



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

September 16, 1987

Mr. John Fleming, Chief  
Environmental Compliance  
AVCO Lycoming Textron  
550 South Main Street  
Stratford, CT 06497



Re: Closure Plan for AVCO Lycoming Textron

Dear Mr. Fleming:

In a letter dated September 16, 1987, the Connecticut DEP and EPA transmitted to you comments on the Hazardous Waste Closure Plan for AVCO Lycoming Textron, Stratford Army Engine Plant located in Stratford, Connecticut. Subsequent to that letter we received comments in response to a Public Notice of the closure plan. Please revise the closure plan to address the comments in the joint DEP/EPA letter dated September 16, 1987 (cited above) as well as addressing the comments listed below:

1. If portable roll-off boxes are to be used for the storage and transport of the filter cake and soils, these containers should also be lined with a synthetic liner to prevent leakage of liquids during storage and transportation.
2. The polyethylene ground cover that is to be used for temporary storage of the piping and pump station may not provide adequate control of run-on and run-off, unless it is specifically installed to do so. Also, the materials stored on this ground cover should be covered at all times, not only at night.
3. The design drawings should indicate that the membrane liner and the geotextile filter fabric will be anchored at the edges. The current drawings imply that these edges will not be anchored in any way, which could allow slippage of the material and resultant decrease in its performance.
4. The vegetated drainage channels should be located far enough away from the edge of the cap that any erosion in these channels will not threaten the integrity of the cap.

Please submit one copy of the revised plan to each agency by September 25, 1987.

If you have any questions concerning these comments please contact either Kenneth Feathers (203) 566-1847 or myself at (617) 223-1369 at your earliest convenience.

Sincerely,



Robert Leger  
Environmental Scientist  
CT Compliance and Enforcement Section

cc: Carmine DiFilippo  
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Commander  
USAVSCOM  
ATTN: AMSAV-EMC/Mr. Todd Riggs  
4300 Goodfellow Boulevard  
St. Louis, MO 63120-1798

Kenneth Feathers  
CT DEP