TEXTRON Lycoming

Stratford Division Textron Lycoming/ Subsidiary of Textron Inc. 550 Main Street Stratford, CT 06497 203/385-2000

June 16, 1992

Mr. K. Feathers, Supervisor Sanitation Engineering Site Remediation Division Connecticut Department of Environmental Protection 165 Capital Avenue Hartford, Connecticut 06106

RE: A Plan to use soil at Textron Lycoming / Stratford Army Engine Plant

Dear Sirs:

In 1989 and 1990, Textron Lycoming excavated approximately 12,000 cubic yards of soil from construction sites at Buildings 34 and 65 at the facility. In response to a concern regarding the condition of the soil, the soil was statistically sampled and analyzed for the presence of hazardous materials. All TCLP analysis results for metals and volatile organic compounds indicate that the soil is below the EPA classification for hazardous waste. However, a Total Petroleum Hydrocarbon average level 464 ppm was found in the soil. Approval is being sought on the acceptability of using some, or all, of this soil on the facility to fill in a parking area.

Attached are the results of the statistical analysis of the laboratory test results for the sampled soil. The individual laboratory results are available if necessary for review. The sample locations and analysis requirements were randomly generated to achieve a 95% confidence level for the entire soil segment being tested as per EPA SW-846, Volume II, Chapter Nine methods publication. This soil was in nine (9) different piles, each pile being analyzed on the attached respective lab report. The soil in each pile had been spread out over a bermed surface to a depth of about two feet for sampling. Samples collected were analyzed for one or more of the following:

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TCLP Extraction: US EPA TCLP 742 US EPA TCLP 7190

Total Gross Metals: SW-846 7420 SW-846 7190

Total Petroleum Hydrocarbons: US EPA 418.1 SW-846 9071

Volatile Organic Compounds: US EPA 8010 US EPA 8020

All of the analyses were preformed by Clearwater Analytical Laboratory, Inc.

Textron Lycoming plans to use this soil to correct depressions in a parking lot on the southern portion of the facility. An overhead view of the proposed parking area changes is attached. The parking area currently has several large saddle depressions. During periods of heavy rain this parking area can become flooded and thus prevent its use for a period of several days. Our plan is to use the excavated soil to fill these depressions. This soil would be compacted and an asphalt topping used to provide a finished parking surface level with the surrounding parking area.

From another construction project on building 16, a small quantity of construction debris is being accumulated. A sample of the soil and concrete in the debris was taken and an analysis performed by Milford Materials Lab, Inc. to examine for suspected hazardous materials. The analysis results are attached. Based on this analysis, both the concrete and soil from this project were found to be non-hazardous. Textron is planning to break up the concrete and utilize the debris in conjunction with the soil in the construction of the parking area.

Based upon the attached analysis summary of the excavated materials, Textron Lycoming requests approval to use these materials in the planned work on the Textron operated facility. I will be calling shortly to arrange a meeting where this matter can be discussed further. Meanwhile, if you have any questions, please do not hesitate to call me at 385-3741. Thank you.

James P. Runstadler Environmental Services Textron Lycoming/SAEP

JR/fc
attachment
cc: D. McKeegan, DEP
G. Dews, DEP
R. Matteuzzi, AVSCOM
A. McDermott, AMC
J. Kuehnle, AVSCOM
Lt. Col. Kafkalis, DPRO