

TEXTRON Lycoming

Stratford Division
Textron Lycoming/
Subsidiary of Textron Inc.

550 Main Street
Stratford, CT 06497
203/385-2000

October 26, 1992

Mr. David A. Nash
Director, Waste Engineering and Enforcement Division
Waste Management Bureau
Connecticut Department of Environmental Protection
165 Capital Avenue
Hartford, CT 06106

RE: RCRA Closure Certification
Surface Impoundments
EPA I.D. No. CTD001181502

Dear Mr. Nash:

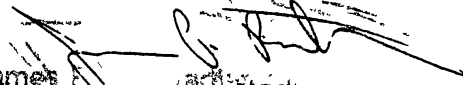
In response to your letter of September, 25 1992 requesting additional information Textron is pleased to provide the following documentation.

An itemized response to the specific comments included in your letter is enclosed. A reference to the appropriate section of the Closure Certification document submitted August 11, 1992 has been included where applicable.

Please contact me if you have any questions regarding this material. Thank you.

Sincerely,

TEXTRON LYCOMING


James P. Runstadler
Manager, Environmental Services
(203) 385-3741

PAK-EG
Enclosure
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**CLOSURE CERTIFICATION
SUMMARY OF REVISIONS
AVCO CORPORATION - TEXTRON LYCOMING
OCTOBER 26, 1992**

DEP Comment No. 1:

Review of the soil verification test results in Section D of the certification document and the sample location drawing in Section E of the certification document shows that over 20 soil samples around the perimeters of both closure areas were contaminated. Condition 1 of the closure plan approval letter states that "any contaminated soil left in place will be closed as a landfill per Section 265.310 of 40 CFR", however this soil was neither removed nor covered by the synthetic membrane cap. This departure from the approved closure plan must be explained and a demonstration that it is equivalent to that which is specified in the approved closure plan must be provided in the closure certification document.

Textron Response No. 1:

The extent of the excavation shown in the drawings in Section E of the Closure Documents submitted August 11, 1992 was only approximate. The limits were based upon the fact that in order to correctly place the synthetic membrane cap, the excavation of the area must extend beyond the final limits of the synthetic membrane as outlined in the Closure Plan drawings included in Section F of the Closure Certification Documentation submitted August 11, 1992. Since it is four years after the closure of the area was performed, the true limits of the excavation can not be determined based on the presently available information. As is stated in the attached statement from VFL Technology Corporation, the samples taken were "clean" for metals and "to our knowledge no contaminated soil was left in place in the cited areas".

DEP Comment No. 2:

The approved closure plan, pages 4-9 and 4-10 states that "several hundred feet" of pipeline and a pumphouse are to be removed during closure. (This is a new issue, not discussed in the letter from CT DEP dated May 12, 1992). The certification report must therefore provide the following:

- a. Previous location of the pipe and pumphouse on a site map.
- b. Description of the pipe rinsing process.
- c. Post excavation soil verification data for the underlying soils for the pipe and pumphouse. If the data indicate any exceedances in closure standards, include a demonstration that what was done is equivalent to that which is specified in the approved closure plan.
- d. Description of the removal process and final disposition of the waste material.

Textron Response No. 2a:

The previous location of the pipe and pumphouse are shown on sheet no. 2 of the Closure Plan drawings drafted by Metcalf & Eddy. The Closure Plan Drawings are included in Section F of the Closure Certification Document submitted August 11, 1992.

Textron Response No. 2b:

As described in the attached statement from VFL Technology Corporation, the majority of the in ground pipe was vitrified clay. This pipe was crushed and sent to the Stablex Landfill with the other contaminated soil. A portion of the pipe on the site was cast iron. This pipe was cut into approximately 10 foot sections, pressure washed, allowed to dry, examined for cleanliness, and then disposed of as scrap metal.

Textron Response No. 2c:

It is believed that the sample locations in the southwest corner of the surface impoundment (#24 & #25) are representative of the conditions under the pumphouse and adjacent piping. One of these samples indicates a low level of tetrachloroethylene. This material is found in spots surrounding the closure area and is occasionally found in the groundwater monitoring. The tetrachloroethylene was not a constituent of the metal hydroxide sludge placed in the impoundment areas and thus this low level was considered not to be a contaminant. The sample results that VFL Technology Corporation stated they had sent to Textron Lycoming are not available.

Textron Response No. 2d:

As described in the response to question 2b and as outlined in the Closure Plan, the vitrified clay pipe was crushed and sent to the Stablex Landfill for disposal. The cast iron pipe was cut into approximately 10 foot sections, pressure washed, allowed to dry, examined for cleanliness, and then disposed of as scrap metal.