



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



September 16, 1987

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



Dear Mr. Fleming:

We have reviewed the Hazardous Waste Closure Plan for AVCO Lycoming Textron, Stratford Army Engine Plant, Stratford, Connecticut, dated June 1987, for conformance with the closure and post-closure requirements of 40 CFR Part 265 Subpart G, and Section 22a-449(c)-29 of the Connecticut General Statutes, and have attached our comments.

The public has also been given the opportunity, through a Public Notice on August 12, 1987, to review the plan however no comments have been received. Please revise the plan to address the attached comments and submit one copy to each agency by September 25, 1987.

If you have any questions please contact the undersigned.

Sincerely,

Kenneth Feathers  
Sanitary Engineer  
Hazardous Waste Management Section  
CT Department of Environmental  
Protection  
(203) 566-1847

  
Robert Leger

CT Waste Regulation Section (HER-CAUS)  
U.S. Environmental Protection Agency  
(617) 223-5901

Phone:

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cc: Carmine DiFilippo  
Metcalf and Eddy, Inc.  
P.O. Box 4043  
Woburn, MA 01888-4043

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

KF/sm  
Enclosures

### NOTICE OF DEFICIENCY

Interim Status (Part 265) Surface Impoundment Closure/Post-Closure Plan  
Avco Lycoming Textron, Stratford, Connecticut, dated June 1987  
(CTD001181502)

#### GENERAL COMMENTS

- All submittals must be to both the Regional Administrator of the USEPA and the Commissioner of the CTDEP. Certifications must be submitted by registered mail.
- Because more than one contractor may be used to perform closure work, EPA and DEP must be notified should a contractor choose to deviate from the specifications in the approved closure plan.

#### CLOSURE PLAN

- Note that this is a partial closure plan for only the surface impoundments, which is not reflected in the document title.
- 2 -3 The correct regulatory citation for closure time allowed is 40 CFR 265.113. The amount of time for closure in excess of 180 days must be stated.
- 4-22 The appropriate regulatory citation concerning Avco's obligation to restrict disturbance of the landfill is 40 CFR 265.117(c).

#### Material Removal

- 4-9 Provision must be made to inspect areas of removed piping for evidence of leakage and remove contaminated soil.
- 4-12 It is unclear if contaminated pipes, building materials and soils will be disposed of at Stablex. State the permitted RCRA facility where this material will be disposed.
- Permission must be obtained from CTDEP Water Compliance Unit for the additional treatment plant inputs.
- Provide additional details of measures to be taken to prevent release of hazardous constituents to the environment, and remediate any accidental releases, during sludge removal, soils removal, temporary stockpiling, and decontamination.

#### Verification Testing

- 4-7 Provide justification for the proposed sampling density.
- 4-7 Specifically provide for additional samples at any "hot spots" identified by visual or OVA screening.

- Appendix B Use of 120 ml (4 oz) wide mouth glass bottles with teflon lined caps is recommended for soil volatile organic sampling.
- Appendix B Provide details of sample shipping, chain of custody, and field QA/QC procedures to be used.

#### Decontamination

- 4-14 Indicate method of disposal of dirt removed from equipment.
- 4-15 Indicate criteria to be used to determine equipment is decontaminated.
- 4-15 Indicate method to be used to determine rinse waters are "clean".
- 4-15 List general categories of equipment (eg pumps, piping, earth moving equipment, hand tools, protective clothing, etc.) and delineate how each will be decontaminated or disposed.

#### Landfill Cap

- Provide additional design detail for the edge of the cover, specifically how the membrane and drainage layer relate to the drainage swale.
  - Provide design calculations for the drainage swale indicating it can accommodate expected runoff from severe storms.
  - Demonstrate the 1:3 side slopes are not subject to excessive erosion, using the universal soil loss equation and a limit of 2 Tons/acre for comparison.
  - Provide an expanded discussion of methods used for construction QA/QC, especially with respect to backfill control, membrane placement, and slope verifications. Please refer to the July 1986 EPA Technical Guidance Document titled Construction Quality Assurance for Hazardous Waste Land Disposal Facilities.
- 4-18, 20 Submit manufacturer's specifications for the membrane and filter fabric and append copies of referenced ASTM specifications.

#### Certification

- 4-22 Documentation of closure certification must be made available upon request. The closure plan should delineate supervision activities by the independent engineer or his representative sufficient to support the required certification. Documentation, such as inspection reports daily activity logs, and field notes, is desired.

## POST-CLOSURE PLAN

- Provision must be made for submittal of the post-closure notices required by 40 CFR 265.119. Ideally these should state the amount and type of waste originally present, the vertical and horizontal removal criteria, and results of verification sampling.
- Provision must be made for certification of completion of post-closure care as required by 40 CFR 265.120.
- 7-1 Replacement wells 1, 2, 3, and 5 and the well point must not be placed in areas that will compromise the integrity of the membrane. The wells should be placed at the limit of the membrane and not in areas that would require the wells to pierce the membrane. Well construction should be to standards set forth in the EPA RCRA Groundwater Monitoring Technical Enforcement Guidance Document (1986).

### Inspections

- 7-2 Add monitoring well condition to the inspection list.
- 7-3 Delineate specific evaluation criteria, including triggers for remedial action, for each inspection item. Describe the proposed methods of remediation for any identified deficiencies and implementation time frames.

### Maintenance

- Describe in detail routine maintenance procedures to be conducted during the post-closure period such as mowing (including frequency) and drainage ditch clearing.

### Cost Estimate

- 8-1 Supply a detailed breakdown of post-closure cost estimates.