



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

June 22, 1992

Robert F. Kelley, Manager
Environmental Services
Textron Lycoming
550 Main Street
Stratford, CT 06497

EPA I.D. No. CTD001181502

Dear Mr. Kelley:

This letter is in response to your request for the U.S. Environmental Protection Agency (EPA) to review the corrective action investigation work plan and subsequent remedial activities you plan to conduct at Textron Lycoming (Textron) - Stratford Army Engine Plant (SAEP), in Stratford, CT. Representatives from EPA, the Army, and Textron met on April 30, 1992 in Boston to discuss several issues, including your future investigatory and cleanup plans and, more specifically, the Remedial Investigation Work Plan dated January 1992 which was submitted to EPA for comments. At this time, EPA Region I cannot provide technical comments or approvals regarding remedial activities at your facility.

EPA is establishing a system which considers the environmental significance and the environmental priority of each RCRA facility. This analysis of the facility is used as a guide in allocating EPA resources to facility specific corrective action oversight. Due to finite resources, Region I is able to oversee and approve corrective action activities at only a limited number of RCRA facilities at a time. Further, it is EPA's experience that in most cases resources are best utilized overseeing enforceable corrective action requirements governed by administrative orders or permits.

For these reasons, EPA cannot at this time provide technical comments on SAEP's work products nor can we approve or disapprove the adequacy of these documents with regard to EPA's corrective action program.

It should be noted that SAEP is among those RCRA facilities which will be addressed for corrective action by EPA. As you are aware, EPA and its contractors have already conducted a RCRA Facility Assessment (RFA) on the SAEP facility. The preparation of the RFA included a Visual Site Inspection (VSI) at the facility on December 19, 1991.



You are not discouraged to proceed with your investigative activities; however, be advised that when EPA initiates corrective action at SAEP, all applicable RCRA corrective action regulations and guidances will be followed. It is crucial, therefore, that all activities at your facility are fully documented and all decisions are supportable. This documentation should include, but not be limited to, a detailed description of remedial measures taken and analytical data of representative confirmation samples of residual contamination levels. The documentation should also include all aspects of an investigation such as procedures for and the implementation of accurate data validation, a compilation of your Standard Operating Procedures (SOPs), and the inclusion of all assumptions used in risk calculations. The facility's clean up decisions should be based on the most recent health-based standards and should be completely documented.

You should also be aware that EPA has authorities for compelling hazardous waste remediation under both RCRA and CERCLA. Current Superfund listing policies make it unlikely that your facility will be proposed for the NPL while your facility continues to operate. However, your facility will be considered for corrective action as is required of all treatment, storage, and disposal facilities under the Hazardous and Solid Waste Amendments (HSWA) of 1984. It is advised that the remedial investigation at your facility adhere to the procedures and protocols of the RCRA corrective action program.

Although EPA cannot provide technical reviews or issue approvals for activities at your facility at this time, it is recommended that final copies of all relevant reports be submitted to the Waste Management Division Record Center (US EPA Region I, JFK Federal Building, Waste Management Division, Mail Code HES-CAN6, Boston, MA 02203). These documents may be easily referenced by Region I staff when appropriate. It is anticipated that at EPA's initiation of the corrective action process, you will be required to submit a Current Assessment Summary (CAS) to EPA. The CAS usually includes a synopsis of remedial activities at the site and statements to the current conditions at the facility.

To aid in your investigatory activities and to guide your decisions, an attachment has been provided which lists those documents which will be of most use to you during your remedial activities. These documents represent current EPA policies and protocols for performing corrective action investigations and instigating remedial activities at RCRA facilities. The list indicates where you may obtain these documents.

This letter also serves as a reminder that all activities at SAEP must be carried out within the bounds of all Federal, State, and

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local statutes and regulations. Most remedial actions (e.g., incineration, bioremediation, air stripping, waste storage over 90 days, discharge of treated waters, etc.) will require permits. All permits must be obtained from the applicable authority prior to the commencement of such action. The state of Connecticut has authorization to implement the majority of EPA's statutes which may require permitting, such as air, water, and hazardous waste.

If you have any questions or comments about this letter or Region I's corrective action program, or would like to discuss examples of reviewed corrective action work products, please contact Deborah McKie of my staff at (617) 573-5789.

Sincerely,

Anna W. Keighton ACTING FOR

Merrill S. Hohman, Director
Waste Management Division

cc: Alan McDermott, US Army
John S. Fleming, Textron Lycoming
Randal K. Petersen, ACOE, Omaha

Enclosure (1)

ATTACHMENT I
SUGGESTED GUIDANCE

CORRECTIVE ACTION GUIDANCES

1. A copy of the RCRA Facility Assessment (RFA) or Preliminary Assessment (PA/PA+) performed by EPA Region I at your facility. (Available by calling Deborah McKie at (617) 573-5789.)
2. "Corrective Action for Solid Waste Management Units (SWMUs) at Hazardous Waste Management Facilities," Proposed 40 CFR Subpart S regulations, 55 FR 30798, July 27, 1990. [NOTE: This proposed rule should only be used as a general guide for EPA's current corrective action program. This proposal will be immediately superseded at such time this rule is re-proposed or made final.] (Available from RCRA/CERCLA Hotline, OSW-FR-90-012.)
3. RCRA Facility Assessment Guidance, OSWER Directive 9502.00-5, October 1986. (Available via Freedom of Information Act Request.)
4. Handbook: Stabilization Technologies for RCRA Corrective Actions, EPA/625/6-91/026, August 1991. (Available from ORD Publications Office.)
5. Interim Final RCRA Facility Investigation (RFI) Guidance, Volumes I - IV, EPA/530/SW-89-031, May 1989. (Available from NTIS, PB-89-200299.)
6. Corrective Measures for Releases to Ground Water from SWMUs, Draft Final, EPA/530-SW-88-020, March 1985. (Available from NTIS, PB-88-185251.)
7. Technical Guidance for Corrective Measures -- Determining Appropriate Technology and Response for Air Releases, Draft Final, EPA/530-SW-88-021, March 1985. (Available from NTIS, PB-88-185269.)
8. Corrective Measures for Releases to Soil from SWMUs, Draft Final, EPA/530-SW-88-022, March 1985. (Available from NTIS, PB-88-185277.)
9. Technical Guidance for Corrective Measures -- Subsurface Gas, EPA/530-SW-88-023, March 1985. (Available from NTIS, PB-88-185285.)
10. RCRA Corrective Action Decision Documents: The Statement of Basis and Response to Comments, OSWER Directive 9902.6, February 1991. (Available from NTIS, PB-91-201756.)

RISK ASSESSMENT GUIDANCES

11. Supplemental Risk Assessment Guidance for the Superfund Program, EPA 901/5-89-001, US EPA Region I, Draft Final June 1989.
12. "Human Health Evaluation Manual, Supplemental Guidance: Standard Default Exposure Factors," OSWER Directive 9285.6-03, March 25, 1991. (Available from NTIS, PB-91-921314.)
13. Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (Part A), Interim Final, EPA/540/1-89/002, December 1989. (Available from NTIS, PB-90-155581.)
14. Risk Assessment Guidance for Superfund, Volume II: Environmental Evaluation Manual, Interim Final, EPA/540/1-89/001, March 1989. (Available from NTIS, PB-90-155599.)
15. Guidance for Data Useability in Risk Assessment, EPA/540/G-90/008, October 1990. (Available from NTIS, PB-91-921208.)

RISK ASSESSMENT DATABASES

16. Integrated Risk Information System (IRIS) is an EPA data base containing up-to-date health risk and EPA regulatory information for numerous chemicals. It is EPA's preferred source of toxicity information. For information on how to access this data base, call IRIS User Support at (513) 569-7254.
17. Health Effects Assessment Summary Tables (HEAST) is a tabular presentation of toxicity information and values for various chemicals, including interim and verified RfDs and slope factors as well as other toxicity information for specific chemicals. HEAST can be obtained from the Superfund Docket at (202) 260-3046.

TELEPHONE NUMBERS

EPA Region I Record Center (Arrangements must be made with a Boston copying company if more than 20 pages need to be copied.)	(617) 573-5729
RCRA/CERCLA Hotline	1-800-424-9346 or (703) 820-9810
ORD Publications Office	(513) 569-7562
National Technical Information Services (NTIS) (There is a fee for documents ordered through NTIS.)	(703) 487-4650
Voluntary Corrective Action Suggested Guidance	