



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



October 23, 1992



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

Dear Dr. Fleming:

I have reviewed Textron's proposal for modification of its ground water monitoring plan (GWMP), titled "Ground Water Assessment Modification Plan, Textron/Lycoming, Stratford, CT" (prepared by CA Rich, dated September 1992; rec'd 09-25).

As I understand it, the proposal differs most from the current operative GWMP by defining two sets of wells: (1) RCRA compliance monitoring wells, which are subject to sampling frequencies and other standards as promulgated in Regulations of Connecticut State Agencies (RCSA) 22a-449(c)-105(c) [incorporating 40 CFR 265], and (2) monitoring network observation wells, which provide ancillary hydrogeologic data for evaluation of the adequacy of the compliance well network, but whose proposed sampling frequency (annual) is not subject to the requirements of RCSA 22a-449(c)-105(c). Compliance monitoring wells and network observation wells are both formal components of Textron's proposed GWMP. Wells MW-6, MW-9I, MW-9D and MW-11 have been specified by Textron as observation wells, because their locations or screened intervals, or both, have been evaluated as being of limited utility in contaminant plume assessment. Moreover, Textron has made provision in its proposal to re-instate selected observation wells as compliance monitoring wells, as may be warranted by future detection of contamination in said wells.

Textron's proposed GWMP also recommends elimination of mercury, hexavalent chromium, and amenable cyanide as monitored parameters; total chromium and total cyanide (which include the hexavalent and amenable fractions, respectively) will remain as monitored parameters. Textron has presented waste stream data and historic monitoring data which support its contention that continued monitoring for mercury, hexavalent chromium, and amenable cyanide is unnecessary in the context of contaminant plume assessment. Moreover, Textron has made provision in its proposal to resume monitoring for hexavalent chromium or amenable cyanide, or both, if future analyses for total chromium or total cyanide show concentrations significantly elevated over present values.

Textron's proposal to include the parameters chloride and redox potential (Eh) on its monitored parameter list appears to be appropriate with respect to the site hydrochemical setting.

Textron's proposal to reduce frequency of monitoring from semi-annually to annually for the parameters TOC and TOX is

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justified, because the facility is conducting a dynamic assessment ground water monitoring program in which site-specific volatile organic and halogenated organic plume components have been identified and are being monitored semi-annually.

Textron's QA/QC protocols appear to be appropriate for the site.

With the provision that the ground water elevation in each observation well be recorded during each quarterly sampling event (and included on ground water elevation contour maps, as appropriate), Textron's proposed modified ground water monitoring assessment plan appears to meet regulatory requirements, and Textron may implement the modified plan at its discretion.

I am presently reviewing CT DEP files to ascertain Textron's status with respect to compliance with the requirements of Order HM-358; I will apprise you shortly if I discover any outstanding issues which require resolution.

Sincerely,



Michael A. Fracasso
Environmental Analyst
Waste Engineering & Enforcement Div.
Waste Management Bureau

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cc: T. Hughes (CA Rich)
P. Ploch (CT DEP)