



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



August 21, 1992

Mr. James P. Runstadler
Environmental Services
Textron Lycoming/SAEP
550 Main Street
Stratford, CT 06497

Dear Mr. Runstadler:

I has reviewed your letter of June 16, 1992 proposing re-use of contaminated soil and other debris for onsite construction at the Textron-Lycoming Stratford Army Engine Plant. In response to your request, the following written comments are provided in follow-up to several phone conversations we have had.

Please provide more details of the source of these contaminated materials and how they became contaminated. It is necessary to address all criteria for identifying and listing hazardous waste which are specified in 40CFR261, not only the Toxicity Characteristic. For example, did the contamination result from a release of hazardous waste, or from release of any commercial chemical products listed in 40CFR261 subpart D? Note that the source of the contaminated material must be fully evaluated during site-wide environmental assessments conducted under RCRA Corrective Action or equivalent DoD programs.

Please provide further details of sampling locations/methods, the analytical data upon which your statistical summary is based, and a tabular summary thereof. Please describe the basis for selection of the particular analytes reported. In addition, please describe how the various statistical values were calculated.

The onsite re-use of contaminated soils in construction is not normally permitted by the Waste Engineering and Enforcement Division. Information submitted to date does not permit the material to be designated as clean fill, which must be "virtually inert" and not pose "a pollution threat to ground or surface waters". As David McKeegan indicated on July 13 it would appear that disposal of the material at a permitted solid waste disposal area could be authorized, with appropriate evaluation.

Alternatively, Textron Lycoming must demonstrate that the material meets the clean fill definition or must seek a special waste disposal authorization for onsite use. In either of these latter cases, if Textron Lycoming wishes to pursue the issue, further information as detailed below is needed for review by the Bureau of Water Management.

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Textron Lycoming must submit to DEP an evaluation of the possible impact of such re-use on human health and the environment. You must also demonstrate that such use is consistent with the State's groundwater and surface water quality classifications and goals for the site. Such evaluations and demonstrations must focus not only on the maximum concentration of contaminants present in the soil but also on the cumulative impact of the large mass of slightly contaminated soil. If Textron Lycoming desires, it may include the provision of appropriate longterm site controls, with assurances for continued implementation, within its evaluation and demonstration.

Should you desire to use contaminated material in onsite construction its description and location must be documented by a notation on the property deed. Textron Lycoming must include in any revised proposal a commitment to accomplish such a deed entry and proposed language for review.

I hope these comments prove helpful in revising your proposal; if you have any further questions please contact me at (203) 566-1847, Elsie Patton at 566-8787, or the Bureau of Water Management at 566-3654.

Sincerely,



Kenneth R. Feathers
Supervising Sanitary Engineer
Waste Management Bureau
Waste Engineering & Enforcement Div.

KRF:gt

<AVC9207.ltr>

cc: D. McKeegan, Waste Management Bureau, DEP
E. Patton, Deputy Commissioner's Office, DEP
N. Davidson, Bureau of Water Management, DEP