August 8, 2001

Mr. John Burleson BRAC Environmental Coordinator Stratford Army Engine Plant Main Street Stratford, CT 06497

Re: Non-Time Critical Removal Action Basis of Design 90% Causeway Design Stratford Army Engine Plant Stratford, Connecticut

Dear Mr. Burleson:

The United States Environmental Protection Agency (EPA) has reviewed the Phase II portion of the document entitled "Non-Time Critical Removal Action, Basis of Design, 90% Causeway Design, Stratford Army Engine Plant, Stratford, Connecticut".

EPA's comments on the above-referenced information are provided below.

1. Page 2-19, Section 2.7.5.3, Upper Cover System Components, Non-woven Geotextile: It appears that the proposed non-woven geotextile should have an apparent opening size equal to a 70 sieve. However, the apparent opening size of the non-woven geotextile in Table 1 on Page 3 (Attachment B Phase II Technical Specifications), is #40. Please clarify this difference and correct as appropriate.

2. Page 2-19, Section 2.7.5.3, Gravel, 3rd sentence: The text indicates that "The gravel will be spread over the entire surface of the upper cover system." Spreading the gravel layer without being placed with compactness (or tightness) may cause mixing of gravel and the overlying vegetative soil layer and/or has the potential loss for the topsoil. EPA suggests using a geotextile between the topsoil and the gravel as a separator and filter.

3. Attachment B, Phase II Technical Specifications, Section 02921, Page 5, Finished Grade and Topsoil: the placing of topsoil, smooth grading, and compaction requirements are not specified in Section 02300 Earthwork. Please provide the grading information as appropriate.

If you have any questions regarding these comments, please contact me at (617)918-1387. Sincerely,

Meghan F. Cassidy, RPM

4

cc: Ken Feathers/CT DEP

Yoon-Jean Choi/EPA