



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



September 25, 1992

Mr. James Runstadler
Manager
Environmental Services
Textron Lycoming
550 Main Street
Stratford, Connecticut 06497-2452



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

Dear Mr. Runstadler:

The Connecticut Department of Environmental Protection (CTDEP) Waste Engineering and Enforcement Division has reviewed the closure certification document dated August 11, 1992. This document was 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. The closure certification document was revised in response to a letter from CTDEP dated May 12, 1992.

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 an attachment to this letter. Please revise the closure certification document based on these comments. Revised pages (dated) can be submitted for placement into the August 11, 1992 document. Submit the revisions to the CTDEP no later than 30 days after receipt of this letter. 10/25

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To assist CTDEP in reviewing the revised certification document, please prepare a summary of the revisions made. This summary should indicate the page and/or section of the document where each comment in the attachment was addressed.

Very truly yours,

A handwritten signature in black ink, appearing to read "David A. Nash". The signature is written in a cursive style with a large initial "D".

David A. Nash
Director
Waste Engineering
and Enforcement Division
Waste Management Bureau

DAN:DR
Attachment

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**AVCO LYCOMING TEXTRON
Stratford, Connecticut**

REVIEW COMMENTS ON CERTIFICATION DOCUMENTS

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.
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 CTDEP 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.