

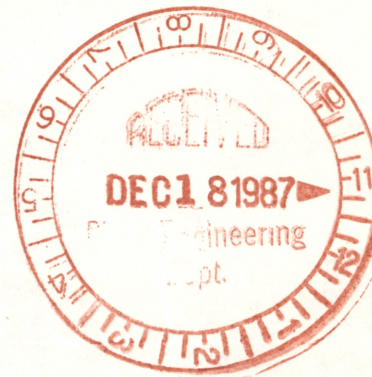


STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



December 14, 1987

Mr. John Fleming, Chief  
Environmental Compliance  
Avco Lycoming Textron  
550 Main Street  
Stratford, Connecticut 06497-2452



RE: Surface Impoundment Closure

Dear Mr. Fleming:

On August 12, 1987, public comment was solicited on the June 1987 Avco Lycoming Textron surface impoundment closure/post-closure plan. Connecticut Fund for the Environment and the Environmental Defense Fund provided public comment (enclosed) on September 8, 1987. We have reviewed the June 1987 plan; the revised plan dated September 1987, as amended on September 30, 1987; and the public comments. In order to approve the closure/post-closure plan the following information is necessary as discussed at our meeting December 3, 1987:

1. Provide evidence that all Appendix IX hazardous constituents that could possibly be present are incorporated into the verification testing plan for contaminated soil removal.
2. Verify that any residual contaminated soil remaining on-site will be protected by the cover system (cap). This particularly applies to the laterally contaminated soils within the berm areas. The limits of the cover system are defined as the point where the hazardous constituent concentration in the soil equals background or risk based standards.
3. Provide design criteria including sketches showing the interfacing of the cover system membrane with the drainage ditches and the cover system drainage layer leak-offs with the drainage ditches.
4. Provide justification for proposed confirmation sampling density as stated on pages 4-7 and 4-8. The probability for detecting hazardous waste contaminated soil must be at least as high as 90%.

As we discussed, the requested information will be submitted by January 4, 1988.

Phone:

165 Capitol Avenue • Hartford, Connecticut 06106

*An Equal Opportunity Employer*

200.1e  
SAEP\_01.01\_0609\_a

Mr. John Fleming  
Avco Lycoming Textron

page two

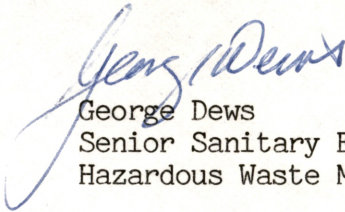
In the event Avco decides to remove all contaminated soil to the seasonally low water table, an alternate cover system that meets the closure performance standard may be feasible. The approval of an alternate cover system would be based on both the Department of Environmental Protection and Environmental Protection Agency's concurrence. If an alternate cover system is approved, post-closure monitoring and maintenance for 30 years is still necessary. In addition a proposal to modify the closure plan to incorporate this change would be significant and would require a public notice.

If there are any questions, please call

George Dews - Connecticut DEP - (203) 566-2264

Robert Ledger - U.S. EPA - Region I - (617) 573-9656

Sincerely



George Dews  
Senior Sanitary Engineer  
Hazardous Waste Management Section

GD:et

cc: Carmine DiFilippo - Metcalf & Eddy, Inc.  
Commander, USA VSCOM - Todd Riggs  
Kenneth Feathers - CT DEP  
Robert Ledger - U.S. EPA - Region I