## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 1 1 CONGRESS STREET, SUITE 1100 BOSTON, MASSACHUSETTS 02114-2023

April 17, 2003

Christine Lacas, Supervising Environmental Analyst Connecticut Department of Environmental Protection Bureau of Waste Management, Remediation Section 79 Elm Street Hartford, CT 06106-5127

James R. Davidson Director, National Capital Region Field Office U.S. Army Installation Support Management Activity 5001 Eisenhower Avenue Alexandria, VA 22333-0001

Re: EPA Region 1 Disinvestment from the Stratford Army Engine Plant in Stratford, CT

Dear Ms. Lacas and Mr. Davidson:

As you know, the Connecticut Department of Environmental Protection (CTDEP) is the lead regulatory agency for environmental oversight at the Stratford Army Engine Plant (SAEP) in Stratford, CT. EPA has provided some technical assistance at this site. After much deliberation and discussion with other parties, I have decided that EPA should curtail its involvement at the SAEP for several reasons outlined below.

Since the site is not listed on the NPL, EPA's role has been limited to technical assistance under the BRAC program. While EPA understands the Army's interest of eliminating its caretaker bills, EPA is also aware of the challenges involved in redevelopment and reuse at the site. Since BRAC resources are primarily targeted for use at bases where expedited cleanup can enhance reuse, it does not appear appropriate to continue to accept such resources for SAEP given the pace of the cleanup and the uncertainty associated with the reuse plans.

EPA believes that the CTDEP has the necessary legal authorities to oversee the Army environmental work at the site. Moreover, EPA is in the process of delegating the RCRA program to the CTDEP. As a result, if Superfund investigation and cleanup plans are insufficient, the State will have additional tools to take appropriate enforcement action under either RCRA or the State's Remediation Standard Regulations.

Therefore, I have decided not to provide technical comments on the current RI/FS at SAEP. EPA will also cease any future BRAC FTE charges to the SAEP account number. BRAC resources for the SAEP will be eliminated from future year planning in Region I.

EPA appreciates the opportunity to work with you on this project and trusts that the environmental investigation and cleanup at SAEP will proceed smoothly. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Acting Chief Federal Facilities Superfund Section

cc: Wesley La Parl, SAEP, Stratford, CT
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