

TEXTRON Lycoming

Stratford Division
Textron Lycoming /
Subsidiary of Textron Inc.

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Stratford, CT 06497
203/385-2000

April 25, 1990

Mr George Dews
Senior Sanitary Engineer
Hazardous Waste Management Section
CT Dept Environmental Protection
165 Capitol Avenue
Hartford, CT 06106

Fax (203) 566 5255

Re: Waste Classification

Dear Mr. Dews:

As per our telephone conversation, we are sending copies of analyses of samples of soil taken in a construction site area at the Stratford Army Engine Plant. The samples are numbered and an included map of the area can be used to identify where the samples were taken.

What is being questioned is the classification of the soil given the varying and low levels of various (Specifically four - Benzene, MEK, Methylene Chloride and 1,1,1-Trichloroethane) materials present in some areas of the site. The source of the material is unknown. It certainly did not come from any known spill or release in the last ten to fifteen years. There is a good possibility that the area has traces of materials from many past years of the facility's operations and possibly from the fill used to produce this area when it was constructed by filling or expanding the shoreline of the river in the 1943 to 1950 period.

Construction of a new building addition cannot be continued until the contaminated soil is removed. Classification of the soil as a waste (regulated or hazardous ?) will guide the actions and direction for construction work.

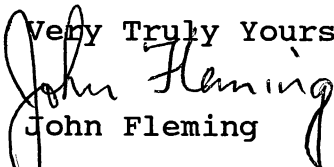
If CT regulated (Hydrocarbon containing), would it be possible to remove the soil to a secured area for temporary storage (covered, bermed on a non-porous base with restricted access) to allow continued work and to obtain approval of a site for disposition of the soil? - perhaps for ten to fifteen days.

If hazardous, the soil would not be moved until disposition was arranged to allow manifesting and handling of the soil as required for disposition at a permitted facility.

Mr. M. Bamberger has been made aware of our situation and also has copies of soil analysis and our intentions.

Would you please review the data and let us know what you think.

Very Truly Yours,


John Fleming

(203) 385 3964