

TEXTRON Lycoming

Stratford Division
Textron Lycoming /
Subsidiary of Textron Inc.

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

15 January 1991

Ms. Joan Jouzaitis
United States Environmental Protection Agency
Region Waste Management Division
JFK Federal Building (HRW-CAN3)
Boston, MA 02203

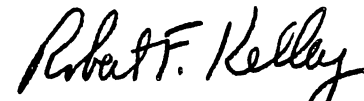
Mr. Paul Hassler
Hazardous Materials Management Section
CT Department of Environmental Protection
14 Trinity Street
Hartford, CT 06106

Re: Response to the June 1990 EPA/CT State RCRA Facility Inspection of Textron
Lycoming's Stratford, CT site

We have prepared this detailed response to demonstrate our commitment to take all necessary steps to ensure compliance with the RCRA regulations. We do not necessarily agree that each of the inspectors' comments was factually accurate or that each of the alleged deficiencies represents an actual regulatory violation. Accordingly, nothing in the attached response should be deemed an admission of fact or law, because we have implemented or intend to implement a particular change or otherwise. Please be assured, however, that this voluntary written response to the inspection reflects our best efforts to work with you both to meet your concerns about past operations and to minimize potential violations in the future.

Sincerely,

TEXTRON LYCOMING



Robert F. Kelley, Manager
Environmental Services

A. SUMMARY

Textron Lycoming Division's Stratford facility offers the following status report of actions taken or planned as a result of the June 1990 EPA and CT DEP RCRA inspection of the site. To further demonstrate willingness to comply, we propose a meeting of all the involved parties at your earliest convenience to further explain the content of our actions and assure that these actions are consistent with full compliance with the RCRA regulations. In addition, we will be prepared to discuss activities taken or planned which, while although not specifically required by RCRA, are steps we have taken or will take to assure that: (1) more control is exercised over events in the future; (2) potential violations are foreseen and addressed promptly; (3) reasonable precautions are taken to prevent violations from occurring; and (4) employees' knowledge is increased, both of the hazards and the legal requirements in these areas.

B. REVIEW OF THE HAZARDOUS WASTE INSPECTION REPORT & ACTIONS TAKEN

I Waste Profile

Inspector's Observations: (Taken from 1989 TSDF Annual Report)

- 1) F008 MEOH sludge (stream improperly coded; should be F006); 96 tons/1989.

Action Taken: The September 1990 application for export of the metal hydroxide sludge represents the revision in classification from F008 to F006. Until such application is approved, Textron Lycoming will continue to manifest the waste as F008 because the waste arguably falls into either category.

- 2) A review of 1990 manifested shipments to date revealed the following:

No land ban certification form on file for F001 sent to United Industrial Waste.

Action Taken: United Industrial Waste was contacted and a copy of the land ban certification was received and filed with this shipment.

- 3) Shipments of waste oil were sent to various TSDF's as Connecticut Regulated (CR) waste with levels of chlorine in excess of 1000 ppm chlorine.

Action Taken: New procedures have been written (7/5/90) and implemented for sampling and analyzing fluids being collected for waste oil and waste fuel to assure that future shipments of oils in excess of 1000 ppm chlorine are classified correctly.

- 4) Two shipments of waste oil were shipped with waste classification as Code D001 or "none" and were later recoded by the receiving TSDF as either F001 or F002.

Action Taken: Textron's files have been modified to account for the change in classification.

- 5) On-site Disposal/Spills

Areas of Building 65 and 34 jet fuel tanks have soil contamination.

Action Taken: All contaminated soil was removed from the Building 65 and 34 site as part of the excavation for new construction. This soil is under remediation plan with the concurrence of CT DEP.

- 6) Open drain valve to crushed stone at the waste container storage area.

Action Taken: The valve has been closed. There should be no future accumulations of water in the contained area since area has been enclosed (the hazardous waste pad) on three sides.

III NOTIFICATIONS

Inspector's Observations

Closure plans do not match, lack waste codes and lack additional waste streams. On-site Part A is incomplete.

Action Taken:

- 1) Additional waste codes, additional waste streams are being reviewed and will be included in our current listing of generated waste.
- 2) Secure complete Part A by requesting copy from State/EPA.
- 3) Closure plans will be reviewed for accuracy and timeliness of actions.

NOTE: Proposed closure plans were submitted to CT DEP and are awaiting final CT DEP approval.

IV HAZARDOUS WASTE

- 1) Determination: 262.11/22a - 449(c) - 7

Inspector's Observation: Inadequate for solvent-contaminated waste oil.

Action Taken: New procedures have been written for sampling fluids being collected for waste oil and waste fuel and distributed 7/5/90. These new procedures will insure the proper identification of hazardous, nonhazardous or contaminated oil and fuels.

2) Containers: 265,170-177/22a-449(c)-33

Hazardous Waste Container Pad

a) Outside Roof and Berm, But Within Pad

Inspector's Observation: 14 drums, 9 portable transporters, few smaller containers, some without ID.

Action Taken: All containers were moved into the bermed area and properly identified.

b) Inside Roof and Berm

1) **Inspector's Observation:** Incompatible and generic waste types mixed together within each bay.

Action Taken: Incompatible waste has been properly separated.

2) Lack of Aisle Space

Action Taken: Adequate aisle space was implemented during the period of this inspection.

3) Liquid ponded in each bay with middle bay plug open to drain oily liquid.

Action Taken: Plug inserted to prevent discharge.

4) Labelling concerns, including unidentified Drums, no accumulation dates, duplicative markings.

Action Taken: All drums have been properly labeled.

5) Unsealed Covers

Action Taken: Covers were closed and sealed.

6) Corroded Drums

Action Taken: The corroded drums were overpacked or the contents transferred to acceptable containers.

7) No Accumulation Date

Action Taken: Personnel generating, handling and supervising the movement of waste have been reinstructed and trained in the proper identification, labelling and storing hazardous waste.

c) Outside Hazardous Waste Container Pad

Inspector's Observation: 18 empty drums, plus many smaller sized containers stored without secondary containment.

Action Taken: All have been moved into the bermed area or shipped to the TSDF.

Inspector's Observation: Pails Lack Hazard Determination.

Action Taken: All pails have been properly labeled.

d) At Electroplating Department

Inspector's Observation: Drums and cans of solids suspected of containing floor cleanups, CN sludge with no identification.

Action Taken: Sampled drums of unidentified materials and labeled accordingly. Those drums with drum "move codes," e.g., X106H identified as "Bonderide," were identified as raw materials and labeled accordingly.

Inspector's Observation: One can and three drums with loose or open tops.

Action Taken: Covered loose or open top drums were secured.

Inspector's Observation: One 360 gal tank at end of plating line containing concentrated CN solution has 10" visible sludge on bottom; not properly marked if RCRA waste tank needs secondary containment, inspections, etc.

Action Taken: The 360 gallon tank identified above is an in-process tank and is not an RCRA waste tank.

e) Satellite Waste Containers

1) Building 16

Inspector's Observation: Two drums hazardous waste liq (1,1,1 trichlor) from engine, 2 drums of D001 waste jet fuel, but funnel not locked (closed).

Action Taken: Full drums of hazardous waste were removed from the satellite storage area. Funnels were covered (put into closed position.)

Inspectors' Observation; Also, 275 gal satellite portable waste oil tank.

Action Taken: This tank collects CT regulated waste oil.

2) Outside Building 16

Inspector's Observation: One drum marked calibration fluid but Coded F001.

Action Taken: Drum was relabeled as D001.

3) Building 19

Inspector's Observation: 250 gal transporter collects "contaminated fuel, has chlor. solvent, approx. 1 foot of waste in it (lacks words hazardous waste").

Action Taken: This transporter was emptied and taken out of service.

3) Pretransport Requirements 262.30-34/22a-449(c)-7,8,33

a) b) c) Packaging, labeling, marking

Inspectors' Observation: Inadequate for several containers.

Action Taken: All containers were relabeled correctly and marked appropriately.

d) Accumulation Dates

Inspector's Observation: Lacking on several unidentified wastes.

Action Taken: Unidentified wastes were identified. The procedure regarding the proper identification and labeling including accumulation was reissued and emphasized to all operating departments and internal Transportation group.

4) Accumulation Storage Area 22a-449(c)-32.33

a) Number of Areas

Inspector's Observations: "Secondary at Plating Dept.

Action Taken: No action needed. The Plating Dept. is not a hazardous waste storage area.

b) Secondary Containment

Inspector's Observation: Yes, but some outside containment.

Action Taken: All drums at "primary" were moved to contained area.

Inspector's Observation: No for Plating Area.

Action Taken: The Plating Dept is not a hazardous waste storage area.

Inspector's Observation: No secondary containment for plating area as wastes sit atop open floor grates.

Action Taken: All waste was moved from atop open floor grates and placed in satellite area or hazardous waste storage area for proper disposal.

Inspector's Observation: One drum leaking.

Action Taken: The one drum leaking contained a raw material called Bonderite, not a hazardous waste. The drum was overpacked and removed from the operation.

5. Waste Tanks 265.190-199/22a-449(c) -34

Markings at (a)

Inspector's Observation: No markings, lacks "hazardous waste" on tanks.

Action Taken: Those tanks containing hazardous waste were marked accordingly.

Freeboard or Containment at e

Inspector's Observation: All have containment except 4000 gal waste oil tank (cross-contain?)

Action Taken: A review of the process design indicated that this tank was not intended to be a hazardous waste storage tank; therefore, it was not designed to have secondary containment.

Greater than 90-Day Storage at j

Inspector's Observation: Yes, for F001/F002 contaminated waste oil.

Action Taken: A schedule for emptying the tank within 90 day time frame has been established.

6. Manifests 262.21/22a-449(c)-5

Inspector's Observations: Several land ban discrepancies, plus improper waste identification and codings.

Action Taken: New procedures have been written for sampling fluids being collected for waste oil and waste fuel -- distributed week of 7/5/90. Those new procedures are intended to insure the proper identification of hazardous, nonhazardous, or contaminated oil and fuels.

7. Inspection Schedule and Log 265.15/22a-449(c)-23

a) Inspections conducted.

Inspector's Observation: No, for plating waste drums.

Action Taken: None required since this is not a storage area.

b) Inspection Log

(1) Daily

Loading/unloading at area subject to spills.

Inspector's Observations: Not daily.

Action Taken: Existing log for inspection modified to include daily inspections.

Discharge control equipment, waste levels in tanks.

Inspector's Observation: Not daily.

Action Taken: Procedure will be modified to be done on a daily basis.

2) Weekly

Containers

Inspector's Observation: Not weekly, log not detailed, not itemized, etc.

Action Taken: Procedure for logging of data has been changed and to improve the information collection.

Tanks

Inspector's Observation: Yes, but markings violations not logged.

Action Taken: Procedure for logging of data has been changed and to improve the information collection.

8. Personnel Training Records 265.16/22a-449(c)-24

a) Job Titles

Inspector's Observation: Waste handlers/movers not identified.

Action Taken: Waste handler/mover job descriptions are being modified to include their activities.

b) Training Completed

Inspector's Observation: Lacking for two individuals. Charles Culik, last trained 1/28/88 (has been 2nd Shift Supervisor since 1982).

Action Taken: Mr. Culik's responsibilities on 2nd shift do not require him to be trained in waste handling.

Inspector's Observation: Bill Goodman and John Fleming last trained 5/89.

Action Taken: Mr. Goodman and Mr. Fleming have had annual training since the inspection. In addition, Mr. Dennis has received three days of environmental training, 14 supervisors/managers have received additional training as departmental environmental coordinators.

Preparedness/Prevention 265.30-37/22a-449(c)-25

e) Testing and Maintenance of Equipment

Inspector's Observation: No, old rusty extinguisher at hazardous waste pad/maint. tag missing.

Action Taken: Fire extinguisher has been replaced with a new extinguisher.

f) Adequate Aisle Space

Inspector's Observation: No

Action Taken: Adequate aisle space was implemented during the period of this inspection.

9) Waste Analysis Plan

Facility Requirement

b) 3) Sampling Methods

Inspector's Observation: No

Action Taken: The Waste Analysis Plan is being reviewed to assure that the sampling methods employed currently are documented.

10) Operating Records 265.73/22a449(c)-27

Inspector's Observation: (Various)

Action Taken: Upon review of the regulations, this section which applies only to TSD's does not apply to the facility, a generator.

11) Closure Plan 265.112-115/22a-449(c)-29

b) Does Plan Include:

Inspector's Observation: In Items 1 through 6 draw several conclusions about inadequacy of plan.

Action Taken: The Closure Plan was certified. The Closure Plan is being reviewed for timeliness and accuracy.

12) Post-Closure Cost Estimate

Estimate adjusted annually on 11/19 for inflation.

Inspector's Observation: No, 1987 cost estimate.

Action Taken: The cost estimate for post closure is being revised to include inflation.

13) Waste Piles 265.250-.257/22a-449(c)-36

Inspector's Observation: Approximately 11,000 yds solvent contaminated soil, uncertain if to handle as hazardous waste.

Action Taken: The "waste pile" referred in this section is not a hazardous waste. [See Page 2, Item (5)]