

September 14, 2000

Ms. Susan Gradante Connecticut Department of Environmental Protection Office of Long Island Sound Program 3rd Floor 79 Elm Street Hartford, CT 06106-5127

Subject: Barge Drilling at the Causeway Stratford Army Engine Plant Stratford, Connecticut

Dear Ms. Gradante,

The purpose of this letter is to address Connecticut Department of Environmental Protection concerns relative to the geotechnical drilling operations scheduled to be conducted on the tidal flats surrounding the Causeway at the Stratford Army Engine Plant (SAEP) facility in Stratford, Connecticut. The drilling program is scheduled to begin on September 18, 2000 and continue through October 13, 2000. This drilling is in support of the Causeway Non-time Critical Removal Action Design for the SAEP.

The first concern is the fate of the generated drill cuttings and drill water while drilling on the tidal flats, and prevention of spreading contaminants to the surface of the tidal flats. Our plan is to collect and contain all drill cuttings and water, and to place these on the ground surface of the Causeway. We do not plan to discharge the drilling water or cuttings to the tidal flats.

Secondly, CTDEP has expressed a desire to minimize the potential for erosion of the tidal flats during the drilling operation. To address this concern, we plan to do two things; first, we will move the barge into deeper water prior to a significant storm event; and secondly, when placing the barge, we will point a corner of the barge into the oncoming waves to deflect and minimize some of the wave energy.

The last concern is relative to permitting, which is normally required when conducting work in tidal flats. After talking with you and Ken Feathers, it is our understanding that permits will not be necessary to complete this phase of work at the SAEP since actions taken under the Comprehensive Environmental Response, Cleanup and Liability Act (CERCLA) do not require permits.

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If you have any questions regarding these issues, please feel free to contact me at (207) 775-5401.

Sincerely,

HARDING ESE A MACTEC Company

D. Roderick Perdleton

Nelson Walter, P.E. Project Manager

> Cc: J. Burleson M. Brock J. Frye K. Feathers