

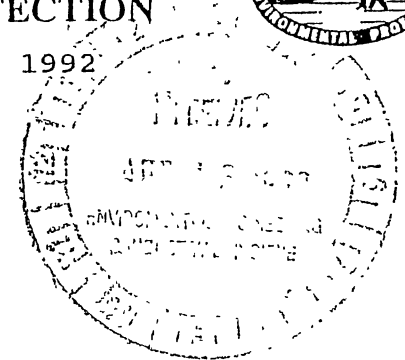


STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



April 08, 1992

Dr. John S. Fleming
Environmental Compliance
Textron Lycoming
550 Main Street
Stratford, CT 06497-2452



Dear Dr. Fleming:

I have reviewed your request for modification of Textron's current ground water monitoring (GWM) program, as presented in the 1991 annual report "8th Year Annual Summary Report, Groundwater Assessment Monitoring Program" (submitted January 1992). I believe that the following comments pertaining to the proposed program modification are consistent with CT DEP's position as expressed during our meeting on 20 March 1991 (attendees: J. Fleming (AVCO), J. Kuehnle (AVSCOM), T. Hughes (CA Rich), M. Fracasso (CT DEP), K. Feathers (CT DEP)).

Current Regulatory Framework

The CT DEP/US EPA-approved "Surface Impoundment Closure Plan" (September 1987) discusses a GWM program comprising original site wells 1-13, with specified monitored parameters and sampling frequencies (sections 5 and 7 of closure plan). In accordance with 40CFR265.118, any proposed modifications to the approved closure/post-closure GWM program must be formally submitted in writing as a stand-alone document and would be subject to Public Notice before approval.

Additional site wells and associated monitored parameters and sampling frequencies were installed as part of Textron's dynamic assessment monitoring program, in partial response to CT HM-358 (Administrative Order). These assessment monitoring wells, parameters, and sampling frequencies are not explicitly part of the approved closure/post-closure GWM program. Consequently, modifications pertaining to the dynamic assessment monitoring program (ie., wells and associated monitored parameters and sampling frequencies not specified in the approved closure/post-closure plan) may be instituted unilaterally ("at-risk") by Textron and would not be subject to Public Notice.

Textron may wish to consider a comprehensive request for GWM program modification, including aspects currently governed independently by HM-358 and the approved closure/post-closure plan. Such a request would provide an opportunity to update the approved closure/post-closure GWM plan to incorporate the increased site hydrostratigraphic knowledge recently acquired during the assessment program. A comprehensive request for GWM program modification might logically be framed from the perspective of future integration of the program into an anticipated site-wide RI/FS. I remind you that Public Notice comments would be limited

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to proposed modifications of the GWM program, and would not re-open the entire closure/post-closure plan to review.

Any considered modifications to the current facility GWM program should be consistent with the requirements of HM-358 and the requirements for assessment monitoring as stated in 40CFR265.93. Agency evaluation of proposed GWM program reductions, with respect to conformance with HM-358 and 40CFR265.93, will require submittal by Textron of detailed technical justification. This technical justification should comprise, at a minimum, several lines of evidence as discussed below.

GWM Program Modification: Required Supportive Evidence

Objectives of closure/post-closure GWM at sites closed as landfills include, but are not limited to, (1) ensuring timely detection of releases should cap failure occur, (2) continued assessment of ground water contaminant plume, if present, and (3) ensuring compliance with applicable closure/post-closure performance standards. Proposed modification of an existing GWM program must be formulated such that the resultant GWM program is capable of achieving the objectives of closure/post-closure GWM. Evidence required by CT DEP to justify GWM program modification includes, but is not limited to, the following:

1. A history of analytical non-detects (ND's) for specified parameters may support petitions for parameter elimination or reduced monitoring frequency. However, ND's alone are insufficient to justify program modification without reference to original waste composition and discussion of fate and transport of the parameters in question. A history of ND's for specified parameters may simply indicate that the cap is working; potential future cap failure might result in release of those parameters into the site ground water, where they should be detected by GWM.

2. Proposals for elimination or reduction in monitored frequency of specified parameters must be referenced to those parameters' relative contribution to the original waste or waste treatment process. If a given parameter was either a minor waste constituent, or not a component of the original waste, could it conceivably be a natural degradation product of a waste component, and therefore a potential future indicator of release of the parent waste?

3. Proposals for elimination or reduction in monitored frequency of specified parameters must be referenced to site specific and/or generic fate and transport characteristics of those parameters. If generic characteristics are used, complete citation of relevant published studies must be included. Discussion should include, but not be limited to, site ground water flow rates and site ground

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water geochemistry pertaining to the specified parameters.

For example, a given volatile organic compound may not have been detected for 4-5 years of monitoring. Studies of similar sites elsewhere (citation must be provided) have shown that the parameter undergoes complete natural degradation in 1-2 years following introduction into the environment. This parameter is a good candidate for elimination from monitoring. Conversely, continued monitoring would be warranted for a given inorganic parameter that is geochemically stable and relatively immobile, even though it may not have been detected during the same 4-5 years of monitoring.

4. Proposals for elimination or reduction in monitored frequency of specified wells must justify, using site specific ground water flow directions and rates, why those wells are not necessary to (a) detect potential releases, (b) to refine delineation of existing plume configuration, and (c) to track dynamic plume migration.

The facility must bear the burden of proof in demonstrating that any proposed GWM program modification is protective of the environment. Proposed GWM modifications must be accompanied by several lines of supportive evidence, and the resultant GWM program must be shown to be capable of (1) detecting potential releases in a timely manner, and/or (2) tracking changes in pre-existing plume configuration in timely manner. Please free to write or call me at (203) 566-1847 if you have any questions during preparation of your request for GWM program modification.

I am presently reviewing Textron's submittal entitled "Supplementary Hydrogeologic Investigation Report, Textron/Lycoming, Stratford, CT" (December 1991) in the context of compliance with HM-358. I anticipate completing the review shortly, and will transmit to you any technical comments at that time.

Sincerely,



Michael A. Fracasso
Environmental Analyst
Site Remediation & Closure Div.
Waste Management Bureau

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cc: K. Feathers (CT DEP)
T. Hughes (CA Rich)