

TEXTRON Lycoming

Stratford Division
Textron Lycoming/
Subsidiary of Textron Inc

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VIA OVERNIGHT MAIL

August 1, 1991

Merrill S. Hohman
Director, Waste Management Division
U.S. Environmental Protection Agency (HRW-CAN3)
Waste Management Division
John F. Kennedy Federal Building
Boston, MA 02203-2211

Attn: RCRA Support Section, Enforcement Unit

Re: AVCO Corporation, Textron Lycoming Division
RCRA Docket No. 1-91-1078
Compliance Certification

Dear Mr. Hohman:

AVCO Corporation, Textron Lycoming Division ("Textron Lycoming") is required to submit written certification of its compliance with Paragraphs 1-6 of the above-referenced Order, with appropriate supporting documentation, within 30 days of its receipt of the Order. On July 22, 1991, Textron Lycoming forwarded to the EPA a motion for extension of time to consider the EPA's request for documentation as outlined in the Order. This motion was filed based on counsel's belief that the EPA's Assistant Regional Counsel had agreed to an extension of time. During an informal settlement conference between the EPA and Textron Lycoming on July 25, 1991, however, it was determined that there was some miscommunication between counsel and that the EPA would not authorize an extension of time to file this certification. Subsequently, Textron Lycoming agreed to comply with the Order and submit documentation to the EPA by August 2, 1991 (30 days from Textron Lycoming's formal receipt of the Order), to the best of its ability given the misunderstanding between counsel. The EPA has agreed to allow Textron Lycoming to supplement any submitted documentation within 30 days without the imposition of any fine or penalty.

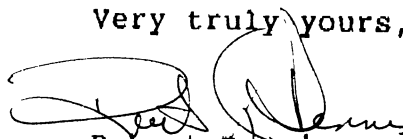
Therefore, in accordance with Paragraph 7 of the Order, Textron Lycoming hereby certifies the following:

- (1) Pursuant to paragraph 1 of the Order, enclosed please find a copy of Textron Lycoming's written procedure to ensure that future shipments of wastes are correctly classified.

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- (2) Pursuant to paragraph 2 of the Order, enclosed please find documentation of the training that William Goodman and John Fleming received following the EPA and DEP inspection of June 5-8, 1990. Also, enclosed is a copy of Textron Lycoming's personnel training records as required by paragraph 2 of the Order.
- (3) Pursuant to paragraph 3 of the Order, enclosed please find a sample of the type of notification Textron Lycoming currently sends to treatment, storage or disposal facilities to indicate that the hazardous wastes are prohibited and/or restricted from land disposal.
- (4) Pursuant to paragraph 4 of the Order, Textron Lycoming hereby certifies that, to the best of its knowledge and belief, immediately upon its receipt of the Order, Textron Lycoming ceased the shipment of all Land Disposal Restricted wastes without proper notification.
- (5) Pursuant to paragraph 5 of the Order, Textron Lycoming hereby certifies that, to the best of its knowledge and belief, immediately upon its receipt of the Order, Textron Lycoming complied and continues to comply with the requirements for the storage of hazardous waste within the less than 90 day storage areas.
- (6) Pursuant to paragraph 6 of the Order, Textron Lycoming hereby certifies that, to the best of its knowledge and belief, immediately upon its receipt of the Order, Textron Lycoming complied and continues to comply with the requirements for aisle space within the less than 90 day storage area.

Very truly yours,



Robert Dennis
Director, Manufacturing Services

cc: William L. Parker, Esq., EPA
Deborah Brown, Esq., EPA
Lawrence O'Connell, Esq.
Douglas A. Cohen, Esq.