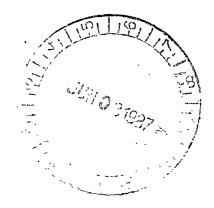


STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



June 5, 1987

Marion L. Caldwell, Jr. Colonel, Corps of Engineers District Engineer, Commanding New York District, Corps of Engineers 26 Federal Plaza New York, New York 10278-0090



Dear Colonel Caldwell:

Your letters of April 17 and May 13, 1987 requested extensions of 90 and 60 days respectively for the April 24 date set by Department of Environmental Protection Staff for submittal of a revised closure plan for the surface impoundments located at the Stratford Army Engine Plant, Stratford. The originally requested 90 day extension was not acceptable. Since my staff were informed by Avco Lycoming Textron personnel that efforts were underway to revise the proposed schedule no immediate response was made in the interest of maintaining a good working relationship. The proposed June 23, 1987 submittal date for a revised closure plan, resulting in a 60 day extension, is acceptable. Should you fail to submit a revised surface impoundment closure plan by June 23, 1987 a formal enforcement action may be taken by this Department.

In your April 17 letter you essentially request a 180 day delay for implementation of the closure period following approval. Connecticut and Federal regulations require closure of surface impoundments be completed within 180 days of either plan approval or last receipt of waste, whichever is later. The regulations provide for approval of an extended closure period for closure activities which, of necessity, take longer. The owner/operator must demonstrate that operations will require additional time and that steps have been taken to prevent threats to human health and the environment in the interim. Your request for an extended closure period based on Corps of Engineers' review and bid requirements is acceptable; however the requested time interval is not.

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A minimum of 60 days will elapse between revised plan submittal and approval, since CTDEP and EPA staff must review the revised plan, and the public will be provided another opportunity to comment during a 30 day public notice period. In addition, a draft plan is expected to be available for review approximately thirty days prior to submittal. If the Corps of Engineers' technical review is conducted concurrently with these reviews the requested 180 day implementation delay could be reduced to 60 days, which would be acceptable.

I look forward to your response to this letter and trust that closure of the hazardous waste units at this facility can be expedited. Should you have any questions please contact Michael Powers at 566-1847.

John W. Anderson Acting Commissioner

cc: John Fleming, Avco Lycoming Textron