



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



May 12, 1992

Mr. John Fleming
Chief, Environmental Compliance
Avco Lycoming Textron
550 Main Street
Stratford, Connecticut 06497-2452

Subject: RCRA Closure Certification and Related Documents
Surface Impoundments
EPA I.D. No. CTD001181502



Dear Mr. Fleming:

The Connecticut Department of Environmental Protection (CTDEP) Site Remediation and Closure Division has reviewed the closure certification documents attached to cover letters dated July 25, 1990, and September 11, 1990. The documents were submitted by Schatz attorneys on behalf of Avco Lycoming Textron (Avco). These documents were submitted pursuant to the requirements of the approved closure plan dated September, 1987 as amended September 30, 1987, January 5, 1988, February 24, 1988, and as amended by the closure plan approval letter dated April 5, 1988.

As a result of this review, the CTDEP has determined that additional information is needed before CTDEP can determine whether the hazardous waste management units have been closed in accordance with the specifications in the approved closure plan.

Specific comments are included as Attachment 1 to this letter. Please revise the closure certification documents based on these comments and submit them to the CTDEP no later than 60 days after receipt of this letter.



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To assist CTDEP in reviewing the revised certification documents, please prepare a summary of the revisions made. This summary should direct the reviewer to the page and/or section of the documents where each comment in Attachment 1 was addressed. In addition, it would be helpful to receive the documents in a single bound report.

Very truly yours,



David Ringquist
Sanitary Engineer III
Site Remediation And Closure Division
Waste Management Bureau

DR:dr
Attachment
cc: George Dews, CTDEP WEED Permits
<AVCOCERT.NOD>

**AVCO LYCOMING TEXTRON
Stratford, Connecticut**

REVIEW COMMENTS ON CERTIFICATION DOCUMENTS

1. The certification of closure must be resubmitted as an original with a legible professional engineer's stamp.
2. The certification of closure references a closure plan dated March, 1988. This must be changed to agree with the closure plan dates in the closure plan approval letter.
3. The As-Built Drawings must be modified to include the following:
 - A. Direction of run-off in the stone swale shown on Closure Area 1.
 - B. Point of discharge of run-off for Closure Areas 1 and 2.
 - C. Typical cap cross-section for Closure Areas 1 and 2, with section location shown on plan view.
4. To support the departure from the approved closure plan, demonstrate that the as-built final topographic contours and run-on/run-off controls for Closure Area 1 are technically equivalent to those specified in the approved closure plan.
5. The 12 foot vegetated drainage channels for Closure Areas 1 and 2 which are shown on Figure 4-2 of the approved closure plan do not appear on the as-built drawings and were not observed to be present in the field. 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.
6. The "perimeter test for hazardous waste quantity determination", included as Item 4 of the closure certification letter dated July 25, 1990, was not found in the closure documents. Please provide this information.
7. The soil verification test results must be accompanied by a map showing the sample locations, including depths below grade. Any deviation from the soil sampling procedures, as required by Modification Number 3 of the closure plan approval letter, must be demonstrated to be equally protective of human health and the environment.

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8. The soil verification test results must be presented with the clean criteria that were developed to define the limits of the excavation. As required by Modification Number 1 of the closure plan approval letter, criteria for both the groundwater exposure pathway and the direct ingestion pathway must be provided. Provide the source or calculation used to derive each clean criteria value.
9. The Appendix IX test results must be prefaced by a description of the sample media (waste, soil), the sampling technique, and the sampling locations. Explain why the analysis was performed even though it is not required by the closure plan.
10. Provide a topographic survey of the final excavation as required by the approved closure plan.
11. The limit of excavation must be shown relative to the footprint of the synthetic membrane cap.
12. The synthetic membrane warranty was not found in the closure documents. Please provide this document.
13. Provide a list of departures from the approved closure plan together with a demonstration that each departure is equally protective of human health and the environment.
14. As required by the approved closure plan, provide the logs recorded during monitoring well replacement.
15. Provide a description of the storm water pipeline (from the adjacent contaminated soil piles) which runs diagonally across Closure Area 2. Include the length of time the pipeline will be there, its purpose, and how the pipeline and landfill will be inspected and maintained to meet the requirements of 40 CFR 265.117(c). This regulation states that "post-closure use of the property...must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of the containment system...".

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