Engine Fixtures	TSS, metals, oil	Outdoor Material Storage	Monthly Inspections
007, SW007	B-220A Northwest Corner	Fiberglass parts boxes, Wood pallets, Wood boxes, Steel	TSS, metals, oil	Outdoor Material Storage	Monthly Inspections

<b>Drainage Area, Outfall(s) Affected by Potential Spills or Leaks</b>	<b>Location of Potential Pollutant Source</b>	<b>Activity Generating Potential Pollutant</b>	<b>Pollutants Associated With Source</b>	<b>Method of Storage/ Extent of Exposure</b>	<b>Control Measures and Method of Disposal, if Applicable</b>
007, SW007	Lot East Side of Road L	Wood, Metal	TSS,, metals	Outdoor Material Storage	Monthly Inspections
007, SW007	B-250 Lot North of Building	Wood, Fiberglass boxes, Metal, Plastic	Metals, TSS, oils	Outdoor Material Storage	Monthly Inspections
007, SW007	B-280 East Side	Metal, Wood	Metal, TSSs	Outdoor Material Storage	Monthly Inspections
007, SW007	B-310 Northwest	Metal	Metals	Outdoor Material Storage	Monthly Inspections
006, SW006	B-340 South Side	Wood, Fiberglass part boxes, Metal	TSS, metals, oil	Outdoor Material Storage	Monthly Inspections
006, SW006	B-362 Railroad Siding	Concrete, Metal, Wood, Plastic, Light Towers	TSS, metals	Outdoor Material Storage	Monthly Inspections
007, SW007	B-400 North End	Metal containers, Plastic containers	TSS, metals	Outdoor Material Storage	Monthly Inspections
007, SW007	B-406 Road E Storage Lot	Jet Engines, Engine Fixtures, Engine Cradles, Metals, Wood, Fiberglass	TSS	Outdoor Material Storage	Monthly Inspections
007, SW007; 008, SW008	B-410 East – Storage Lot Along Road E	Engine slings, Engine ducts, Wood boxes, Fiberglass fixtures	TSS,	Outdoor Material Storage	Monthly Inspections
008, SW008	B-410 Northwest Lot	Wood boxes, Engine parts, Fiberglass boxes, Metal	TSS, metals, oil and grease	Outdoor Material Storage	Monthly Inspections
008, SW008	B-410 North Side (Road T)	Wood Boxes, Jet Engines, Engine Parts, Engine Fixtures, Wood, Fiberglass Fixtures, Metal	TSS, metals, oil and grease	Outdoor Material Storage	Monthly Inspections
008, SW008	B-410 West Side (Road T)	Wood Boxes, Jet Engines, Engine Parts, Engine Fixtures, Wood, Fiberglass Fixtures, Metal	TSS, metals, oil and grease	Outdoor Material Storage	Monthly Inspections
007, SW007	B-425 North End	Wood boxes, Fiberglass boxes	TSS	Outdoor Material Storage	Monthly Inspections
007, SW007; 008, SW008	B-440	Wood boxes, Fiberglass boxes, Plastic, Metal	TSS, metals, oil and grease	Outdoor Material Storage	Monthly Inspections

<b>Drainage Area, Outfall(s) Affected by Potential Spills or Leaks</b>	<b>Location of Potential Pollutant Source</b>	<b>Activity Generating Potential Pollutant</b>	<b>Pollutants Associated With Source</b>	<b>Method of Storage/ Extent of Exposure</b>	<b>Control Measures and Method of Disposal, if Applicable</b>
Waste Storage					
007, SW007	B-250	Roll-off storage	TSS, oils grease, foods, etc	Storage building can hold up to 12 roll-offs	Roll-offs are stored under a roof, concrete floor directs liquids into six interconnected sumps with approximately 360 gallons total capacity. Waste disposed of as-needed (typically weekly)
Various	Site	Approximately 0-10 dumpsters, in various sizes, are located throughout the facility, typically for construction debris. Dumpsters may be relocated as requirements change. They are typically located outside and are covered when not in use. Figure 2 depicts the typical locations for refuse containers	Mostly TSS	Outdoor Material Storage	Monthly Inspections, waste disposed of as-needed (typically monthly)
Outdoor Oil and Chemical Storage					
005, SW005	B-94	Fuel storage and transfer (Generator)	Diesel Fuel	1 250-gal AST	Double wall, whistle, and gauge
005, SW005	B-97	Fuel storage and transfer (Seasonal for snowplow fuel)	Diesel Fuel	1 1,000-gal AST	Double wall, level gauge
007, SW007	B-105	Fuel storage and transfer (Fire Pump)	Diesel Fuel	1 280-gal AST	Double wall, whistle, and gauge
001, SW001	B-110	Fuel storage and transfer (Generator)	Diesel Fuel	1 120-gal AST	Double wall, whistle, and gauge
007, SW007	B-130	Fuel storage and transfer (Generator) (Free Standing Cube Tank)	Diesel Fuel	1 120-gal AST	Double wall, whistle, and gauge
007, SW007	B-130	Fuel storage and transfer (Generator)	Diesel Fuel	1 250-gal AST	Double wall, whistle, and level gauge

<b>Drainage Area, Outfall(s) Affected by Potential Spills or Leaks</b>	<b>Location of Potential Pollutant Source</b>	<b>Activity Generating Potential Pollutant</b>	<b>Pollutants Associated With Source</b>	<b>Method of Storage/ Extent of Exposure</b>	<b>Control Measures and Method of Disposal, if Applicable</b>
007, SW007	B-130	Fuel storage and transfer (Generator)	Diesel Fuel	1 255-gal AST	Double wall, whistle, and level gauge
005, SW005	B-150	Fuel storage and transfer (Generator)	Diesel Fuel	1 250-gal AST	Double wall, whistle, and level gauge
007, SW007	B-230 North	Fuel storage and transfer (Generator)	Diesel Fuel	1 350-gal AST	Double wall, rupture switch, gauge level, spill containment box, overfill prevention valve, high fuel switch, high fuel alarm
006, SW006	B-310	Fuel storage and transfer	#2 Fuel Oil	2 30,000-gal ASTs	Roofed concrete dike (64,837 gal capacity), level indicator
006, SW006	B-310	Fuel storage and transfer, vehicle fueling	Diesel Fuel	1 2,000-gal AST	Roofed concrete dike (5,872 gal capacity), level indicator
006, SW006	B-310	Fuel storage and transfer, vehicle fueling	Gasoline Unleaded	1 4,000-gal AST	Tank is enclosed in a concrete box (>4,000 gal capacity), level indicator, and interstitial monitoring. Fill pipe in containment area.
006, SW006	B-310	Fuel storage and transfer (Generator)	Diesel Fuel	1 400-gal AST	Double wall, whistle, and gauge
006, SW006	B-310	Fuel storage and transfer	Aqua Ammonia	1 2,000-gal AST	Tank located inside containment that can contain the full volume of the tank..
006, SW006	B-331	Fuel storage and transfer	Jet Fuel	2 30,000-gal ASTs	Fully enclosed steel containment dike (64,837-gal capacity), high level alarm, digital level indicator, remote fill port (use 2 radios for direct communication)
006, SW006	B-331	Fuel storage and transfer	Salvage Jet Fuel	1 65-gal AST	Roofed concrete dike (135 gal capacity), level indicator
006, SW006	B-331	Fuel storage and transfer	Used Oil	1 55-gal AST	Roofed concrete dike (60 gal capacity), level indicator
006, SW006	B-331	Fuel storage and transfer	Fuel	1 6,000-gal AST	Double wall, located within concrete containment, mechanical tank level gauge, float level switches

<b>Drainage Area, Outfall(s) Affected by Potential Spills or Leaks</b>	<b>Location of Potential Pollutant Source</b>	<b>Activity Generating Potential Pollutant</b>	<b>Pollutants Associated With Source</b>	<b>Method of Storage/ Extent of Exposure</b>	<b>Control Measures and Method of Disposal, if Applicable</b>
006, SW006	B-345	Fuel storage and transfer (Fire pump)	Diesel Fuel	1 280-gal AST	Double wall, whistle, and gauge
007, SW007	B-413, Tank Farm	Fuel storage and transfer	Jet Fuel	3 316,651-gal ASTs	Concrete dike (471,408 gal capacity) underlain by a membrane impervious to jet fuel. Discharge from the diked area is passed through an oil/water separator and discharged manually following a visual inspection. The off-loading pad for the jet fuel tanks is connected to an 8,000 gallon capacity concrete sump located inside the containment area. There is a valve that prevents storm water from entering the sump.
007, SW007	B-413, Tank Farm	Fuel storage and transfer	Preservation Oil	1 10,000-gal AST	
007, SW007	B-413, Tank Farm	Fuel storage and transfer	Salvage Fuel	1 10,000-gal AST	
008, SW008	B-435	Fuel storage and transfer (Generator)	Diesel Fuel	1 500-gal AST	Double wall, whistle, and gauge
008, SW008	B-465	Fuel storage and transfer (Generator)	Diesel Fuel	1 250-gal AST	Double wall, whistle, and gauge
008, SW008	B-465	Transformer	Insulating Oil	2 256-gal transformers	Spill response and inspection program
007, SW007	B-210	Transformer	Insulating Oil	2 6,211-gal transformers	Spill response and inspection program
007, SW007	B-210	Tap Changer	Insulating Oil	2 360-gal tap changers	Spill response and inspection program
007, SW007	B-210	Circuit Breaker	Insulating Oil	6 580-gal circuit breakers	Spill response and inspection program

Drainage Area, Outfall(s) Affected by Potential Spills or Leaks	Location of Potential Pollutant Source	Activity Generating Potential Pollutant	Pollutants Associated With Source	Method of Storage/ Extent of Exposure	Control Measures and Method of Disposal, if Applicable
Material Loading and Unloading					
007, SW007	B-400 and B-403	Hazardous waste loading/loading	TSS, oils, chemicals, metals	Waste loading/unloading	Waste storage is indoors, both buildings have secondary containment to prevent any spills from leaving the building. Waste disposed of as-needed.
005, SW005	B-91	Non-bulk transfer (fork truck)	Sodium Hydroxide, Sulfuric Acid,	Loading area	Sodium Hydroxide tanks are located inside the building on a containment pallet. Sulfuric Acid is located inside the building on a containment pallet.
001, SW001	B-110	Non-bulk transfer (fork truck)	Mostly oils and some chemicals, other materials such as products or shipping materials	Loading area	Follow good spill prevention practices while loading
005, SW005	B-150	Non-bulk transfer (fork truck) Bulk transfers	Mostly oils and some chemicals, some pumps outs of wastewaters	Loading area	Follow good spill prevention practices while loading. Oil-water separator in catch basin.
005, SW005	B-170, Receiving Well	Transfer of bags, drums, cans, carboys, totes	Assorted chemicals and oils	Loading area	Building 170 is totally enclosed, contains 5 interconnected sumps with a total capacity of 2,425 gallons. Floor is chemically coated. Unloading dock contains pressure sensitive valve to prevent release of materials from catch basin during transfer operations. Sealed concrete floor inside building.
007, SW007	B-220, Receiving Well	Chemical transfer	All chemicals except for acids, alkalis, oils, solvents, gas cylinders	Loading area	Shipping & Receiving Area is under cover. The floor is concrete and sloped back.
007, SW007	B-220, Chip Well	Transfer of 55-gallon drums, and roll-offs	Metal Chips, Turnings, Used Soluble Oil	Loading area	Located under cover and sloped back to a common collection point.
006, SW006	B-310	Transfer of drums, tanks	Boiler Treatment chemicals (alkalis, polymers, oxygen, oxygen scavenger)	Loading area	Sealed concrete floor inside building.

<b>Drainage Area, Outfall(s) Affected by Potential Spills or Leaks</b>	<b>Location of Potential Pollutant Source</b>	<b>Activity Generating Potential Pollutant</b>	<b>Pollutants Associated With Source</b>	<b>Method of Storage/ Extent of Exposure</b>	<b>Control Measures and Method of Disposal, if Applicable</b>
006, SW006	B-331	Bulk and non-bulk transfers	Oils, jet fuel, other chemicals	Loading area	Loaded in containment or covered areas
008, SW008	B-410, Test Cells 1-8, Service Rooms	Transfer of 55-gallon drums	Various Oils	Loading area	Oil is transferred from barrels placed in containment by fork truck to storage tank located inside service rooms. Stored inside Safety Stor building with containment.
008, SW008	B-410, Outside Service Rooms	Transfer of 55-gallon drums	Engine Preservation Oil	Loading area	Inside plastic covered containment shed
008, SW008	B-435	Transfer of 15 gallon carboys	Sodium Hypochlorite, Polyphosphate	Loading area	Sealed concrete floor inside building. Note that the material is transferred from the carboys into the holding tanks.
008, SW008	B-440	Scrap metals	Metals	Loading area	Trucks off-loading in the back with a covered area
Roof Areas with Vents/Stacks					
001, SW001	B-150	Roof vents	Oils and grease	Roof vents distributed across building roof	Maintenance as needed
007, SW007	B-220	Roof vents	Oils and grease	Roof vents distributed across building roof	Maintenance as needed
Other					
001, SW001	B-150, South Side	Baghouses	Dust and debris, potential for chromium	Covered baghouse drums	Drums disposed of when full
005, SW005	B-150, East Side	Baghouses	Dust and debris, potential for chromium	Covered baghouse drums	Drums disposed of when full
007, SW007	B-220, North Side	Baghouses	Dust and debris, potential for chromium	Covered baghouse drums	Drums disposed of when full
007, SW007	B-220, West Side	Baghouse	Dust and debris, potential for chromium	Covered baghouse drums	Drums disposed of when full
005, SW005	B-97	Salt Storage	Salts and TSS	Stored in covered area	Area cleaned as necessary

**TABLE 4-3 OIL AND TOXIC/HAZARDOUS SUBSTANCE TRANSFER METHODS**

<b>Principal Transfer Methods</b>	<b>Types of Containers</b>	<b>State (New or Waste)</b>	<b>Release Prevention Provisions</b>	<b>Risk of Release</b>
Fork Truck	Drums (55-gallon or less)	Liquids	Typically drums are centered & strapped on pallets or single drum attachments are used if drums are not palletized.	Low
	Drums or bags	Solids	Typically drums are centered & strapped on pallets or single drum attachments are used if drums are not palletized; bags are typically centered & centered on pallets.	Low
	Gas Cylinders	Gases	Gas cylinder racks with chains are used to prevent cylinders from tipping over.	Low
	Portable tanks (200 – 330-gallon)	Liquids	Fork trucks are used to transport the tanks. Tanks are kept at a minimal elevation above the ground.	Low
Hand trucks, tricycle carts, motorized carts, dollies	One 55-gallon drum or numerous smaller containers	Liquids	Typically containers are strapped.	Low
	One bag or numerous smaller containers	Solids	Typically containers are strapped.	Low
	One gas cylinder	Gases	Typically containers are strapped.	Low
Manual	Containers of 5 gallons or smaller	Liquids	These containers are safety cans with spring-loaded lids.	Low
Tank Carts	N/A	Liquids		Medium
Tanker Truck	N/A	Liquids	Two people typically monitor transfers. The tank is measured prior to delivery to ensure adequate freeboard. Most tanks are equipped with level indicators. Any catch basins in close proximity to the transfer site are covered with a chemical resistant mat. Manual shut-off valves on trucks can be used to stop the flow if a leak or overflow occurs.	Low
Pipelines	N/A	Liquids or Gases	Sections in the pipeline are isolated in the event of a leakage.	Low
Portable Fuel Tank – Pick-up truck Bed	91-gallon portable fuel tank	Liquid	Employee transfers fuel from diesel fuel storage tank at Powerhouse to emergency generator tanks.	Medium

**TABLE 5-1 OIL/WATER SEPARATORS AND SUMPS**

<b>Building</b>	<b>Location</b>	<b>Description</b>	<b>Total Capacity (gal)</b>	<b>Best Management Practices</b>	<b>Discharge</b>	<b>Drainage Area, Outfall Affected by Potential Spills or Leaks</b>
B-110	Underground	Grease Trap (Underground)	200	Inspection and maintenance	Stormwater	001, SW001
B-150	Underground	Water/Oil Separator	1,500	Inspection and maintenance	Stormwater	005, SW005
B-310/B-280	Underground	Water/Oil Separator	1,200	Inspection and maintenance	Stormwater	001, SW001
B-330	Underground	Water/ Jet Fuel Separator (Inactive)	5,360	Inspection and maintenance	Stormwater	006, SW006
B-331	Underground	Water/Jet Fuel Separator	7,000	Inspection and maintenance	Stormwater	006, SW006
B-331	Underground	Water/Jet Fuel Separator	9,300	Inspection and maintenance	Stormwater	006, SW006
B-331	Underground	Water/Jet Separator (inside compressor room)	1,185	Inspection and maintenance	Stormwater	006, SW006
B-340	Underground	Water/Jet Separator	2,500	Inspection and maintenance	Stormwater	006, SW006
B-413, Tank Farm	Aboveground	Water/Jet Fuel Separator (Steel tank with inclined plates)	500	High level alarm, inside tank farm containment, inspection, and maintenance	Stormwater	008, SW008

**TABLE 7-1 SUMMARY OF SECTOR AB MONITORING REQUIREMENTS**

All Monitoring Requirements for Sector AB (Transportation Equipment, Industrial or Commercial Machinery Facilities)				
MONITORING TYPE	INDUSTRIAL ACTIVITY	SCHEDULE	PARAMETER	THRESHOLD OR LIMIT
BENCHMARK GP, Section 4.5.1	Applies to all Sector AB facilities	Semiannually until requirements for benchmark monitoring exemption are met <sup>1</sup>	Chemical Oxygen Demand (COD)	75 mg/L
			Total Oil and Grease (O&G)	5.0 mg/L
			pH	5.0 - 9.0 s.u.
			Total Suspended Solids (TSS)	90 mg/L
			Total Phosphorus (TP)	0.40 mg/L
			Total Kjeldahl Nitrogen (TKN)	2.30 mg/L
			Nitrate as Nitrogen (NO <sub>3</sub> -N)	1.10 mg/L
			Total Copper (Cu)	0.059 mg/L
			Total Lead (Pb)	0.076 mg/L
			Total Zinc (Zn)	0.160 mg/L
ADDITIONAL GP, Section 4.5.2	Applies to all Sector AB facilities	No additional monitoring for Sector AB		
EFFLUENT LIMITS GP, Section 4.5.3	Applies to all Sector AB facilities	No effluent limits for Sector AB		
AQUATIC TOXICITY GP, Section 4.5.4	Applies to all Sector AB facilities	Once in the permit term <sup>3</sup>	LC <sub>50</sub> for <i>Daphnia pulex</i>	None
			LC <sub>50</sub> for <i>Mysidopsis bahia</i>	
IMPAIRED WATERS GP, Section 4.5.5	Applies to all Sector AB facilities	Annually	Perfluorooctane sulfonate (PFOS) Polychlorinated biphenyls (PCBs) Escherichia coli (E. coli)	

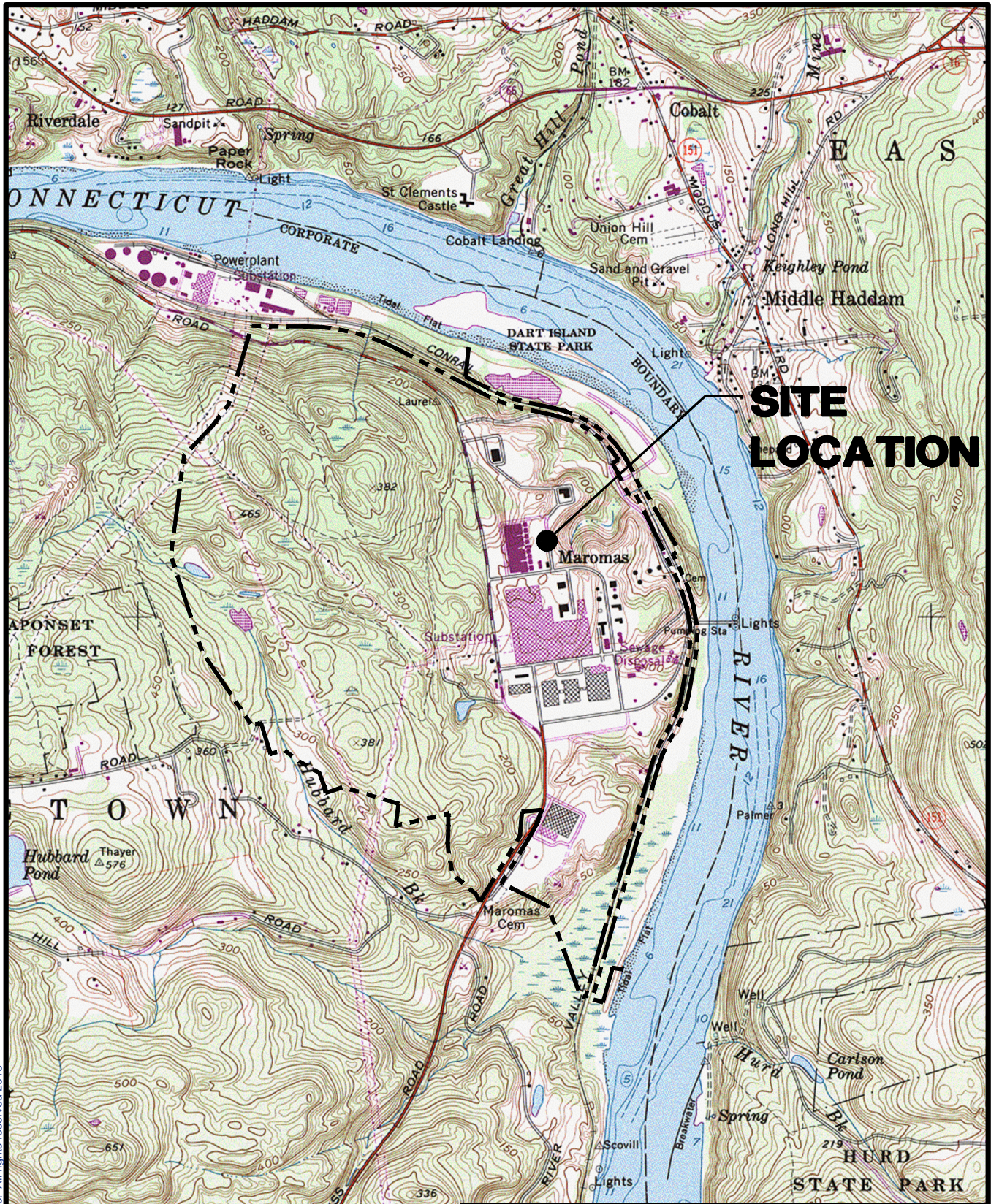
<sup>1</sup> Facilities may qualify for benchmark exemptions for a maximum of 2 years at a time (in addition to GP, Section 4.5.1).

<sup>2</sup> DEEP Water Quality Plans and Assessment Map: <https://portal.ct.gov/DEEP/Water/Water-Quality/Water-Quality-305b-Report-to-Congress>.

<sup>3</sup> Aquatic toxicity testing shall be performed in the first year after receiving the Notice of Coverage from CT DEEP's Commissioner and the results shall be reported in NetDMR.

**FIGURE 1**

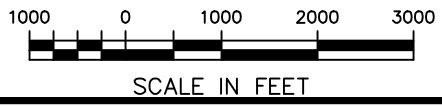
**USGS Site Location Map**



**SITE  
LOCATION**

**MAP REFERENCE:**

SECTION OF THE U.S.G.S. 7.5 MIN. TOPOGRAPHIC MAP OF MIDDLE HADDAM, 1961, PHOTOREVISED 1988. PROPERTY BOUNDARY SURVEY PROVIDED BY HALLISEY & HERBERT. LOCATION ON THIS MAP IS APPROXIMATE.



PRATT & WHITNEY, MIDDLETOWN, CONNECTICUT

SITE LOCATION MAP

Comm.No.  
68PQ704

FIGURE 1

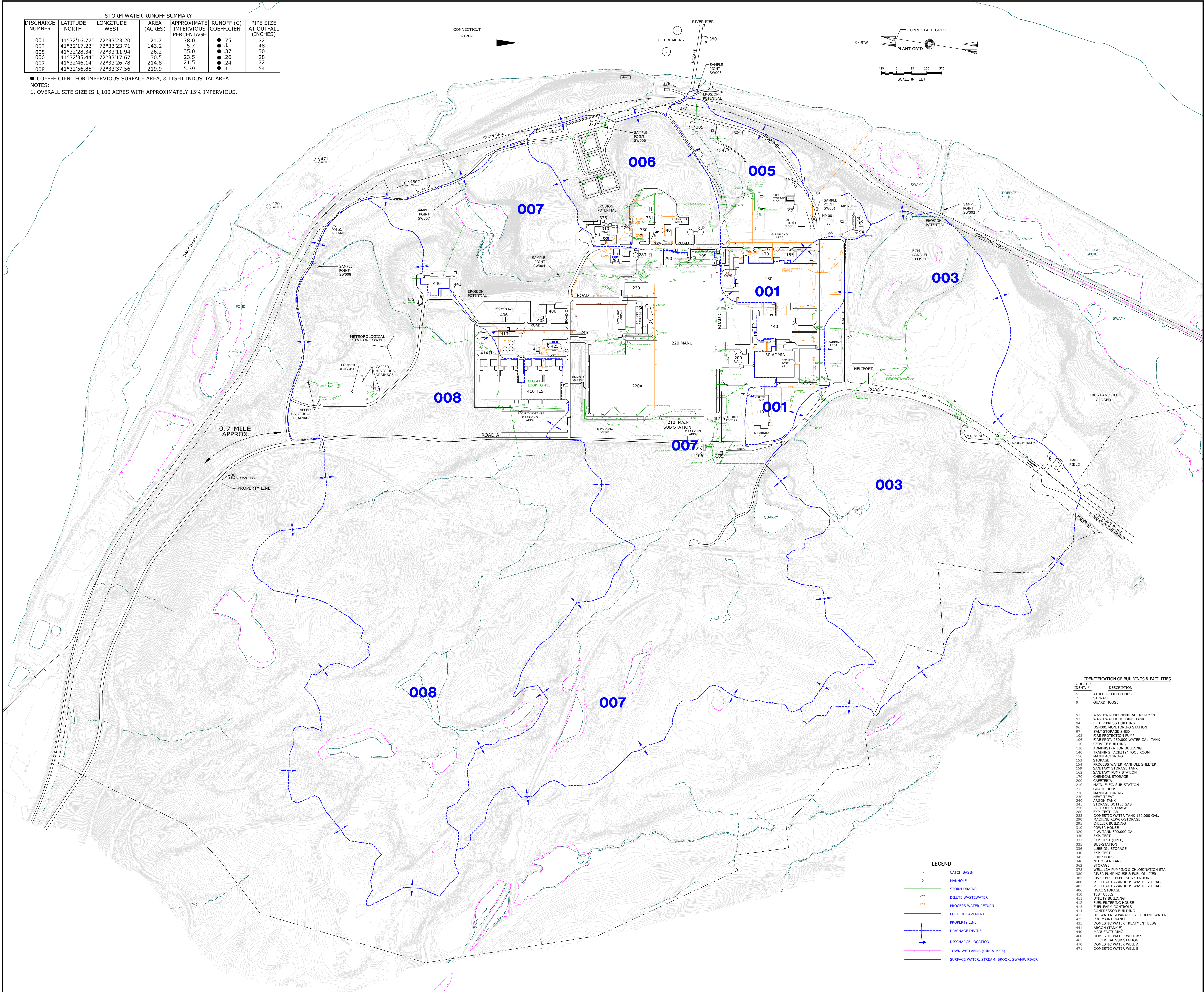


**DRAWING 1**

**Site Plan**

STORM WATER RUNOFF SUMMARY						
DISCHARGE NUMBER	LATITUDE NORTH	LONGITUDE WEST	AREA (ACRES)	APPROXIMATE IMPERVIOUS PERCENTAGE	RUNOFF (C) COEFFICIENT	PIPE SIZE AT OUTFALL (INCHES)
001	41°32'16.77"	72°33'23.20"	21.7	78.0	● .75	72
003	41°32'17.23"	72°33'23.71"	143.2	5.7	● .1	48
005	41°32'28.34"	72°33'11.94"	26.2	35.0	● .37	30
006	41°32'35.44"	72°33'17.67"	30.5	23.5	● .26	28
007	41°32'46.14"	72°33'26.78"	214.8	21.5	● .24	72
008	41°32'56.85"	72°33'37.56"	219.9	5.39	● .1	54

● COEFFICIENT FOR IMPERVIOUS SURFACE AREA, & LIGHT INDUSTRIAL AREA  
 NOTES:  
 1. OVERALL SITE SIZE IS 1,100 ACRES WITH APPROXIMATELY 15% IMPERVIOUS.



IDENTIFICATION OF BUILDINGS & FACILITIES	
BLDG. OR IDENT. #	DESCRIPTION
5	ATHLETIC FIELD HOUSE
7	STORAGE
9	GUARD HOUSE
91	WASTEWATER CHEMICAL TREATMENT
92	WASTEWATER HOLDING TANK
94	FILTER PRESS BUILDING
96	CONTROL MONITORING STATION
97	SALT STORAGE SHED
105	FIRE PROTECTION PUMP
106	FIRE PROT. 750,000 WATER GAL.-TANK
110	SERVICE BUILDING
130	ADMINISTRATION BUILDING
140	TRAINING FACILITY TOOL ROOM
150	MANUFACTURING
153	STORAGE
154	PROCESS WATER MANHOLE SHELTER
159	SANITARY STORAGE TANK
162	SANITARY PUMP STATION
170	CHEMICAL STORAGE
200	CAFETERIA
210	MAIN. ELEC. SUB-STATION
215	GUARD HOUSE
220	MANUFACTURING
230	HEAT TREAT
240	ARGON TANK
245	STORAGE BOTTLE GAS
250	ROLL OFF STORAGE
280	EXP. TEST LAB
283	DOMESTIC WATER TANK 150,000 GAL.
290	MACHINE REPAIR/STORAGE
295	CHILLER BUILDING
310	POWER HOUSE
320	P.W. TANK 500,000 GAL.
330	EXP. TEST
331	EXP. TEST (HPCL)
335	SUB-STATION
336	LUBE OIL STORAGE
340	EXP. TEST
345	PUMP HOUSE
346	NITROGEN TANK
378	STORAGE
380	WELL 13A PUMPING & CHLORINATION STA.
385	RIVER PUMP HOUSE & FUEL OIL PIER
400	RIVER PIER, ELEC. SUB-STATION
403	< 90 DAY HAZARDOUS WASTE STORAGE
403	< 90 DAY HAZARDOUS WASTE STORAGE
406	HVAC STORAGE
410	TEST CELLS
411	UTILITY BUILDING
412	FUEL FILTERING HOUSE
413	FUEL FARM CONTROLS
414	COMPRESSOR BUILDING
415	OIL WATER SEPARATOR / COOLING WATER
425	PGC MAINTENANCE
435	DOMESTIC WATER TREATMENT BLDG.
441	ARGON (TANK E)
440	MANUFACTURING
460	DOMESTIC WATER WELL #7
465	ELECTRICAL SUB-STATION
470	DOMESTIC WATER WELL A
471	DOMESTIC WATER WELL B

LEGEND	
○	CATCH BASIN
○	MANHOLE
—	STORM DRAINS
—	DILUTE WASTEWATER
—	PROCESS WATER RETURN
—	EDGE OF PAVEMENT
—	PROPERTY LINE
—	DRAINAGE DIVIDE
—	DISCHARGE LOCATION
—	TOWN WETLANDS (CIRCA 1996)
—	SURFACE WATER, STREAM, BROOK, SWAMP, RIVER

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SCALE <b>1" = 250'</b>	DATE <b>03/25/2026</b>
DRAWN BY <b>A.C.L.</b>	CHECKED BY <b>J.W.S.</b>
PROJECT NO. <b>68FCH97</b>	SHEET NO. <b>1</b>
PROJECT NAME <b>STORMWATER POLLUTION PREVENTION PLAN          1 AIRCRAFT ROAD, MIDDLETOWN, CONNECTICUT          PRATT &amp; WHITNEY MIDDLETOWN FACILITY</b>	NO. OF SHEETS <b>1</b>

**DRAWING 2**

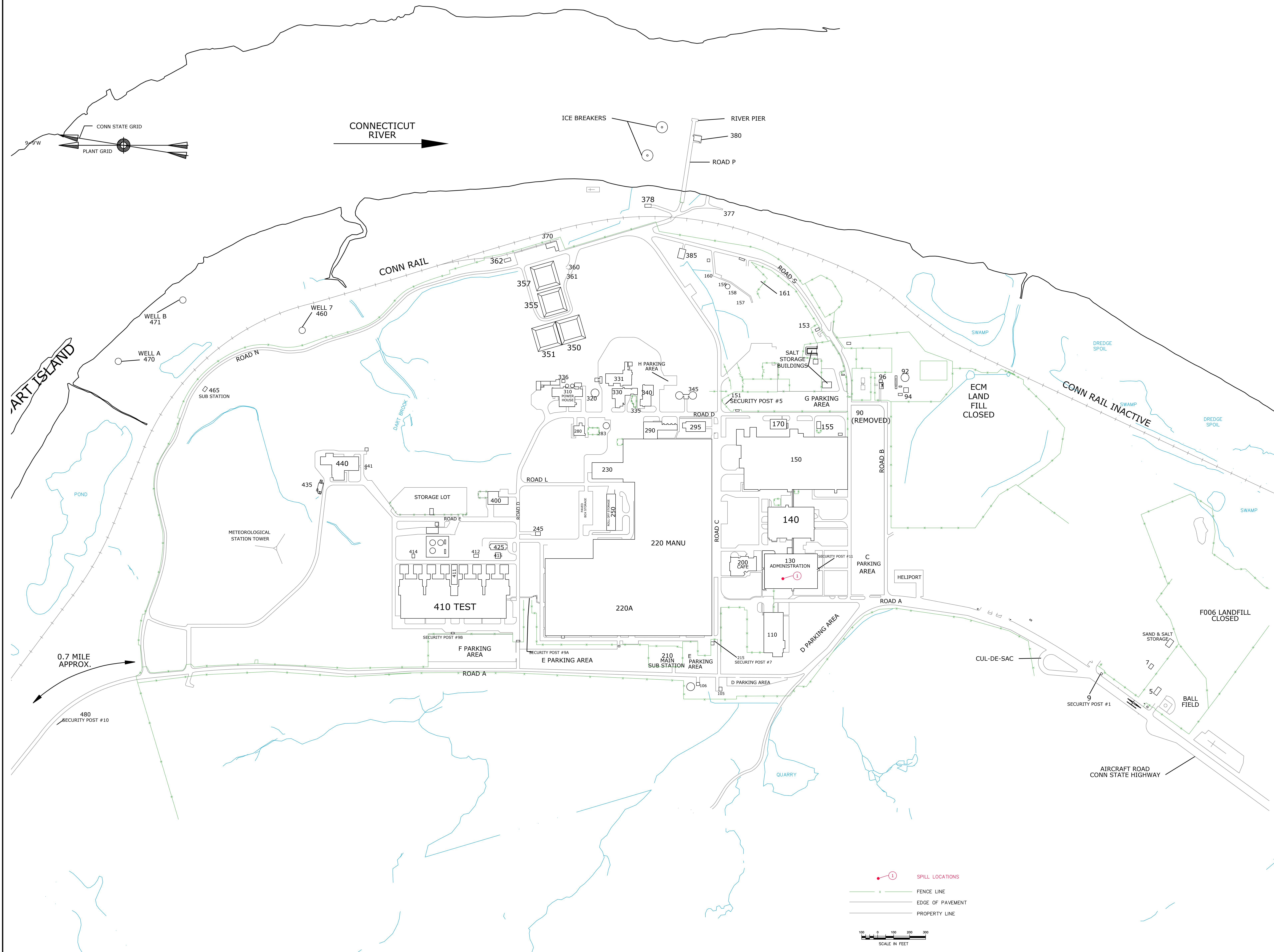
**Potential Pollutant Sources**



**DRAWING 3**

**Site Spill Locations**

Id. No.	Date of Spill	Site Location	Material	Quantity
NA	2/22/2023	Not Recorded	Gasoline	Unknown (gas tank leak)
NA	3/17/2023	Not Recorded	Jet fuel	Unknown (pin hole leak in line)
NA	9/17/2024	Not Recorded	Diesel fuel	2 gal
1	3/1/2025	Roof of B130	Hydraulic oil	5-8 gal



<b>1</b>	NO. OF SHEETS	DATE	REV.	DESCRIPTION OF REVISION	
<b>STORMWATER POLLUTION PREVENTION PLAN</b> <b>PRATT &amp; WHITNEY MIDDLETOWN FACILITY</b>					
SCALE AS SHOWN	CONTRACT NO. 68FH64	DATE 03/06/2025	DRAWN BY A.C.L.	DATE 03/06/2025	APPROVED BY J.W.S.
<small>©Loureiro Engineering Associates, Inc. All Rights Reserved 2024. As Revised 2026</small>					

**APPENDIX A**

**National Pollutant Discharge Elimination System General Permit for the Discharge of  
Stormwater Associated with Industrial Activities**

**National Pollutant Discharge Elimination System General Permit for the Discharge of Stormwater Associated with Industrial Activities**

At the time of the certification of this Plan, the GP is available at [https://portal.ct.gov/-/media/deep/water\\_regulating\\_and\\_discharges/stormwater/industrial/2025-permit-documents/2025-industrial-stormwater-general-permit-part-1--2erc.pdf?rev=e07e4c0e8e9942cfb424954fe5bc89e5&hash=CFF6E87399495EA4981CB0C8949F43CD](https://portal.ct.gov/-/media/deep/water_regulating_and_discharges/stormwater/industrial/2025-permit-documents/2025-industrial-stormwater-general-permit-part-1--2erc.pdf?rev=e07e4c0e8e9942cfb424954fe5bc89e5&hash=CFF6E87399495EA4981CB0C8949F43CD)

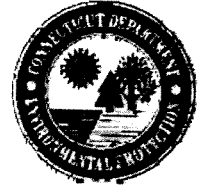
A copy of the GP is also included in a separate document to be kept with this Plan. This copy of the GP only includes the sector-specific requirements for Sector AB.

**APPENDIX B**

**General Permit Registration**



**STATE OF CONNECTICUT**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**



Bureau of Natural Resources/Wildlife Division  
79 Elm Street, Sixth Floor  
Hartford, CT 06106  
Natural Diversity Data Base

December 1, 2010

Ms. Kelly Starr  
Coastline Consulting and Development, LLC  
5-B Old Post Road  
Madison, CT 06443

re: Renewal of DEP NPDES Wastewater  
Discharge Permit for United Technologies, Pratt  
and Whitney Property located at 1 Aircraft Road  
in Middletown, Connecticut

Dear Ms. Starr:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed renewal of a DEP NPDES wastewater discharge permit for United Technologies, Pratt and Whitney property located at 1 Aircraft Road in Middletown, Connecticut. I have determined that these activities will not impact any known extant populations of Federal or State Endangered, Threatened or Special Concern Species that occur in the vicinity of this property.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Environmental Protection's Natural History Survey and cooperating units of DEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at 860-424-3592 or [dawn.mckay@ct.gov](mailto:dawn.mckay@ct.gov). Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Sincerely,

Dawn M. McKay  
Biologist/Environmental Analyst 3

Cc: NDDDB #201006417  
Oluwatoyin Fakilede, DEP-BMMC/AWPED



## Part II: Requester Information (continued)

Affiliation of primary contact, check one: <input type="checkbox"/> Property owner <input checked="" type="checkbox"/> Consultant <input type="checkbox"/> Engineer <input type="checkbox"/> Facility owner <input type="checkbox"/> Applicant <input type="checkbox"/> Biologist <input type="checkbox"/> Pesticide Applicator <input type="checkbox"/> Other representative (specify):
<b>3. Project Type:</b> Choose Project Type: Stormwater/waste/water discharge , If other describe: <u>Permit renewal</u>

## Part III: Site Information

This request can only be completed for one site. A separate request must be filed for each additional site.

<b>1. Site Location</b> Site Name or Project Name: <b>United Technologies, Pratt and Whitney Property</b> Town(s): <b>Middletown</b> Street Address or Location Description: <b>1 Aircraft Road</b>  Size in acres, or site dimensions: <b>The Pratt &amp; Whitney Property is comprised of numerous separate lots totaling 3,687 acres of land adjacent to the Connecticut River. The discharge location is located immediately south of the river pier, landward of the high tide line.</b> Latitude and longitude of the center of the site in decimal degrees (e.g., 41.23456 -71.68574):  Latitude: <b>41.32.14.4</b> Longitude: <b>-72.33.13.9</b>  Method of coordinate determination (check one): <input type="checkbox"/> GPS <input checked="" type="checkbox"/> Photo interpolation using <u>CTECO map viewer</u> <input checked="" type="checkbox"/> Other (specify):
<b>2a. Describe the current land use and land cover of the site.</b> <b>The land is currently being used to support various manufacturing operations. The land cover of the site includes parking lots, buildings and some landscaped areas. The area surrounding the discharge outfall is wooded. The eastern portion of the site is bordered by the Connecticut River.</b>
<b>b. Check all that apply and enter the size in acres or % of area in the space after each checked category.</b> <input checked="" type="checkbox"/> Industrial/Commercial <b>100%</b> <input type="checkbox"/> Residential - <input type="checkbox"/> Forest - <input type="checkbox"/> Wetland - <input type="checkbox"/> Field/grassland - <input type="checkbox"/> Agricultural - <input type="checkbox"/> Water - <input type="checkbox"/> Utility Right-of-way - <input type="checkbox"/> Transportation Right-of-way - <input type="checkbox"/> Other (specify): -

## Part IV: Project Information

1. Is the subject activity limited to the maintenance, repair, or improvement of an existing structure within the existing footprint?  Yes  No If yes, explain.

**The activity includes the renewal of an NPDES permit (#CT0001406) for an existing outfall. The outfall is a 60" pipe located adjacent to the shoreline south of the river pier.**

**Part IV: Project Information (continued)**

2. Give a detailed description of the activity which is the subject of this request and describe the methods and equipment that will be used.

**The activity is a renewal of an NPDES permit. The discharge point is an existing 60" pipe located south of the property's river pier. The pipe discharges stormwater collected from upland flow and non-contact cooling water from manufacturing operations. There are no activities proposed at this location other than outfall sampling as required by the permit.**

3. Provide a contact for questions about the project details if different from Part II primary contact.

Name: **David Provencher**

Phone: **203/245.8138**

Email: **david@coastlineconsulting-ct.com**

**Part V: Request Type and Associated Application Type**

Check *one* box from either Group 1 or Group 2, indicating the appropriate category for this request.

**Group 1.** If you check one of these boxes, fill out Parts I – VII of this form and submit the required attachments A and B.

- Preliminary screening was negative but an NDDB review is still requested
- Request regards a municipally regulated or unregulated activity (no state permit/certificate needed)
- Request regards a preliminary site assessment or project feasibility study
- Request relates to land acquisition or protection
- Request is associated with a *renewal* of an existing permit, with no modifications

**Group 2.** If you check one of these boxes, fill out Parts I – VII of this form and submit required attachments A, B, and C.

- Request is associated with a *new* state or federal permit application
- Request is associated with modification of an existing permit
- Request is associated with a permit enforcement action
- Request regards site management or planning, requiring detailed species recommendations
- Request regards a state funded project, state agency activity, or CEPA request

If you are filing this request as part of a state or federal permit application enter the application information below.

Permitting Agency and Application Name:

**Agency: Department of Environmental Protection – Bureau of Materials Management Compliance  
Assurance Water Permitting and Enforcement Division.**

**Application: NPDES Surface Water Permit for Wastewater Discharge**

State DEP Application Number, if known: **CT 0001406**

State DEP Enforcement Action Number, if known: **N/A**

State DEP Permit Analyst/Engineer, if known: **Oluwatoyin Fakiledo**

Is this request related to a previously submitted NDDB request?  Yes  No

Enter the previous NDDB Request Number(s), if known: **The most recent NDDB request (#16989) for the site was for maintenance to in-water river structures and new dredging for marine industrial use.**

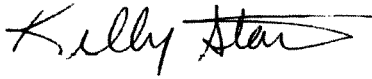
## Part VI: Supporting Documents

Please check each attachment submitted as verification that *all* applicable attachments have been supplied with this request form. Label each attachment as indicated in this part (e.g., Attachment A, etc.) and be sure to include the requester's name, site name and the date. **Please note that Attachments A and B are required for all requesters.** Attachment C (DEP-APP-007C) is supplied at the end of this form.

<input checked="" type="checkbox"/> Attachment A:	<b>Overview Map:</b> an 8 1/2" X 11" print/copy of the relevant portion of a USGS Topographic Quadrangle Map clearly indicating the exact location of the site.
<input checked="" type="checkbox"/> Attachment B:	<b>Detailed Site Map:</b> fine scaled map showing site boundary details on aerial imagery with relevant landmarks labeled. (Site boundaries in GIS [ESRI ArcView shapefile, in NAD83, State Plane, feet] format can be substituted for detailed maps, see instruction document)
<input checked="" type="checkbox"/> Attachment C:	<b>Supplemental Information, Group 2 requirement (attached, DEP-APP-007C)</b> <input checked="" type="checkbox"/> Section i: Supplemental Site Information and supporting documents <input checked="" type="checkbox"/> Section ii: Supplemental Project Information and supporting documents

## Part VII: Requester Certification

The requester *and* the individual(s) responsible for actually preparing the request must sign this part. A request will be considered incomplete unless all required signatures are provided.

<p>"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of the individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief."</p>	
	
Signature of Requester	11/19/2010
	Date
<b>Kelly Starr</b>	<b>Environmental Scientist</b>
Name of Requester (print or type)	Title (if applicable)
-	-
Signature of Preparer (if different than above)	Date
-	-
Name of Preparer (print or type)	Title (if applicable)

Note: Please submit the completed Request Form and all Supporting Documents to:

CENTRAL PERMIT PROCESSING UNIT  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 79 ELM STREET  
 HARTFORD, CT 06106-5127

Or email request to: [dep.nddbrequest@ct.gov](mailto:dep.nddbrequest@ct.gov)

**APPENDIX C**

**Stormwater Pollution Prevention Team**

**STORMWATER POLLUTION PREVENTION TEAM**  
**Stormwater Pollution Prevention Plan**  
**Pratt & Whitney**  
**Middletown, Connecticut**

<b>Pollution Prevention Team</b>	<b>Name and Title</b>	<b>Phone Number</b>
Team Leader	Jared Scata Principal Specialist EHS Generalist	860-781-4234 (cell)
Team Member	Jonathan Pooler Principal Specialist EHS Generalist	959-595-2559 (cell)
Team Member	Alicia Boremski PDC EH&S Manager	860-883-2229 (cell)
Team Member	Tamara Kilduff EH&S Professional	475-331-5777 (cell)
Team Member	Josh Messina CSMC EH&S Manager	860-266-8183 (cell)
Team Member	James Spatafora EH&S Professional	860-373-3310 (cell)
Team Member	Ian Herwig EH&S Professional	860-623-8733 (cell)
Team Member	Michael Santostefano EH&S Professional	860-983-7024 (cell)
Team Member	Darrin Stafford EH&S Professional	520-490-5768 (cell)
Team Member	Ashley Cruz EH&S Professional	959-529-4901 (cell)
Team Member	Paige Hanson EH&S Professional	434-218-9497 (cell)

Responsibilities: Developing this Plan, implementing the actions required by this Plan, assisting in the implementation, maintenance, and development of revisions to this Plan, maintaining control measures and making sure that all necessary corrective actions are completed. The PPT Leader's responsibility will be to ensure that this Plan is implemented, maintained, and revised as necessary. The PPT Leader will have the responsibility of ensuring that all provisions of this Plan are performed, such as periodic inspections, follow-up to inspections, any required monitoring, recordkeeping, reporting and training. The PPT Leader responsibilities also include ensuring that the PPT fulfills its responsibilities and the PPT Members complete SWPPP activities as necessary. The other PPT Members will perform duties as directed by the PPT Leader and as required to support this Plan's activities.

Site EHS professionals that are part of the spill response team are either present at the facility or on call during all operational shifts.

## **APPENDIX D**

### **Certification of Non-Stormwater Discharges Supporting Information**

## **Certification of Non-Stormwater Discharges Supporting Information**

### **Historical:**

A Drain Survey was performed by Loureiro (January 1990) to identify all discharges at the facility. In addition, Fuss & O'Neill and Pratt & Whitney conducted an evaluation of the stormwater system in September 1997, to identify non-stormwater discharges to the storm system during dry weather conditions. Flows were observed at several of the discharges and based on discussions with Pratt & Whitney personnel familiar with the systems, these flows, with the exception of one (SW007), were attributable to discharges permitted with CT DEEP under the NPDES program. Upon further inspection by Pratt & Whitney personnel, the flow for the SW007 discharge was attributable to the following sources: groundwater infiltration; air handler cooling water; and air handler air condensate. The majority of this flow was attributable to groundwater infiltration. Pratt & Whitney has permanently stopped the flow from the other two sources and as such, no unpermitted discharges exist at the facility.

### **More Recent:**

Facility inspections conducted by Loureiro during the major revisions of this Plan in April 2011 did not identify any non-allowable non-stormwater discharges to the stormwater system. An addition evaluation was conducted during dry weather on September 17<sup>th</sup>, 2024. The sampling points for all outfalls were observed, and no non-allowable non-stormwater discharges were detected.

**APPENDIX E**

**Spill Records**



**APPENDIX F**

**Emergency Response Plan Excerpts**

## **12.0 HAZARDOUS MATERIALS SPILL RESPONSE PLAN**

### **12.1 Hazardous Material Spill Response**

Emergency response to hazardous material (chemical, petroleum products, waste, etc.) spills shall be implemented in accordance with the site SPCC, FRP, Hazardous Waste Contingency Plan, and this section.

Pratt & Whitney's Hazardous Materials Emergency Response Management System is based on Incident Command. Emergencies are reported by calling extension 5111 (internal) or 860-344-5111 (external), which is manned by the Plant Security Fire & Life Safety Services in the Plant Security Fire & Life Safety Services headquarters. This serves as the command center for all incidents. The Plant Security Fire & Life Safety Services dispatcher gathers information from the caller and determines the initial response as outlined in Table 4-2. The IC onsite or on-call is notified by Plant Security Fire & Life Safety Services of any emergency evaluated at a Level 2 or above by the initial Security Fire & Life Safety Services officer responding, or by the Plant Security Fire & Life Safety Services dispatcher. The list of certified ICs is shown in Appendix A. Once the IC is notified of a hazardous material emergency, the Emergency Response Management System using Incident Command is initiated. Based on the emergency, the IC calls in whatever support he/she feels is needed. An operation's control center will be established at the site manager's office to provide a central location for media and community relations and plan for business interruption, should this be necessary.

#### **12.1.1 Incident Commanders**

Appendix A lists personnel who have been trained and certified as ICs for oil/chemical emergencies at the Facility. The IC on duty at the time of the incident assumes command until the primary IC is onsite. (Reference Table 4-1 and Section 4).

#### **12.1.2 Support Staff**

Other trained individuals may be delegated to various duties of the IC, as necessary, on behalf of those listed above. The EH&S coordinator and EH&S technician are called in for emergencies if not already onsite, and the site manager is notified of emergencies involving damage to the Facility, serious injury to an employee, or an incident having environmental impact requiring external notifications. Please refer to Appendix A for the key site emergency response contacts.

## **12.2 Preliminary Assessment**

### **12.2.1 Preliminary Information**

When a hazardous material spill emergency is reported to the dispatcher at 5111 (internal) or 860-344-5111 (external), the following information is given:

- The name of reporter
- The location of the hazardous materials emergency
- Date and time
- Chemical spilled
- Quantity released and is spill ongoing?
- Cause and source of discharge
- Did the spill reach navigable waters?
- Are there any injuries?
- Any spill mitigation/response activities implemented

### **12.2.2 Emergency Response Level Determination**

Based on the information reported from the initial responder(s), an emergency level is determined by the Plant Security Fire & Life Safety Services dispatcher (Section 4.2).

- Level 1: Hazardous Materials Emergencies are the least severe and can be mitigated solely by the responding Security Fire & Life Safety Services officer.
- Level 2: Hazardous Materials Emergencies can be mitigated solely by members of the Security Fire & Life Safety Services department and/or selected internal emergency response personnel.
- Level 3: Hazmat Emergencies are moderately severe. In addition to Security Fire & Life Safety Services and/or internal emergency response personnel, mitigation may require assistance by response personnel from outside professional emergency responders.
- Level 4: Hazmat Emergencies are most severe. In addition to Security Fire & Life Safety Services and internal emergency response personnel, mitigation requires assistance by response personnel from external professional emergency responders. The City of Middletown emergency response services may also be asked to respond.

## **12.3 Establishment of Objectives and Priorities**

### **Immediate Goals**

The Incident Command training establishes priorities for hazardous materials emergency responses as follows:

- Protection of life:
  - Assessment of hazards
  - Assessment of people involved; medical assistance required
  - Assessment of necessity to evacuate the area and the size area to be evacuated
  - Support assistance needed
  
- Containment
  
- Protection of the environment (air, land, water):
  - Pratt & Whitney site
  - Community

All hazardous materials emergency responders shall initially turn out in SCBA. Once a hazard assessment has been completed, the IC will establish the appropriate level of PPE and response protocol.

Hazardous materials response shall follow the basic response protocols as outlined in the PW Middletown Emergency Response Quick Reference Guide, found in the FRP (and associated ERAP) and the Hazardous Waste Contingency Plan Quick Reference Guide.

### **Hazardous Substances Spill Cleanup Procedures**

No Pratt & Whitney employees will perform hazardous material (including hazardous waste) spill cleanup activities. Contact either Tradebe Environmental Services or Clean Harbors, PW Middletown's emergency response contractors, for spill cleanup services.

### **3.5 Tornado Watch/Warning Procedures and Nor'easters**

In the event of a tornado watch, the following actions will be taken:

- The Plant Security Fire & Life Safety Services department, or designee, will monitor the weather broadcast and alert the area coordinators.
- Plant Security Fire & Life Safety Services will notify employees by utilizing the public address (PA) system.
- All employees will remain at their work stations until given further directions.

In the event of a tornado warning, the following actions will be taken:

- Plant Security Fire & Life Safety Services will direct all employees to assemble in safe areas.
- The area coordinators will conduct an accountability report for all employees.
- No employee will depart the area until Plant Security Fire & Life Safety Services determines it is safe to do so.

In the event of a nor'easter, potential for flood, hurricane, or other severe weather event, the following actions will be taken:

- Plant Security Fire & Life Safety Services will decide whether or not to relieve all non-essential personnel of their duties and order a site evacuation.
- Plant Security Fire & Life Safety Services, in consultation with site management, will decide if the facility will be running at normal capacity.

### **3.6 Terrorism and Workplace Violence**

In the event of an act of terrorism or workplace violence, the site's Plant Security Fire & Life Safety Services manager or department monitors will assess the situation, determine appropriate measures, and direct employees of the action to be taken. Employees should stay at their work stations until directions are given.

## **APPENDIX G**

### **Environmental Release Reporting Procedure**

**See Pratt & Whitney Middletown Site EH&S Procedure  
On The Intranet for the Current Version**

**APPENDIX H**

**Training Records**

**See Pratt & Whitney Middletown Site EH&S Electronic Stormwater Training Folder**

**APPENDIX I**

**Monthly Inspection Forms**

PRATT & WHITNEY  
Middletown, Connecticut  
**Monthly Inspection Form**

**Date, Time:** \_\_\_\_\_

**Weather Conditions\*:** \_\_\_\_\_

**Inspector's Name(s). Note which Inspector(s) are Pollution Prevention Team Members:**  
\_\_\_\_\_

**Inspector's Signature(s):**  
\_\_\_\_\_

\*At least one monthly inspection per calendar year must be performed while stormwater discharge is occurring.

**Check the following items that were inspected:**

<b>Stormwater discharge points</b>	<b>Satisfactory?</b>
SW001	
SW003	
SW005	
SW006	
SW007	
SW008	
<b>Outdoor Material Storage Areas</b>	<b>Satisfactory?</b>
B-110 North Side	
B-110 Northwest Corner	
B-150 East End	
B-150 Northeast Corner	
B-155	
Lot South of Road C	
B-230 East Side	
B-220 Northeast Corner (by B-250)	
B-220A North Storage Lot	
B-220A Northeast Corner	
B-220A Northwest Corner	
Lot East Side of Road L	
B-250 Lot North of Building	
B-280 East Side	
B-310 Northwest	
B-340 South Side	
B-362 Railroad Siding	
B-400 North End	
B-406 Road E Storage Lot	
B-410 East – Storage Lot Along Road E	
B-410 Northwest Lot	
B-410 North Side (Road T)	
B-410 West Side (Road T)	
B-425 North End	
B-440	
<b>Other Potential Pollutant Sources</b>	<b>Satisfactory?</b>
Roof vents 150	
Roof vents 220	
Salt Storage Area	

<b>Waste Storage Areas</b>	<b>Satisfactory?</b>
B-400 and B-403	
B-250	
Site (dumpsters)	
Outdoor Oil and Chemical Storage	
B-94 Generator	
B-97 Generator (seasonal)	
B-105 Fire Pump	
B-110 Generator	
B-130 Generators	
B-150 Generator	
B-230 North Generator	
B-310 ASTs	
B-331 ASTs	
B-345 Fire Pump	
B-413 Tank Farm	
B-435 Generator	
B-465 Generator, Transformers	
B-210 Transformers	
<b>Material Loading and Unloading Areas</b>	<b>Satisfactory?</b>
B-91	
B-110	
B-150	
B-170, Receiving Well	
B-220, Receiving Well	
B-220, Chip Well	
B-310	
B-331	
B-410, Test Cells 1-8, Service Rooms	
B-410, Outside Service Rooms	
B-435	
B-440	
<b>Other Potential Pollutant Sources</b>	<b>Satisfactory?</b>
Baghouses 150 South	
Baghouses 150 East	
Baghouses 220 North	
Baghouse 220 West	

PRATT & WHITNEY  
Middletown, Connecticut  
**Monthly Inspection Form**

**Did you observe any of the following (check Yes or No)**

**Yes    No**

Industrial materials, residue, or trash that may have or could come into contact with stormwater.	<input type="checkbox"/>	<input type="checkbox"/>
Leaks or spills from industrial equipment, drums, tanks, and other containers.	<input type="checkbox"/>	<input type="checkbox"/>
Offsite tracking of industrial or waste materials, or sediment, where vehicles enter or exit the site.	<input type="checkbox"/>	<input type="checkbox"/>
Tracking/blowing of materials from areas of no exposure to exposed areas.	<input type="checkbox"/>	<input type="checkbox"/>
Soil erosion; channel and streambank erosion and scour in the immediate vicinity of discharge points.	<input type="checkbox"/>	<input type="checkbox"/>
Non-authorized non-stormwater discharges (e.g. vehicle wash-waters, boiler blowdown, sanitary wastes).	<input type="checkbox"/>	<input type="checkbox"/>
Control measures needing replacement, maintenance, or repair.	<input type="checkbox"/>	<input type="checkbox"/>

If any issues were identified, provide comments below.

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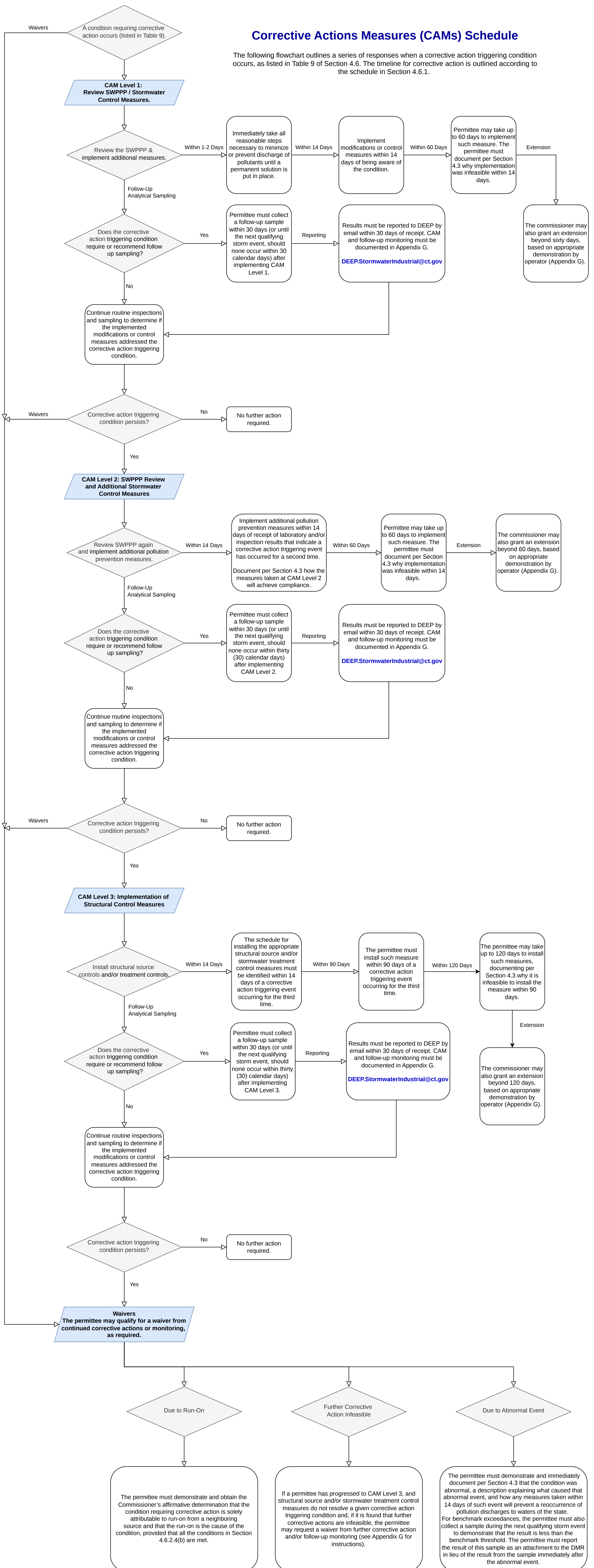


**APPENDIX J**

**Corrective Action Measure Documentation**

## Corrective Actions Measures (CAMs) Schedule

The following flowchart outlines a series of responses when a corrective action triggering condition occurs, as listed in Table 9 of Section 4.6. The timeline for corrective action is outlined according to the schedule in Section 4.6.1.



## **Appendix G**

### **Corrective Action Measure Requirements & Waiver Request**

**Purpose:**

A qualified professional, as defined in the general permit, trained and designated by the permittee, will complete this form as soon as they are made aware of a condition triggering a Corrective Action Measure (CAM). The permittee must keep this form and any related documentation in the Stormwater Pollution Prevention Plan.

**Violation of an Effluent Limitations Guideline:**

Violation of an Effluent Limit Guideline (ELG) requires immediate reporting in accordance with the permit terms and conditions. The permittee may attach this form when completing the online notification of noncompliance. See Sections 4.6 and 4.7 of the general permit for further reporting requirements. The Noncompliance Reporting portal is located at:

<https://portal.ct.gov/deep/water-regulating-and-discharges/industrial-wastewater/compliance-assistance/notification-requirements>

**Request for an Extension or Waiver:**

The permittee may also use this form to request an extension to timelines for implementing Corrective Action Measure Level 1, 2, or 3 as needed, or to request a Waiver from further Corrective Action Measures and/or monitoring. A request, and copy of the this form along with supporting documentation may be submitted to DEEP at Stormwater Staff [DEEP.Stormwaterindustrial@ct.gov](mailto:DEEP.Stormwaterindustrial@ct.gov). Retain a copy of all requests and communication in the SWPPP.

## Appendix G

### Corrective Action Measure Requirements & Waiver Request

<b>Section 1. Corrective Action Measure Documentation Submission Type</b>	
General Corrective Action Measure Documentation	<input type="checkbox"/>
Violation of an Effluent Limitations Guideline	<input type="checkbox"/>
Unauthorized spill, leak, release, or discharge	<input type="checkbox"/>
Request for an Extension to CAM Timelines	<input type="checkbox"/>
Request for a Waiver from Further Corrective Action Measures and/or Monitoring <sup>2</sup>	<input type="checkbox"/>

<b>Section 2. Corrective Action Measure General Information</b>		
<b>Permittee Information</b>	<b>Permittee Name</b>	
	<b>Site Name</b>	
	<b>Site Address</b>	
	<b>Site City/State/Zip</b>	
	<b>Permit Number (CTR05)</b>	
<b>Site Contact (Person Filling out this Form)</b>	<b>Name (first &amp; last)</b>	
	<b>Title</b>	
	<b>Email Address</b>	
	<b>Phone Number</b>	
<b>Date/ Time/ Location</b>	<b>Location of Incident on Site</b>	
	<b>Time of Condition Started</b>	
	<b>Date of Condition Started</b>	

## Appendix G

### Corrective Action Measure Requirements & Waiver Request

<b>Section 3. Corrective Action Triggering Condition Information</b>		
<b>Triggering Condition</b>	<b>Description</b>	<b>Condition Occurring? (Check Box)</b>
<b>4 Event Average Exceeds the Benchmark Threshold (or Mathematical Equivalent)</b>	A discharge exceeds an applicable benchmark threshold after 4 consecutive semi-annual measurements	<input type="checkbox"/>
<b>Effluent Limit Exceedance</b>	A discharge exceeds a numeric effluent limitation guideline	<input type="checkbox"/>
<b>Unauthorized release or discharge</b>	Spill, leak, release, or discharge of non-stormwater not authorized by this permit or another permit	<input type="checkbox"/>
<b>Inconsistency with an Applicable Total Maximum Daily Load and Wasteload Allocation</b>	A discharge is inconsistent with the assumptions and requirements of an Applicable Total Maximum Daily Load and its Wasteload Allocation	<input type="checkbox"/>
<b>Control Measure Not Stringent Enough to Meet Water Quality Standards</b>	A required control measure is not stringent enough for a stormwater discharge to be controlled as necessary such that the receiving water will meet applicable water quality standards	<input type="checkbox"/>
<b>Control Measure Never Designed, Installed, Implemented, or Maintained</b>	A required control measure was never designed, installed, or implemented	<input type="checkbox"/>
<b>Change in Design, Operation, or Maintenance at a Facility</b>	Construction or a change in the design, operation, or maintenance at a facility that significantly changes the nature or increases the quantity of pollutants discharged	<input type="checkbox"/>
<b>Visual Assessment Shows Evidence of Pollution</b>	Color, odor, floating solids, settled solids, suspended solids, or foam observed in discharge water	<input type="checkbox"/>
<b>Other Corrective Actions (as Required by the Commissioner)</b>	The Commissioner may utilize enforcement discretion to require additional corrective actions in response to permit violations	<input type="checkbox"/>

**Appendix G**  
**Corrective Action Measure Requirements & Waiver Request**

**Please provide a description of the event or the request being made to the Commissioner:**

**Appendix G**  
**Corrective Action Measure Requirements & Waiver Request**

<b>Section 4. Corrective Action Measure</b>		
<b>Select the appropriate level and describe the actions taken</b>		
<input type="checkbox"/> <b>Corrective Action Level 1</b>	Immediate Actions (Within 1-2 Days)	
	Subsequent Actions (Within 14-60 Days)	
	Extension (Greater than 60 Days)	
	Follow-up sample, if applicable (include date, discharge location, and parameter)	
<input type="checkbox"/> <b>Corrective Action Level 2</b>	Immediate Actions (Within 1-2 Days)	
	Subsequent Actions (Within 14-60 Days)	
	Extension (Greater than 60 Days)	
	Follow-up sample, if applicable (include date, discharge location, and parameter)	
<input type="checkbox"/> <b>Corrective Action Level 3</b>	Immediate Actions (Within 1-2 Days)	
	Subsequent Actions (Within 14-60 Days)	
	Extension (Greater than 60 Days)	
	Follow-up sample, if applicable (include date, discharge location, and parameter)	

## Appendix G

### Corrective Action Measure Requirements & Waiver Request

#### Section 5. Additional Information (check all that apply)

<input type="checkbox"/>  <b>Follow-up photographs</b>	Please describe any photographs taken and attach them to the end of this document.														
<input type="checkbox"/>  <b>Request for an extension</b>	Please describe the request for an extension for CAM implementation. Please see the permit for criteria applicable to exemptions.														
<input type="checkbox"/>  <b>Request for a waiver</b>	Please describe the request for a waiver from further corrective action measures and/ or monitoring. Please see the permit for criteria applicable to waivers.														
<b>Certification</b>	<p>I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate, and complete to the best of my knowledge and belief. I understand that a false statement made in the submitted information may be punishable as a criminal offense, in accordance with section 22a-6 of the Regs. Conn. State Agencies, pursuant to section 53a-157b of the Regs. Conn. State Agencies, and in accordance with any other applicable statute.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Certifier Name:</td> <td style="width: 30%;"><a href="#">Click or tap here to enter text.</a></td> <td style="width: 25%;">Certifier Title:</td> <td style="width: 20%;"><a href="#">Click or tap here to enter text.</a></td> </tr> <tr> <td>Certifier Signature:</td> <td></td> <td>Date:</td> <td><a href="#">Click or tap here to enter text.</a></td> </tr> <tr> <td>Site/Facility Name and Address:</td> <td><a href="#">Click or tap here to enter text.</a></td> <td>General Permit No.:</td> <td><a href="#">Click or tap here to enter text.</a></td> </tr> </table>			Certifier Name:	<a href="#">Click or tap here to enter text.</a>	Certifier Title:	<a href="#">Click or tap here to enter text.</a>	Certifier Signature:		Date:	<a href="#">Click or tap here to enter text.</a>	Site/Facility Name and Address:	<a href="#">Click or tap here to enter text.</a>	General Permit No.:	<a href="#">Click or tap here to enter text.</a>
Certifier Name:	<a href="#">Click or tap here to enter text.</a>	Certifier Title:	<a href="#">Click or tap here to enter text.</a>												
Certifier Signature:		Date:	<a href="#">Click or tap here to enter text.</a>												
Site/Facility Name and Address:	<a href="#">Click or tap here to enter text.</a>	General Permit No.:	<a href="#">Click or tap here to enter text.</a>												



**APPENDIX K**

**Semiannual Comprehensive Compliance Evaluation Form**

PRATT & WHITNEY  
Middletown, Connecticut  
**Semi-Annual Comprehensive Compliance Evaluation Form**

**Instructions:** This Semiannual Comprehensive Compliance Evaluation Form must be completed by, or along with, a Pollution Prevention Team (PPT) Member. If remedial action(s) are required, the issue(s) must also be noted in the Remedial Action Log. This Form should be filed in the PPT Leader's office area.

While completing this Form, please review, at minimum, the following items:

- SWPPP including, but not limited to, items such as best management practices (BMPs), control measures, spill response equipment, etc.;
- Site Maps;
- Monthly Inspection Forms;
- Quarterly Visual Assessment Reports;
- Discharge Monitoring Reports (DMRs); and,
- Preventive Maintenance (PM) Records.

Name, Title, and Signature of Inspector: \_\_\_\_\_

Date, Time: \_\_\_\_\_

Weather Conditions: \_\_\_\_\_

Name, Title, and Signature of PPT Member: \_\_\_\_\_

Date of the Last Semiannual Comprehensive Compliance Evaluation: \_\_\_\_\_

<b>Documentation Review</b>		
<b>Evaluation Criteria</b>	<b>Responses, Observations, and/or Comments</b>	<b>Is Remedial Action Required? (Yes/No)</b>
Are the names and telephone numbers of the PPT Members listed in Appendix C of the SWPPP up-to-date and accurate?		
Have there been any changes to the outside of the facility since the last semiannual evaluation that could affect stormwater?  Review the tables in the SWPPP to verify that the potential pollutant sources listed are accurate compared to current conditions. <ul style="list-style-type: none"> <li>• Have any new potential pollutant sources been added or removed?</li> <li>• If sources have been added, do the new sources add non-stormwater discharges to stormwater (e.g. vehicle wash-waters, boiler blowdown, sanitary wastes)?</li> <li>• Does the Site Plan need to be updated as a result of the aforementioned update(s)?</li> </ul>		
Were there any spills or leaks since the last semiannual evaluation that impacted stormwater? <ul style="list-style-type: none"> <li>• If so, were the spills or leaks documented in Appendix E?</li> </ul>		

PRATT & WHITNEY  
Middletown, Connecticut  
**Semi-Annual Comprehensive Compliance Evaluation Form**

<b>Documentation Review</b>		
<b>Evaluation Criteria</b>	<b>Responses, Observations, and/or Comments</b>	<b>Is Remedial Action Required? (Yes/No)</b>
<p>Have the PM activities outlined in the SWPPP (i.e., catch basin cleaning, equipment maintenance, sweeping, etc.) been performed at the specified frequencies?</p> <ul style="list-style-type: none"> <li>• Were maintenance records retained in the location specified in the SWPPP?</li> </ul>		
<p>Review the Monthly Inspection Forms that were completed since the date of the last Semi-Annual Comprehensive Compliance Evaluation.</p> <ul style="list-style-type: none"> <li>• Are the completed Monthly Inspection Forms filed in the designated location?</li> <li>• Were any unsatisfactory conditions corrected and was documentation retained to demonstrate this?</li> </ul>		
<p>Were Quarterly Visual Assessment Forms completed during each quarter since the date of the last Semi-Annual Comprehensive Compliance Evaluation?</p> <ul style="list-style-type: none"> <li>• Are the completed Quarterly Visual Assessment Forms filed in the designated location?</li> <li>• Were any unsatisfactory conditions corrected and was documentation retained to demonstrate this?</li> </ul>		
<p>Were semiannual stormwater samples collected during the last monitoring period?</p> <ul style="list-style-type: none"> <li>• If so, were monitoring results submitted to the Connecticut Department of Energy and Environmental Protection (CT DEEP) within 90 days of sampling?</li> <li>• Were there any benchmark exceedances?</li> <li>• If so, were corrective actions taken and was documentation retained to demonstrate this?</li> </ul>		
<p>Are there any issues that were identified in the previous Semi-Annual Comprehensive Compliance Evaluation that have not been addressed?</p>		
<p>Review stormwater training records.</p> <ul style="list-style-type: none"> <li>• Has annual training been performed? <ul style="list-style-type: none"> <li>○ If yes, document the date(s).</li> </ul> </li> <li>• Have newly hired employees been provided with stormwater training within 90 days of beginning a position that involves activities that could potentially affect stormwater?</li> </ul>		

PRATT & WHITNEY  
Middletown, Connecticut  
**Semi-Annual Comprehensive Compliance Evaluation Form**

<b>Site Inspection</b>		
<b>Evaluation Criteria</b>	<b>Responses, Observations, and Comments</b>	<b>Is Remedial Action Required? (Yes/No)</b>
<i>Interior Facility Walk-Through:</i> Inspect interior material and chemical storage areas including raw, intermediate, final, and waste materials that have the potential to be released outside of the confines of the facility and come in contact with stormwater.		
<i>Roof Inspection:</i> Inspect the roof for signs of contamination, discoloration, etc. as well as sediment build-up in gutters, roof drains, downspouts, etc.		
Make a visual inspection of material handling areas, and material storage areas, and other potential sources of pollution identified in the SWPPP for evidence of, or the potential for, pollutants entering the stormwater drainage system.		
Determine whether structural stormwater management measures, erosion control measures, control measures and other structural pollution prevention measures identified in the SWPPP are implemented and maintained properly.		
Inspect the integrity and functionality of stormwater treatment systems (e.g., oil-water separators).		
Inspect all outfalls. Describe any discharges occurring at the time of the inspection.		

PRATT & WHITNEY  
Middletown, Connecticut  
**Semi-Annual Comprehensive Compliance Evaluation Form**

**Remedial Action Log**

**Instructions:**

After completion of the Semiannual Comprehensive Compliance Evaluation Form, if any unsatisfactory condition(s) were observed, they shall be documented on this Remedial Action Log along with the corresponding remedial actions. This Log should be filed in PPT Leader's office area.

Date of Evaluation	Category	Description of Unsatisfactory Condition(s)	Remedial Action(s)		
			Description	Completion Date	Completed By

## **APPENDIX L**

### **Summary of Monitoring During Previous Permit Term**

## Summary of Monitoring During Previous Permit Term

Under the previous permit term, Pratt & Whitney sampled nine outfalls: SW001, SW002, SW003, SW004, SW005, SW006, SW007, SW008, and SW009.

SW002 was removed from the sampling program in 2013 after the demolition of Building 450 and the removal of associated stormwater structures. SW009 and the associated drainage area was later removed as well: the F006 Landfill was removed from the monitoring section of the plan after communication with CT DEEP in 2012. The interpretative concurrence focused on the fact of no waste exposure. If at any point in the future, waste becomes exposed or a leachate seep occurs, the landfill would need to be included in the sampling for at least another year, and the exposure would need to be eliminated again by correcting erosion or eliminating a leachate seep. Then, the landfill could be excluded from sampling again once no exposure occurred for a year.

In 2026, the drainage area boundaries were reassessed as part of the SWPPP renewal for the new industrial stormwater permit. Drainage areas 004 and 007 were combined into one area, with a single outfall (SW007). Sampling point SW004 was removed. The boundaries of Drainage Area 003 were corrected, and as a result, SW003 was removed from the sampling program as no industrial activity takes place in that drainage area.

During the sampling in 2011-2013, Pratt & Whitney did not have any instances where the average of four samples resulted in a benchmark exceedance, and was able to discontinue monitoring after four sampling events. A tables showing the four sampling events is presented below. Highlighted cells represent values above the benchmark, blank spaces represent data that was unavailable. All units are in mg/L unless otherwise specified.

	SW001				SW003			
	11/10/11	8/10/12	2/27/13	8/22/13	11/29/11	8/10/12	2/27/13	9/12/13
Oil & Grease	<2	<1.7	<1.7	<1.6	<1.7	<1.8	<1.7	< 1.7
Rainfall pH (SU)	4.86	5.44			6.01	5.44		
Sample Ph (SU)	7.52	7.65		7.8	6.05	6.71		5.8
Chemical Oxygen Demand	<20	<20	<20	<20	<20	69	<20	<20
Total Suspended Solids	4	12.4	1.4	7.6	<1	91	4	8
Phosphorus, Total	0.05	0.21	0.09	0.068	<.010	0.198	0.022	0.083
Total Kjeldahl Nitrogen	<1	<1	1.1	1.3	<1	1.8	1.1	<1.0
Nitrate Nitrogen as N	0.6	0.71	0.79	0.57	<0.46	0.6	<0.46	<0.46
Copper	0.006	<0.005	<0.005	<0.005	<0.005	0.014	<0.005	<0.005
Zinc	0.018	<0.010	0.015	<0.010	<0.01	0.075	0.023	0.02
Lead	<0.005	<0.005	<0.0050	<0.0050	<0.005	0.0153	<0.0050	<0.0050
24 Hr. LC50 (%)	>100		< 50		>100			
48 Hr. LC50 (%)	>100				>100			
E. coli (MPN/100 ml)	380						< 50	
	SW004				SW005			
	11/10/11	8/10/12	2/27/13	8/22/13	11/10/11	8/10/12	2/27/13	8/22/13

Oil & Grease	<1.8		<1.7	<1.8	<1.6	<1.7	<1.6	<1.7
Rainfall pH (SU)	4.86				4.86	5.44		
Sample Ph (SU)	6.42			6.5	6.69	6.56		6.7
Chemical Oxygen Demand	59		<20	28	66	25	<20	65
Total Suspended Solids	30		3.8	2.2	48	6.5	5.4	22.3
Phosphorus, Total	0.095		0.019	0.054	0.171	0.236	0.041	0.314
Total Kjeldahl Nitrogen	1.5		1	1.6	1.1	<1	1.1	2.3
Nitrate Nitrogen as N	<0.46		<0.46	0.51	<0.46	0.63	1.1	1.49
Copper	0.029		<0.005	0.024	0.011	<0.005	<0.005	0.009
Zinc	0.304		0.029	0.054	0.047	0.03	0.031	0.045
Lead	0.0398		<0.0050	0.0252	<0.005	<0.005	<0.0050	<0.0050
24 Hr. LC50 (%)	>100				>100			
48 Hr. LC50 (%)	>100				>100			
E. coli (MPN/100 ml)	160		< 50		50		< 50	
	<b>SW006</b>				<b>SW007</b>			
	11/10/11	8/10/12	2/27/13	8/22/13	11/10/11	8/10/12	2/27/13	8/22/13
Oil & Grease	<1.6	<1.7	<1.7	<1.8	<1.6	<1.7	<1.6	<1.6
Rainfall pH (SU)	4.86	5.44			4.86	5.44		
Sample Ph (SU)	6.58	6.31		6.4	6.92	6.6		7
Chemical Oxygen Demand	<20	30	<20	42	<20	23	<20	<20
Total Suspended Solids	17	10.8	2	6.6	1.2	19.2	3	2.6
Phosphorus, Total	0.073	0.164	0.031	0.17	0.016	0.087	0.014	0.035
Total Kjeldahl Nitrogen	<1	1	<1.0	1.8	<1	<1	1.1	<1.0
Nitrate Nitrogen as N	<0.46	0.48	<0.46	<0.46	0.48	0.83	<0.46	<0.46
Copper	<0.005	<0.005	<0.005	0.008	<0.005	0.006	<0.005	<0.005
Zinc	0.014	0.016	0.01	0.015	<0.01	0.026	0.02	0.013
Lead	<0.005	<0.005	<0.0050	<0.0050	<0.005	0.0099	<0.0050	<0.0050
24 Hr. LC50 (%)	>100				>100			
48 Hr. LC50 (%)	>100				>100			
E. coli (MPN/100 ml)	<50		<50		260		<50	
	<b>SW008</b>				<b>SW009</b>			
	11/10/11	8/10/12	2/27/13	8/22/13	11/10/11	8/10/12	2/27/13	
Oil & Grease	<1.7	<1.7	<1.6	<1.7	<1.6	<1.6	<1.7	
Rainfall pH (SU)	4.86	5.44			4.86	5.44		
Sample Ph (SU)	6.45	6.26		6.6	5.87	6.44		
Chemical Oxygen Demand	23	30	<20	37	71	<20	<20	
Total Suspended Solids	6	8.8	12.8	5	51	2	<1.0	
Phosphorus, Total	0.022	0.057	0.025	0.057	0.263	0.178	0.026	
Total Kjeldahl Nitrogen	<1	<1	<1.0	2.1	1	<1	<1.0	
Nitrate Nitrogen as N	<0.46	0.59	<0.46	0.49	<0.46	<0.46	<0.46	
Copper	<0.005	0.006	<0.005	0.018	0.009	<0.005	<0.005	

Zinc	0.051	0.079	0.02	0.075	0.136	0.069	0.03	
Lead	<0.005	0.008	<0.0050	0.0067	0.0052	<0.005	<0.0050	
24 Hr. LC50 (%)	>100				>100			
48 Hr. LC50 (%)	>100				>100			
E. coli (MPN/100 ml)	50		< 50		43,000		< 50	

## **APPENDIX M**

### **Deviations from Monitoring Schedule**



**APPENDIX N**

**Stormwater Discharge Visual Assessment Plan**

**STORMWATER DISCHARGE VISUAL MONITORING PLAN**  
**Stormwater Pollution Prevention Plan**  
**Pratt & Whitney**  
**Middletown, Connecticut**

**Overview:**

Once each quarter, stormwater shall be collected from each stormwater outfall and a visual assessment of each of these samples shall be conducted. Stormwater monitoring locations are shown on Drawing 1. If visual assessments are not satisfactory, the potential pollutants and the control measures used in the drainage area shall be re-assessed.

**Sample Collection Requirements:**

In accordance with the General Permit for the Discharge of Stormwater Associated with Industrial Activities: “The permittee must make the assessment on discharges from a qualifying storm event that occurs at least 72 hours (three days) from the previous discharge” and “If the facility is in an area that typically receives snow and the facility receives snow at least once over a period of four quarters, at least one quarterly visual assessment must capture snowmelt discharge, if feasible.”

**Frequency:**

Visual monitoring will be performed during a storm event on a quarterly basis. Visual monitoring can be performed independent of the semiannual sampling events or concurrent with the semiannual analytical monitoring events.

**Personnel:**

The quarterly visual assessment will be performed by PPT Members or an outside contractor.

**Monitoring Criteria:**

During each visual assessment event, the following items will be observed and recorded in the Visual Assessment Form:

- Color
- Odor
- Clarity
- Floating Solids
- Settled Solids
- Suspended Solids
- Foam
- Oil Sheen
- Other Obvious Indicators of Stormwater Pollution

**Procedure:**

- Verify exact sample location (i.e. correct manhole/discharge pipe). See Drawing 1 and Section 7.1 for stormwater monitoring locations.
- The sample collected shall be representative of the water discharged.

- Collect stormwater into a clean, clear glass or plastic container.
- Ensure sample volume is large enough to allow for assessment of monitoring criteria (see “Monitoring Criteria” above).
- Record visual observations on the attached Stormwater Discharge Visual Observation Log.
- The samples must be evaluated in a well-lit area, not necessarily at the sample location. There is no time limit between collecting and assessing the samples; however the observations noted should be representative of the water discharged.
- **Odor** — Odor should be evaluated by gently “fanning” the area over the open container to move air toward your face from about one foot away. If the discharge has a noticeable odor, for instance if it smells like gasoline fumes, rotten eggs, raw sewage, or solvents, or has a sour smell, this could be indicative of pollutants in the discharge. Note any discernable odors on the visual observation log.

**NOTES:**

1. Visual samples can only be collected during storm events that occur at least 72 hours after any previous storm events generating flow at the sampling location.
2. Samples must be collected within first 30 minutes of flow at the sampling location.
3. Visual assessments must be made in a clean, clear glass, or plastic container, and examined in a well-lit area.
4. If objectionable characteristics are observed, the cause of contamination must be investigated and corrected. Document the investigation and remedial actions on a Remedial Action Log.
5. File completed Quarterly Visual Assessment Forms in the PPT Leader’s office area.

**PRATT & WHITNEY**  
**Middletown, Connecticut**  
**Sampling Period: Quarter , Sampling Year**

**Quarterly Visual Assessment Form**

**Instructions:**

- A visual sample can only be collected during a storm event that occurs at least 72 hours after any previous storm events generating a discharge at the sampling location.
- A sample must be collected within the first 30 minutes of discharge at the sampling location. If it was not, please indicate why: \_\_\_\_\_
- The visual assessment must be made in a clean, colorless plastic or glass container and conducted in a well-lit area.
- If unsatisfactory water quality characteristics are observed, the cause(s) of contamination must be investigated and corrected. This information should be documented on the Remedial Action Log.

Sampling Date: \_\_\_\_\_ Stormwater Source (Rain/Snowmelt): \_\_\_\_\_

Discharge Start Time (am/pm): \_\_\_\_\_ Sampling Time (am/pm): \_\_\_\_\_

Sampling Location: \_\_\_\_\_

Sampler's Name, Title, Signature: \_\_\_\_\_

Water Quality Characteristics	Observations	Satisfactory (No further action required)	Unsatisfactory (Remedial action needed)
Color			
Odor			
Clarity			
Floating Solids			
Settled Solids			
Suspended Solids			
Foam			
Oil Sheen			
Other Obvious Indicators of Stormwater Pollution			

**PRATT & WHITNEY  
Middletown, Connecticut**

**Sampling Period:** Quarter , Sampling Year

**Remedial Action Log**

**Instructions:**

If unsatisfactory water quality characteristics are observed, the probable sources of stormwater contamination must be noted below along with documentation of the completed remedial actions. This Log should be filed in Appendix N of the Stormwater Pollution Prevention Plan (SWPPP).

Sampling Date	Unsatisfactory Water Quality Characteristics Observed	Probable Sources of Stormwater Contamination	Completed Remedial Actions		
			Description	Completion Date	Completed By

**APPENDIX O**

**Stormwater Sampling and Analysis Plan**

**STORMWATER SAMPLING AND ANALYSIS PLAN**  
**Stormwater Pollution Prevention Plan**  
**Pratt & Whitney**  
**Middletown, Connecticut**

This is the protocol for when Pratt & Whitney collects semiannual samples. If an outside contractor is performing the sampling, they will follow a similar protocol.

**Stormwater General Permit Obligations (Regulatory Background):**

In accordance with the General Permit for the Discharge of Stormwater Associated with Industrial Activities, Pratt & Whitney is required to collect stormwater samples twice per year. Once within the time frame of January 1<sup>st</sup> to June 30<sup>th</sup> and once within the time frame of July 1<sup>st</sup> to December 31<sup>st</sup>. Note that after completion of four sampling events an analysis will be conducted to determine what additional sampling is required. Note that the aquatic toxicity sampling is an annual event that is conducted during the first year of the general permit.

The Permit specifically states “All samples shall be collected from discharges resulting from a storm event that occurs at least 72 hours (three days) after any previous storm event generating a stormwater discharge. Any sample containing snow or ice melt must be identified on the Stormwater Monitoring Report form.” and “Collection of grab samples shall begin during the first thirty (30) minutes of a storm event discharge (flow at sampling location) and shall be completed as soon as possible. If it is not possible to collect the sample within the first thirty (30) minutes of a qualifying storm event, the sample must be collected as soon as it is feasible to do so after the first thirty (30) minutes and documentation must be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes. Samples shall be taken at the outfall or nearest feasible location representative of the discharge. All discharge samples at a facility must be taken during the same storm event, if feasible”

As a qualifying rain event approaches, the PPT Team Leader will coordinate sampling efforts for the collection of stormwater samples from the discharge permit locations listed in the Plan. The following is an outline of the tasks involved with semiannual sampling.

**Sample Event Preparation:**

The PPT Team Leader will prepare the following items prior to the event

- Chain of Custody (COC) Forms
- Sample Record Forms
- Table that summarizes the discharge points
- Sampling equipment
- Sample containers and coolers

**Gate Keys, Security Notification, and Additional Tools for Stormwater Collection:**

For some of the discharge points, samplers will need to notify security or obtain gate keys prior to sampling.

## **Sample Collection:**

### **SAFETY NOTE:**

**If lightning is occurring, DO NOT SAMPLE.**

Sample coolers will be assembled with the following bottles **for each sample point:**

- 1-1,000 ml (or 1-Liter) Glass Jar Preserved with Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) for Total Oil & Grease, COD, Total Phosphorus, and TKN analyses.
- 1-1,000 ml (or 1-Liter) Plastic Bottle, Unpreserved, for Aquatic Toxicity, pH, NO<sub>3</sub>-N, and TSS analyses,
- 1-250 ml Plastic Bottle Preserved with Nitric Acid (HNO<sub>3</sub>) for Total Copper, Total Lead, and Total Zinc analyses
- 1-4 oz Plastic Bottle, Sterile with Ice for Fecal Coliform

The following equipment will help aid in sample collection:

- Nitrile gloves (PPE)
- Plastic beakers to help collect the sample and collect the uncontaminated rain water
- Flashlight
- Sharpie (for labeling the bottles)
- Pen for filling out the COC and Sampling Form
- Other plastic sampling equipment

The pH of the samples will need to be analyzed on site due to hold time requirements. There are two portable pH meters at the Building 94 which can be used for field measurements.

Pick-up the equipment needed for the sampling event at Building 94.

Put on Nitrile gloves (Be sure to wear gloves because some of the bottles contain acids.)

Use the provided sample pitcher, plastic beaker, or dip pole to collect the sample. Rinse the sample pitcher, plastic beaker, or dip pole out a few times with the discharge water. Collect the water in the sample pitcher, plastic beaker, or dip pole and pour off into the sample bottles. Try to minimize any debris in the sample. Be sure to fill the bottles and do not overfill the containers (sample bottles may contain acid). After filled, cap the sample bottles tightly. Record the date and time on the sample bottles, COCs, and Sample Record Form. Store the bottles back in the cooler.

Next take the portable pH meter out and measure the discharge pH/temperature. Record the data on the Sample Record Form.

### **Labeling the Bottles when collecting the samples:**

The bottles are pre-labeled with their Discharge/Outfall Serial Numbers. The sampler will need to write the date and time the sample was collected on the bottles. The sampler will also note that there are many bottles for each discharge point. The recorded time should be the same on each bottle for a single discharge point. There will be a different time when the sampler moves on to

the next discharge point. Each site should be completed in the same day if at all possible. Therefore, the recorded dates will be the same on all the bottles for that site.

### **Paperwork:**

The paperwork directions are divided into two sections below. The sampler will note that data needs to be recorded on the COC and Sample Record Form for each sample point. Please note that the COC has been printed on carbon paper.

### **Completing the Chain of Custody (COC):**

The chains of custody (COC) forms are preprinted and have all of the outfalls listed. Each COC includes the outfall number, the types of bottles, the number of bottles, and parameters to be analyzed. The sampler will need to record the time and date the sample is collected on the COC. (Note – This will be the same time and date that the sampler recorded on the sample bottles). On the bottom of the COC, there is a signature section. The sampler must print his/her name and then sign, and time/date. The sampler will need to complete the first section noting samples are relinquished as well as the person who is picking up the samples. The sampler will sign twice because the person who collects the samples needs to relinquish the samples to the person picking up the samples. The laboratory personnel who pick up the samples will sign the COC and leave the yellow copy of the COC.

### **Completing the Sample Record Form:**

The Sample Record Form has many sections that need to be completed by the sampler. You will need to record:

- The outfall number
- Date of the sample event
- Time sample collected
- pH of the sample
- Time storm began (can be obtained from the Davis Instruments Weather Stations. The weather stations are located at Building 96)
- Describe if there is visible floating scum or oil or other material in sample
- Print sampler name and signature.
- Any sample containing snow or ice melt must be identified on the Discharge Monitoring Report form

### **Laboratory Sample Management:**

When stormwater sample collection for the Site is complete and all paperwork described above is complete, drive the samples to the laboratory. It is very important that the bacteria samples are transported to the lab immediately after collection due to the six hour hold time.

**APPENDIX P**

**Annual Report Template**

**APPENDIX Q**

**Record of Review Form**

**RECORD OF REVIEW FORM**  
**Stormwater Pollution Prevention Plan**  
**Pratt & Whitney**  
**Middletown, Connecticut**

Revision Date	Plan Section Revised	Revision Description (Describe addition, deletion, other)	Pages Affected	Revised By (Name)	Rev. Sent to Dist.	Required Approvals Obtained			
						Internal	Agency	Certified P.E.*	Other (describe)
3/16/17	FULL DOC	Review of document to incorporate new sand storage, and B-450 demo.	FULL DOC	LEA (AWE/TJS)	To: Kevin O'Brien				
6/7/2017	FULL DOC	Review of document to incorporate two spills in Drawings, and update of Hazardous Waste Storage areas.	Page 2.12 & 4.3	LEA (AWE / TJS)	To: Kevin O'Brien				
3/25/2026	FULL DOC	Complete reissuance of the SWPPP in accordance with the GP issued on November 1, 2025.	FULL DOC	LEA (JVA)	To: Jared Scata				

\* If significant changes are made to the Site or to the SWPPP in accordance with Section 4.3 of the GP, the SWPPP must be re-certified in accordance with Section 4.3.2.9 of the GP.