



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY TANK-AUTOMOTIVE AND ARMAMENTS COMMAND  
WARREN, MICHIGAN 48397-5000

REPLY TO  
ATTENTION OF

13 JAN 1997

AMSTA-RM-XS

MEMORANDUM THRU Commander, U.S. Army Tank-automotive and Armaments  
Command, ATTN: AMSTA-RM-X (William R. Schultz),  
Warren, MI 48397-5000 *W. Schultz 1/13/97*

FOR Commander, U.S. Army Materiel Command, ATTN: AMCEN-R (Don Carter),  
5001 Eisenhower Avenue, Alexandria, VA 22333-0001

SUBJECT: Report of Availability and Finding of Suitability to Lease for Buildings 65  
and 58 at Stratford Army Engine Plant (SAEP)


1. Enclosed is the Report of Availability (ROA) for the proposed interim lease of Buildings 65 and 58 and one acre of the North parking lot at Stratford Army Engine Plant (SAEP) to the State of Connecticut (Attachment A). The proposed interim lease authorizes the State of Connecticut to sublease this property to Index Corporation, Shelton, Connecticut. Enclosed please find the Finding of Suitability (FOSL) (Attachment B w/14 enclosures), one of the supporting documents for this leasing action. In addition, a Record of Environmental Consideration (REC) and the Environmental Baseline Survey Report Summary (EBS Summary) are included as enclosures to the FOSL.

2. Point of contact for this action is the undersigned at (810) 574-8812 or DSN 786-8812.

Attachments

- A. ROA
- B. FOSL (w/14 enclosures)
  - Encl 1. SAEP Site Map
  - Encl 2. CTDEP Concur in EBS
  - Encl 3. REC

(CONT)

  
PETER W. SZYMANSKI  
Installation Manager  
Stratford Army Engine Plant

AMSTA-RM-XS

**SUBJECT: Report of Availability and Finding of Suitability to Lease for Buildings 65 and 58 at Stratford Army Engine Plant (SAEP)**

(CONT)

- Encl 4. Notice of Haz. Subst. Releases  
& Spills Chart
- Encl 5. Env'tl Baseline Survey Report Summary
- Encl 5a. CERFA Parcelization Map
- Encl 5b. Notice of Haz. Subst. Releases  
& Spills Chart
- Encl 6. Cultural Resources MOA
- Encl 7a. SAEP Notice Ltr to USFWS
- Encl 7b. USFWS Concur in SAEP Notice Ltr
- Encl 8. Radiation Survey Results
- Encl 9. Lease Environmental Protection Provisions
- Encl 10a. SAEP Request for Comments re: FOSL  
to USEPA, Region I and CTDEP
- Encl 10b. USEPA, Region I and CTDEP Comments  
to FOSL

CF:

AMC, AMCCC-G (Edgell)  
TACOM, AMSTA-LA (Kristoff)  
TACOM, AMSTA-RM (Gianfermi)  
TACOM, AMSTA-RM-B (Kaspari)  
TACOM, AMSTA-RM-XE (Park)  
TACOM, AMSTA-RM-XEM (Tighe)  
TACOM, AMSTA-RM-XS (Hyatt)  
USACE-NY (Anglada)  
USACE-NY (Crifasi)

ATTACHMENT A

SAEP REPORT OF AVAILABILITY (ROA)

**HEADQUARTERS, DEPARTMENT OF THE ARMY**  
**Instructions for Preparing a Report of Availability (ROA)**  
**6/11/96**

These instructions are to be used to carry out the policy issued by the Deputy Assistant Secretary of the Army for Installations and Housing (DASA (I&H)) memorandum, 16 Jan 96, subject: Leasing of BRAC Properties.

Except for Section A, the ROA is a checklist. Sections B and C are designed to incorporate all data necessary to complete a lease on the subject property and show the issues which were considered throughout the chain of command. The ROA format is set up so that different sections can be prepared and staffed separately and signed by different Army elements, if required.

- Section A is the Determination of Availability and is signed after Sections B and C have been completed, reviewed, and approved. Until further notice, the Determination of Availability will be executed by the DASA (I&H).
- Section B is the general and operational information for making property available.
- Section C contains environmental considerations.

The MACOM is responsible for the completion, accuracy, and approval of Sections B and C prior to forwarding to HQDA for final review and approval. MACOM signatory for Sections B and C is to be the MACOM Commander or someone authorized to sign for the MACOM Commander.

The ROA package is to be forwarded to HQDA via a cover memo which states that staffing within required MACOM offices (BRAC, environmental, legal, and real estate) has been completed and is to include attachments necessary to support the ROA, including but not limited to maps and the Finding of Suitability to Lease (FOSL)\*. National Environmental Policy Act (NEPA) documentation\*\* and Environmental Baseline Surveys are not required to be attached to the ROA as long as they have been previously provided to HQDA in sufficient copies. When responding to an item for which the answer is contained in a document previously submitted to HQDA (in sufficient copies), clearly identify where the answer is located (i.e., document title, date, page, paragraph, etc.).

Additional information can be provided by Mr. Gary Paterson (202-761-0520) for real estate issues and Ms. Robin Mills (703-693-0679) for environmental issues. However, consult with MACOM real estate and environmental offices prior to telephoning HQDA offices.

\* The FOSL differs from the ROA in that while the ROA is a checklist used to negotiate the lease, the FOSL is the Army's declaration that the property is suitable to inhabit for a specific purpose. The FOSL is a document agreed upon by the Department of Defense and the U.S. Environmental Protection Agency.

\*\* If Categorical Exclusion A-21 is used and the Record of Consideration is based on the active installation's master plan NEPA analysis, then appropriate extracts from the same are to be attached to the ROA.

**SECTION A**  
**DETERMINATION OF AVAILABILITY**

Based upon the attached Report of Availability (ROA), which the MACOM has reviewed for accuracy and completeness and approved, I find that the proposed leasing action described in the ROA is in the public interest and is consistent with applicable laws and regulations.

I determine that the property is available for the proposed use and hereby authorize negotiation and execution of a lease in accordance with the attached ROA and applicable laws, regulations, and policy guidance.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Paul W. Johnson  
Deputy Assistant Secretary of the Army  
(Installations and Housing)  
OASA(I,L&E)

**SECTION B - REPORT OF AVAILABILITY**  
**GENERAL AND OPERATIONAL INFORMATION**

Installation: Stratford Army Engine Plant (SAEP)  
550 Main Street  
Stratford, CT

Terms used herein may be found in AR 405-1-12, The Real Estate Handbook, Chapter 8 (Management), dated Jan 95.

**I. LEASE ADMINISTRATION:**

1. Name, address and telephone number of Applicant or requestor's representative(s), if any:

Lessee:

State of Connecticut, Department of Economic & Community Development (ECD)  
Mr. Stephen Brown  
865 Brook Street  
Rocky Hill, CT 06067-3405  
Office: 860-258-4231  
Fax: 203-529-0535

On Behalf of Sublessee:

INDEX Corporation\*  
Project Manager: Mr. Klaus Voos  
President: Gary Sihler  
829 Bridgeport Avenue  
Shelton, CT 06484  
Office: 203-926-0323  
Fax: 203-926-0476

\*(INDEX Corporation is a wholly-owned subsidiary of INDEX Werke GmbH & Co. KG, Esslingen, Germany)

2. Proposed use:

This Report of Availability (ROA) requests approval to lease buildings 58 and 65 and approximately one acre of the adjacent North parking lot at SAEP to the State of Connecticut with authority to sublet the facilities. The State of Connecticut plans to sublease the two buildings and parking lot to INDEX Corporation. INDEX will use building 65 for assembly and fitting of machine tools to include: finish machining/aligning of basic components, castings and weldments, installation of electronic and hydraulic control systems and electrical motors, adding sheet metal covers, testing and tooling of machines including trial machining of customer's components made from various materials such as steel, aluminum, cast iron and brass. Index will use building 58 as an employee training center, a quality control center and for office space.

**3. Start date, if applicable:**

Building 65 and the one acre portion of the North parking lot will be leased upon execution of the lease. The State of Connecticut has requested the lease be obtained no later than February 1997. Building 58 will be included in the lease; however, beneficial occupancy will not occur until approximately February 1998.

**4. Recommended term of outgrant:**

  5   years; or  
       months.

The facilities are currently available for leasing upon approval and execution of the lease. Request the term of this lease be for five years or until the property is transferred. This lease will extend until the Army can convey the property. In no event, however, will leasing continue beyond the time at which the Army can convey title to the property. The lease will terminate when the property is transferred.

**II. PROPERTY INFORMATION:**

**1. General property identification. Refer to the map(s) attached to the Finding of Suitability to Lease (FOSL) showing the nearest project or installation boundary; acreage; character of land; and the number and type of improvements, if both land and improvements are included. If only building space is involved, give total square feet and describe the type of construction. Use existing maps. Identify the location of the property to be leased on the attached maps (map coordinates, etc.):**

Tract No.(s) and name, if any: N/A  
Segment maps, Master Plan designations: N/A  
Other (describe):

The property made available under this ROA includes 2 buildings totaling 48,604 square feet. Building 65 consists of 43,157 square feet and building 58 has 5,447 square feet. Additionally, approximately 1 acre of the North parking lot is being made available. A map of the installation showing the real property being made available is at Attachment 1.

**2. Acreage:**

Approximately two acres will be made available to include one acre of the North parking lot.

**3. General character of the property (short description of the uses of the property; i.e., industrial, residential, warehouse, etc.):**

SAEP is a government-owned contractor-operated (GOCO) facility located in Stratford, Connecticut on the Stratford Point peninsula in the northeast corner of Fairfield County. The U.S. Department of the Army (Army) owns the land, the buildings, and some of the production equipment. AlliedSignal currently operates SAEP under a facilities contract with TACOM. The Army-owned property at SAEP consists of approximately 126 acres, of which approximately 76 acres are improved land and 50 acres are riparian rights. The SAEP property itself is zoned light industrial, and land in the vicinity of SAEP is zoned light industrial, business, commercial, or residential. The SAEP site has been used for development, manufacture, and assembly of aircraft or aircraft engines since 1929.

**4. Are Government buildings and improvements included in the area?**

No

Yes. If yes, identify and describe all buildings, facilities and improvements, e.g. Identification Nos., square footage outgranted/percentage of building, and condition:

Building 65 - 43,157 SF, 100% of the building, excellent condition.

Building 58 - 5,447 SF, 100% of the building, good condition.

Approximately 1 acre of adjacent parking in the North Parking Lot, good condition.

**5. Existing or preceding property use (Provide a description below for each building, facility, area, etc., in either list or table format):**

Building 65 - Light manufacturing, material handling, and storage.

Building 58 - Quality testing facility and offices.

North Parking Lot - Employee parking.

**6. United States property interest:**

fee simple title

easement

in-lease

other.

**7. Is the property subject to a reversionary interest?**

No.

Yes. If yes, describe:

**8. Army interest:**

direct control

permit from a Federal Agency

withdrawn from the public domain.

**9. Type of jurisdiction:**

Exclusive Federal Jurisdiction

Concurrent Federal Jurisdiction

Proprietary status

**10. If other than proprietary, is jurisdiction to be retroceded?**

Yes

No, Explain. If a retrocession action is pending, identify the status of that effort:

Retrocession will be processed through the United States Army Corps of Engineers, New York District. Expected completion date is June, 1997.



**III. OPERATIONAL FACTORS:**

**1. Are utilities, e.g. electricity, natural gas/propane/heating oil, potable water, wastewater treatment, telephone, cable TV, etc., available from public utility companies?**

No

Yes. If yes, identify the type, quantity, and provider of such services:

Electricity - United Illuminating  
Natural Gas - United Illuminating  
Water/Sewer - City of Stratford Public Treatment Works  
Telephone - Southern New England Telephone  
Cable - Bridgeport Cable

**2. Will the Army be providing utilities or services on a reimbursable basis?**

No

Yes. If yes, identify the instrument used to establish the terms under which such services will be provided and the type, quantity, and consideration:

The lease is the instrument used to obtain reimbursement for utilities. Heat, water, & sewer will be provided on a prorata basis through the lease as estimated by the Corps of Engineers. The electricity and telephone service will be direct metered and billed by the public utility. All other services will be covered under the terms of the lease.

**3. Will the proposed use require destruction, relocation, modification, or replacement of Government facilities?**

No

Yes; please explain:

Minor modification of the interior of Building 65 will be required (some lighting, interior partitions, and electrical work). The cost for all modifications will be borne by the lessee and any sublessee with review and approval authority retained by the Army.

**4. Will the grant of the proposed use affect the operation of the installation or the BRAC Implementation Plan?**

No

Yes, please explain:

Use is consistent with normal operation of the installation and the Local Redevelopment Authorities (LRA) intended use. No adverse impacts on installation operation or BRAC Implementation are expected. The lease will help offset BRAC caretaker costs for the installation.

**5. The following site-specific recommendations are made as to limitations, restrictions, or conditions to be included in the grant to make the proposed use compatible with the operation of the installation, e.g. security, access, parking:**

a. This Lease will extend for five years or until such time as the Army can convey the property. In no event, however, will leasing continue beyond the time at which the Army is able to convey title to the property. The lease will terminate when all the property is transferred. The lessee and any sublessee will be held responsible for compliance with applicable federal, state, and local environmental and safety laws,

regulations, and monitoring procedures. The Army reserves the right to inspect and sample the leased property to determine compliance. The lessee and any sublessee must submit a request with supporting environmental documents to the Installation Manager. The Installation Manager will ensure proper routing, approval, and coordination to change the use of the property. Cost of the preparation of the environmental documents and any required restoration shall be borne by the lessee and/or sublessee. Prior to its occupancy of the leased premises, the lessee and any sublessee will be required to acknowledge and affirm the Environmental Baseline Study (EBS) prepared for the property. The EBS shall be attached to the lease as an exhibit, and made a part of the lease and any subleases by incorporation. The lessee and/or sublessee must restore the leased premises to the same or better physical and environmental condition that the property was in when the lessee and/or sublessee took possession. The lessee and any sublessee will therefore be held financially and legally responsible for any and all restoration and will be required to obtain insurance, with the U.S. Army as the beneficiary, securing this obligation, in an amount satisfactory to the Army.

b. **Environmental Compliance Plan.** The lessee or sublessee will be required to submit an Environmental Compliance Plan (ECP) indicating their method of compliance with all installation, federal, state and local laws and regulations for the use, management, generation, storage, treatment and disposal of all hazardous wastes, materials and substances. The ECP must be submitted to and approved in writing by the Installation Manager prior to occupancy of the facilities. Thereafter, the ECP shall be incorporated as an exhibit to the lease and any subleases. All facets of the lessee and sublessee operations will remain subject to inspection by the installation, other Army, federal, state and local agencies. Noncompliance with the lessee's and any sublessee's ECP could result in termination of the lease.

c. The lessee and any sublessee will be prohibited from storing or disposing non-DoD owned toxic or hazardous materials as defined under 10 U.S.C. 2692 on the leased premises unless authorized pursuant to 10 U.S.C. 2692.

d. Lessee and any sublessee shall not cause interference with the groundwater remediation efforts ongoing by the Government. The government reserves the right to enter upon the leased premises to place monitoring wells as required.

e. Lessee and any sublessee will be responsible for acquiring all required environmental permits.

f. The lease will contain the following indemnification provisions:

(1) The lessee and any sublessee and any sublessee agrees to assume all risks of loss or damage to property and injury or death to persons by reason of or incident to its possession and/or use of the Leased Premises or the activities conducted under this Lease. The lessee and any sublessee expressly waives all claims against the United States of America for any such loss, damage, personal injury or death caused by or occurring as a consequence of such possession and/or use of the Leased Premises by the lessee and any sublessee, or the conduct of activities or the performance of responsibilities under this lease by the lessee and any sublessee. The lessee and any sublessee further agrees to indemnify and hold harmless the Army, its officers, agents and employees, from and against all suits, claims, demands or actions, liabilities, judgments, costs and attorneys' fees arising out of, or in any manner predicated upon, personal injury, death or property damage resulting from, related to, caused by or arising out of the possession and/or use of the Leased Premises by the lessee and any sublessee. The Army will give the lessee and any sublessee notice of any claim against it covered by this indemnity as soon after learning of such claim as practicable.

(2) The lessee and any sublessee shall indemnify and hold harmless the United States of America from any costs, expenses, liabilities, fines, or penalties resulting from discharges, releases, emissions, spills, storage, disposal, or any other action by the lessee and any sublessee giving rise to

United States of America liability, civil or criminal, or responsibility under Federal, state or local environmental laws.

(3) Paragraphs (1) and (2) of this section and the obligations of the lessee and any sublessee hereunder shall survive the expiration or termination of the lease and any conveyance of the Leased Premises. The lessee's and any sublessee's obligation hereunder shall apply whenever the United States of America incurs costs or liabilities for the lessee and any sublessee's actions giving rise to liability under this Section.

g. The lease shall contain the following insurance provisions:

(1) At the commencement of this lease, the lessee and/or any sublessee shall obtain, from a reputable insurance company, or companies, comprehensive liability insurance. The insurance shall provide an amount not less than a combined single limit of ONE AND ONE HALF MILLION DOLLARS (\$1,500,000,000) for any number of persons or claims arising from any one incident with respect to bodily injuries or death resulting therefrom, property damage, or both, suffered or alleged to have been suffered by any person or persons resulting from the operations of the lessee and any sublessee under the terms of this lease.

(2) The liability insurance policy shall insure the hazards of the Leased Premises and operations conducted in and on the Leased Premises, independent contractors, contractual liability (covering the indemnity included in this Lease), and shall name the United States of America as an insured party. Each policy will provide that any losses shall be payable notwithstanding any act or failure to act or negligence of the Authority or the United States of America or any other person; provide that the insurer will have no right of subrogation against the United States of America; and be reasonably satisfactory to the United States of America in all respects. Under no circumstances will the lessee and any sublessee be entitled to assign to any third party rights of action that it may have against the United States of America arising out of this Lease. The lessee and any sublessee shall require that the insurance company give the Installation Manager and District Engineer, United States Army Corps of Engineers, Sacramento District thirty (30) days written notice of any cancellation or change in such insurance. The Installation Manager and District Engineer may require closure of any or all of the Leased Premises during any period for which the Authority does not have the required insurance coverage. The lessee and any sublessee shall require its insurance company to furnish to the Installation Manager and District Engineer a copy of the policy or policies, or if acceptable to the Installation Manager and District Engineer, certificates of insurance evidencing the purchase of such insurance. The minimum amount of liability insurance coverage is subject to revision by the Installation Manager and District Engineer every two (2) years or upon renewal or modification of this lease.

h. Lessee and any sublessee will be responsible for obtaining phone service from the local phone company.

i. The lessee and any sublessee will be allowed ingress and egress through SAEP security gates. The lessee and any sublessee must use installation security, badging and access control procedures.

j. Lessee and any sublessee will be responsible for security of the area describe within this ROA.

k. Fire protection to the leased property will be the responsibility of the lessor. However, the lessee and any sublessee will be required to comply with all installation, Federal, State and local fire regulations. The fire suppression sprinklers, fire detection and alarms will be maintained by the Lessor since they are integral with entire installation system and are being treated as part of the building systems. The Army will be the liaison with Stratford, state fire marshal, etc. and will do inspections.

i. Snow removal on the leased premises shall be the responsibility of the lessee and any sublessee and costs will be factored in the lease.

m. The lessor will be responsible for the costs for the maintenance and protection of common use areas of the parking lot. The service will be factored into the lease costs.

n. Lessee and any sublessee will be responsible for maintenance and repair of all leased facilities and equipment minus the real property areas maintained by the lessor under the terms of the lease. The lessee and any sublessee shall maintain all leased property to the condition in which received at the commencement of the lease, minus reasonable fair wear and tear. Preventive maintenance to the facilities will be performed in accordance with the building maintenance standards established by the government. TACOM must preauthorize any changes or modifications to the facility. All maintenance and repair work performed by the lessee and any sublessee shall comply with applicable Federal, state, and local laws and regulations. Any improvements made during the course of the lease will become the property of the government. Since Building 65 is not a stand alone structure and is attached to the main building with common walls, utilities, etc.; the exterior of Building 65 will be maintained by the Army, as well as utilities up to the point of the service connection. The lessee and any sublessee will maintain from the service connection to point of use and the interior of Building 65. The interior of Building 65 will be maintained by the lessee and any sublessee to the condition in which received at the commencement of the lease, minus reasonable fair wear and tear.

o. All utilities, with the exception of electricity, will be available and factored into the lease costs.

p. The lessee and any sublessee is prohibited from using pesticides/herbicides without the specific permission of the lessor.

q. The lessee and any sublessee must submit all sublease proposals, with any required supporting environmental and cultural resource documentation to the Installation Manager for approval prior to occupancy.

r. The lessee and any sublessee shall not conduct any subsurface excavation, digging, drilling or other disturbance of the surface.

s. All the terms and conditions in this ROA apply to any sublessee.

**6. Non-Environmental Safety Issues and Concerns, if any:**

None.

**7. Airfields and Airspace.**

a. Will the planned use of the property affect the airspace over or near the property or military installation?

No

Yes. If Yes, explain who will notify FAA and when:

b. Will the lease of the property require the notification of the FAA?

No

Yes. If Yes, explain who will notify FAA and when:

c. Will structures be built on the property which will require an airspace study?

No

Yes. If yes, explain who will do the study and any other requirements.

8. REMARKS -include any legal, policy, or mission factors you are aware of which may affect the proposed use of the property:

None. Use is consistent with BRAC regulations and LRA intended reuse.

#### IV. PRELIMINARY PROCEDURES:

1. Inventory And Condition Reports (This is a personal and real property report (videotaped) by the District when we actually have a lessee):

No Government improvements are included in the proposed outgrant, so an inventory and condition report is not required.

Government improvements are included and an inventory and condition report is required to be completed before lease.

NOTE: United States Army Corps of Engineers, New York District will prepare inventory and condition report as part of the appraisal process prior to execution of the lease.

2. Consideration:

Monetary consideration is not recommended for this action. Provide full justification.

USACE District is requested to determine full consideration.

USACE District is requested to determine fair market value for the leased interest and for offsets (in kind amounts) for the improvement, maintenance, protection, repair or restoration of the property leased. ATTACH fair market value report/appraisal and report of offsets.

NOTE: Appraisal completed by United States Army Corps of Engineers, New York District in November, 1996.

3. Waiver Of Competition:

A waiver of competition is not recommended.

A waiver of competition is recommended. Provide full justification and proposed lessee, if waiver is recommended.

Use is requested by the LRA under their intended reuse scenarios. Proposed Lessee is the State of Connecticut.

4. Other applicable laws, regulations, MOA's, etc. requiring consideration for processing this action:

Base Realignment and Closure Act of 1995.

**5. Additional information which will assist in processing this application/action:**

Property is owned by the US Army Tank-automotive and Armaments Command (TACOM), part of the Army Materiel Command (AMC). TACOM POCs for this ROA are:

Peter W. Szymanski, Installation Manager  
AMSTA-RM-XE  
USATACOM  
6501 E. 11 Mile Road  
Warren, MI 48397-5000  
Office: 810-574-8812  
Fax: 810-574-6374

MaryAnn Fournety, Real Property Specialist  
AMSTA-RM-XEM  
USATACOM  
6501 E. 11 Mile Road  
Warren, MI 48397-5000  
Office: 810-574-8787  
Fax: 810-574-6374

**SECTION C - REPORT OF AVAILABILITY**  
**ENVIRONMENTAL CONSIDERATIONS**

**1. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) REQUIREMENTS:** The requirements under NEPA for the proposed leasing action have been met as follows:

This action falls under one of the Categorical Exclusions (CX) contained in AR 200-2 (Environmental Effects of Army Actions). The environmental effect of the action has been considered. A Record of Environmental Consideration (REC) is attached, indicating the CX pursuant to which the proposed lease is authorized. The NEPA analysis on which the REC is based is:

on file at HQDA (Identify title and date:

attached (attach pertinent extracts from the applicable NEPA analysis if the REC is based on a NEPA analysis which has not been previously staffed at HQDA).

\* The impact of this action is considered to be minimal or insignificant. The Environmental Assessment (EA) with Finding of No Significant Impact (FNSI) is:

on file at HQDA (Identify title and date:

attached (if not previously staffed at HQDA).

\* The impact of this action is considered to be significant. An Environmental Impact Statement (EIS), or supplement thereto, along with the Record of Decision (ROD) is:

on file at HQDA (Identify title and date:

attached (if not previously staffed at HQDA).

\* For EA and EIS, identify mitigation actions which are required, costs, and responsible party for the mitigation: N/A

If the EIS or EA covers more than the proposed leasing action, explain how and where the leasing action is analyzed and considered in the NEPA documentation: N/A

**2. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) AND THE ENVIRONMENTAL BASELINE SURVEY (EBS):**

An EBS has been conducted and no hazardous, toxic, radiological waste (HTRW) substances were identified as released, stored, or disposed on the property in the threshold quantities. Provide date of EBS on file at HQDA:

An EBS has been conducted which indicates HTRW substances were released, stored, or disposed on the property in the threshold quantities. Hazardous storage, disposal, or release notification must be included in the outgrant document (reference 40 CFR Part 373) and attached to the FOSL. A copy of the EBS containing the details is on file at HQDA. Choose one:

Remedial actions have been completed so that the property is considered safe for the proposed use.

Remedial actions have not been completed. Estimate the time to complete such action: December, 2000. Appropriate land use restrictions and access clauses must be provided in the protection provisions in the FOSL and put into the lease.

NOTE: The provisions can be found at Enclosure 9 of the attached FOSL.

**3. REAL PROPERTY CONTAINING AMMUNITION, EXPLOSIVES, OR CHEMICAL WEAPONS.**

a. Does the property contain ammunition, explosives or chemical weapons?

No

Yes. If yes, has a Plan to clean up the property been submitted through the Major Army Command and the U.S. Army Technical Center for Explosives Safety to the Department of Defense Explosives Safety Board (DDESB) for approval before cleanup and lease?

No

Yes. If yes, have the ammunition, explosives, or chemical weapons been removed (to a degree compatible with the use of the property) prior to lease?

Yes

No. Provide date when property will be cleared:

b. Will access rights to implement any monitoring plan or use restrictions be required?

No

Yes. Describe (Set out proposed language to be inserted in lease):

**4. WASTE DISPOSAL (The Solid Waste Recovery Act, as amended; Resource Conservation and Recovery Act (RCRA)).**

a. Choose one:

The applicant will not generate hazardous waste or will not treat, dispose, or store waste defined by EPA as having the following characteristics - corrosivity, ignitability, reactivity, or toxicity.

The applicant will generate hazardous waste or will produce waste defined by EPA as having the following characteristics - corrosivity, ignitability, reactivity, or toxicity. Identify all waste streams and quantities:

See next page for list.



Expected storage quantities are:

- 10 gallons cleaning fluid
- 500 gallons hydraulic oil
- 3,000 gallons water soluble coolant
- 10 gallons touch-up paint.

Small quantities of hazardous waste will also be stored. This hazardous material meets the exception for storage as defined in 10 U.S.C. §2692. The Material Safety Data Sheets for the items listed above are included as part of the Finding of Suitability for Lease (FOSL).

Choose the appropriate:

The applicant has obtained a hazardous waste generator identification number from EPA, ID No.

The applicant has established records, waste management requirements, and a Spill Prevention Plan.

NOTE: Records, waste management requirements, and a Spill Prevention Plan are required under the terms of the lease.

b. Choose one applicable to 10 USC §2692:

The applicant will not store or dispose of non-DOD toxic or hazardous substances pursuant to 10 USC §2692.

Storage or disposal of non-DOD toxic or hazardous substances has been authorized pursuant to 10 USC §2692 (Attach copy of authorization).

#### 5. UNDERGROUND / ABOVE GROUND STORAGE TANKS.

There are no underground storage tanks (USTs) on the property and the applicant will not be installing such tanks.

There are no above ground storage tanks for fuel or other regulated substances and the applicant will not be installing such tanks.

There are underground storage tanks (USTs) on the property and/or the applicant will be installing such tanks:

a. Existing underground storage tanks are in compliance with current laws and regulations:

- Yes
- No, Explain:

b. Construction of proposed underground storage tanks has been certified for such compliance:

- Yes
- No, Explain:

There are above ground storage tanks for fuel or other regulated substances on the property and/or the applicant will be installing such tanks:

a. Existing above ground storage tanks are in compliance with current laws and regulations:

- Yes  
 No, Explain:

b. Construction of proposed above ground storage tanks have been certified for such compliance:

- Yes  
 No, Explain:

Aboveground storage tanks for the volumes shown above will be installed by the Lessee or its sublessee IAW State and Federal law after start of the lease. All installations will be reviewed and approved by the Army prior to installation.

#### 6. CLEAN WATER ACT (FEDERAL WATER POLLUTION CONTROL ACT):

This action will not involve the discharge of any pollutants into the waters of the United States or less than one million gallons of discharge per day will be made.

This action will entail the discharge of more than one million gallons of pollutants into the waters of the United States per day.

The applicant has applied for and received a National Pollution Discharge Elimination System (NPDES) Permit from the EPA/appropriate state agency. If not received, state circumstances:

The Grantee is complying with the requirements of a NPDES Permit and the Grantee has a monitoring and reporting procedure.

Subsequent requests for expansion or additional construction should be reviewed to assure the Grantee is in compliance with the five-acre rule.

#### 7. CLEAN AIR ACT - FEDERAL CONFORMITY REQUIREMENTS:

This action does not require a written conformity determination in accordance with EPA's rule because:

The installation is in an attainment area.

The installation is in a non-attainment or maintenance area and the action falls within an exemption in the rule. Attach a Record of Non-applicability (RONA) in accordance with Army Guidance. List pollutants:

This action is not exempt from the conformity regulation. Attach conformity determination. Describe the mitigation requirements or other restrictions, if any, which must be incorporated in the lease:

#### 8. ENDANGERED SPECIES:

Coordination with the USFWS to determine the possible presence of any federally listed endangered, threatened, or candidate species in the action area has occurred (attach correspondence).

See Enclosure 7a and 7b of FOSL.

**Provide date of last coordination and describe results of coordination:**

In letter dated November 27, 1996, USFWS was notified by SAEP that there are no Federal or State listed threatened or endangered plant or animal species or habitat associated with the leased property. In letter dated January 3, 1997, USFWS concurred in the agency's determination.

- This leasing action will affect:
- a federally listed endangered or threatened species; list:
  - a federal candidate species; list:
  - a state listed species; list:
  - designated critical habitat; describe:
  - none of the preceding.

This leasing action may affect a federally listed endangered, threatened, or candidate species and required consultation with the USFWS has been completed. Attach any biological assessment, opinion, and correspondence with the USFWS. Accordingly, the following restrictions must be incorporated in the lease to protect the affected species and its habitat:

**9. FISH AND WILDLIFE COORDINATION ACT (FWCA):**

This action will not jeopardize fish and wildlife species or habitat integral to Congressionally authorized mitigation or General Plans or Army agreed to recommendations in Fish and Wildlife reports prepared under the provisions of the FWCA.

This action will jeopardize fish and wildlife species or habitat integral to Congressionally authorized mitigation or General Plans or Army agreed to recommendations in Fish and Wildlife reports prepared under the provisions of the FWCA. Impact description:  
Recommended action prior to availability:

**10. COASTAL ZONE MANAGEMENT (CZM) (if applicable):**

CZM is not applicable.

CZM is applicable, and a CZM Act determination with the approved state CZM Plan has/will be obtained.

**11. FLOODPLAIN:**

This property is not located within the 100-year floodplain and does not fall under the purview of Executive Order 11988.

This property is located within the 100-year floodplain and does fall under the purview of Executive Order 11988 and (check the appropriate):

The proposed use of the property will not adversely impact the flood plain.

There is no other practicable alternative available for this intended use.

The proposed occupancy or modification may be allowed subject to the following restrictions being incorporated in the outgrant document:

**12. WETLANDS:**

Does the property to be leased contain wetlands regulated under Section 404 of the Clean Water Act (CWA)?

No

Yes. Does planned use of the property require a Section 404 permit?

No

Yes. State status of Section 404 permit process:

**13. HISTORICAL, CULTURAL, AND ARCHEOLOGICAL RESOURCES:**

The real property has been surveyed for historical and cultural resources and there have been NONE identified on this property, and this action is in compliance with the National Historic Preservation Act and other relevant laws; Executive Order 11593, Protection and Enhancement of the Cultural Environment; or any MOA's related thereto. Attach correspondence from State Historic Preservation Office agreeing that no historical and cultural resources have been identified on this property.

A survey has identified historical and/or cultural resources on this property. This action has been coordinated with the State Historic Preservation Officer and the Advisory Council on Historic Preservation in accordance with 36 CFR 800 (attach any Programmatic Agreement, MOA, and relevant correspondence). The following restrictions must be incorporated into the outgrant document to protect the property:

Native American graves have been identified on this property (Refer to requirements of the American Indian Religious Freedom Act and Native American's Graves Protection and Repatriation Act). Consultation on the disposition of Native American graves and objects has been initiated with interested Native American organizations; correspondence attached.

Archaeological sites or resources have been identified on this property. Refer to the Antiquities Act; Archaeological and Historical Preservation Act; and Archaeological Resources Protection Act. The plan for curation and disposition of these resources is attached.

**14. LEAD-BASED PAINT:**

a. Are there improvements constructed prior to 1960 which are considered to contain lead-based paint or which have been determined to contain lead-based paint?

No

Yes. Provide appropriate restrictions and notifications in the FOSL and lease.

b. Are there improvements constructed between 1960 and 1978 which are considered to contain lead-based paint or which have been determined to contain lead-based paint?

No

Yes. Provide appropriate restrictions and notifications in the FOSL and lease.

NOTE: Building 58 was built in 1967. Appropriate restrictions and notifications have been incorporated into the lease. Building 65 was built in 1992 and has no restrictions.

**15. OTHER ENVIRONMENTAL CONSIDERATIONS:**

**a. Is there any Asbestos Containing Material on the property?**

No

Yes. Provide appropriate restrictions and notifications in the FOSL and lease.

NOTE: Building 58 has asbestos containing material (ACM) and appropriate restrictions have been incorporated into the lease. Building 65 has no ACM and does not need any ACM related restrictions.

**b. Will the proposed outgrant activity impact an area designated under the Wild and Scenic Rivers Act?**

No

Yes. If yes, what conditions may need to be included in the lease?

**c. Will the proposed outgrant activity involve the use of insecticide, fungicide, and rodenticide so that compliance with the Federal Insecticide, Fungicide, and Rodenticide Act is necessary, e.g. Agricultural, golf courses, restaurants?**

No NOTE: Any FIFRA actions will be done by the Lessor.

Yes. If yes, list:

**d. Are there polychlorinated biphenyls (PCBs) present?**

No

Yes

**e. Has a radon survey been completed for the buildings to be leased?**

No

Yes. Choose one:

no buildings have radon in excess of applicable standards.

the following buildings exceed standards: List with appropriate use restrictions:

**f. Are there any other special-purpose environmental laws applicable to the proposed activity?**

No.

Yes, Explain:

**g. Is further environmental study required?**

No

Yes, Explain:

**16. ADDITIONAL COMMENTS:**

None.

**MACOM Certification**

The information furnished in Sections B and C has been fully coordinated among the MACOM Staff (BRAC, environmental, legal, and real estate) and is accurate and complete. Recommend that the DASA (I&H) make a Determination of Availability by signing Section A of the ROA.

\_\_\_\_\_  
Date

\_\_\_\_\_  
MACOM Certification Authority

- Attachment:**    **Finding of Suitability to Lease (FOSL) with following enclosures:**
- Encl 1.    Site Map of Stratford Army Engine Plant
  - Encl 2.    CTDEP Concurrence in EBS
  - Encl 3.    Record of Environmental Consideration
  - Encl 4.    Notification of Hazardous Substance Releases and Spills Chart
  - Encl 5.    Environmental Baseline Survey Report Summary
  - Encl 5a.    SAEP CERFA Parcelization Map
  - Encl 5b.    Notification of Hazardous Substance Releases and Spills Chart
  - Encl 6.    Cultural Resources Memorandum of Agreement
  - Encl 7a.    SAEP Notification Letter to USFWS
  - Encl 7b.    USFWS Response Letter to SAEP
  - Encl 8.    Radiation Survey Results (PROVIDED SEPARATELY)
  - Encl 9.    Lease Environmental Protection Provisions
  - Encl 10a.    SAEP Request to USEPA, Region I and CTDEPre: FOSL
  - Encl 10b.    USEPA, Region I and CTDEP Comments to FOSL (PROVIDED SEPARATELY)

ATTACHMENT B

SAEP FINDING OF SUITABILITY TO LEASE (FOSL)

FINDING OF SUITABILITY  
TO LEASE (FOSL)

BUILDINGS 65 AND 58 AND  
PORTION OF NORTH PARKING LOT  
STRATFORD ARMY ENGINE PLANT (SAEP)  
STRATFORD, CONNECTICUT

MARCH 1997

DIRECTORATE FOR INSTALLATIONS AND SERVICES  
SAEP INSTALLATION MANAGEMENT DIVISION (AMSTA-RM-XS)  
U.S. ARMY TANK-AUTOMOTIVE AND ARMAMENTS COMMAND  
WARREN, MI 48397-5000



## FINDING OF SUITABILITY TO LEASE (FOSL)

### STRATFORD ARMY ENGINE PLANT (SAEP) BUILDINGS 65 AND 58 AND PORTION OF NORTH PARKING LOT STRATFORD, CONNECTICUT

In my capacity as Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health, I have determined that Buildings 65 and 58 and a one acre portion of the North parking lot are suitable for lease to the State of Connecticut with a sublease to Index Corporation, Shelton, Connecticut. This FOSL has been coordinated with the U.S. Environmental Protection Agency (USEPA), Region I and the Connecticut Department of Environmental Protection (CTDEP).

#### DESCRIPTION OF PROPERTY

The parcel to be offered for lease includes Building 65, Building 58, and approximately one acre of the North asphalt covered parking lot. A site map showing the general location of the property being made available for lease is provided at Enclosure 1.

#### ENVIRONMENTAL CONDITION OF PROPERTY

A determination of the environmental condition of the facilities has been made in the form of a Community Environmental Response Facilitation Act (CERFA) evaluation<sup>1</sup> and Environmental Baseline Survey (EBS) Report<sup>2</sup>, hereinafter referred to as "EBS.". Although the EBS has not been finalized, the State of Connecticut has concurred in the findings of the EBS. See Enclosure 2.

#### NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with leasing the subject facilities have been adequately analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis have been documented in a Record of

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<sup>1</sup>ABB Environmental Services, Inc., Draft Final Environmental Baseline Survey Report for Stratford Army Engine Plant, CERFA Letter Report, Section 5, July 1996.

<sup>2</sup>ABB Environmental Services, Inc., Draft Final Environmental Baseline Survey Report for Stratford Army Engine Plant, July 1996.

Environmental Consideration (REC)<sup>3</sup> which found that the leasing action will have no significant impact on the environment and qualifies for Categorical Exclusion A-24, Army Regulation (AR) 200-2, Environmental Effects of Army Actions, Appendix A, List of Categorical Exclusions. See Enclosure 3.

**NOTIFICATION OF HAZARDOUS SUBSTANCE STORAGE, RELEASE, OR DISPOSAL ON PROPERTY**

The property addressed by this FOSL is considered to be Department of Defense (DoD) Environmental Condition of Property (ECP) Category 7 (i.e., areas that are not evaluated or require additional evaluation). Buildings 65 and 58 are considered to be Category 7 because CTDEP's remediation standards were exceeded due to unknown underground contamination and the site-specific risk assessment has not been finalized. The one acre portion of the North parking lot is also considered to be Category 7 since a site-specific assessment has not been finalized.

DoD FOSL Guidance requires notification of hazardous substance storage, release, or disposal on the property in the lease documents. In the instant case, notification of hazardous substance storage, release or disposal on the subject property shall be provided as required in the lease document. See Table at Enclosure 4 and the Environmental Baseline Survey Report Summary, hereinafter referred to as "EBS Summary" at Enclosure 5.

The complete search of agency files revealed the types, quantity of, and time period hazardous substances were stored, released, or disposed of at SAEP Building 65 and Building 58, and the one acre portion of the North parking lot. The complete search of agency files did not reveal any storage of hazardous substances for one year or more exceeding the notification quantities of 40 CFR 373. In addition, the complete search did not reveal any release or disposal of hazardous substances within Buildings 65 or 58, or the one acre portion of the North parking lot. However, the search did reveal that there is possible soil and/or ground water contamination beneath Buildings 65 and 58; but, there is no likelihood of subsurface contamination migrating into the buildings due to the concrete flooring in each building. Therefore, there is no pathway for transmission of subsurface contamination to the surface that could cause a risk of exposure to the lessee/sublessee.

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<sup>3</sup>Record of Environmental Consideration (REC) for Stratford Army Engine Plant, December 1996.

## SUMMARY OF EBS FINDINGS

Hazardous substance storage, release, or disposal for Buildings 65 and 58 and the one acre portion of the North parking lot is outlined below and in detail in the attached EBS Summary, Enclosure 5.

### Building 65:

Building 65 (B-65) was built in 1991 and used until the present as a storage facility by AlliedSignal Engines and its predecessor corporate organizations. Building 65 was not used at any time for hazardous substance storage.

Based on a review of the Base-Wide EBS and a Visual Site Inspection (VSI) of the parcel, B-65 is considered DoD ECP Category (7) because of its location over possible contaminated ground water. The EBS states, "Evidence of former paint disposal activities was found during construction of the foundation for B-65 in 1990." EBS, p. 4-4. The EBS further states these zinc-chromate contaminated soils were removed to the low tide level and properly disposed off site. EBS, p. 4-4.

In addition, petroleum contaminated subsurface soils were found during the construction of B-65. These petroleum contaminated soils were excavated and reused on site in accordance with CTDEP requirements. EBS, p. 4-5. The EBS investigation identified no other known or potential hazards associated with B-65 such as asbestos, lead paint, radon, etc.

### Building 58:

Building 58 (B-58) was built in 1967 and has been idle since approximately May 1996. Prior to that date, Building 58 was used as a Standards Laboratory by AlliedSignal Engines and its predecessor corporate organizations.

B-58 is also considered DoD ECP Category 7 due to its location over possibly contaminated ground water. The EBS states that the Phase I Remedial Investigation results for B-58 indicate subsurface soil contamination by Polyaromatic Hydrocarbons (PAHs), halogenated solvents, and Polychlorinated Biphenyls (PCBs). Groundwater test results indicate contamination by halogenated solvents, fuel-related volatile organic compounds (VOCs), and metals. Contaminant concentrations in groundwater exceed CTDEP remediation standards based on surface water protection criteria. During pile driving operations for the construction of B-58, oil reportedly gushed from the ground around the piles (W-C, 1991). EBS, p. 4-6.

In addition, the EBS states that Site 27 (Area of Concern (AOC) No. 27) is located within Parcel 6 and is described as B-58 and associated hazardous waste satellite accumulation areas. The storage of jet fuel and 1,1,1-trichloroethane (TCA) at and around B-58 have been identified as Sites 27a and 27b (Table 4-1 of the EBS); however, no spills or releases have been reported. The EBS investigation identified no other known hazards in the parcel; however, there is the potential for lead paint and asbestos containing materials (ACMs) to exist in B-58.

#### **North Parking Lot:**

Approximately one acre of the North parking lot will be part of the proposed lease. The parking lot has an asphalt cap. This portion of the North parking lot is also considered to be DoD ECP Category 7 due to the possibility of contaminated ground water beneath the parking lot. There are no buildings in this portion of the North parking lot; therefore, no potential hazards such as asbestos, lead paint, radon, etc. See EBS, p. 4-3. No disposal history is available for this area. Groundwater contamination by halogenated solvents in an adjacent parcel to the parking lot (CERFA Parcel 3) indicates the potential for contamination beneath the North parking lot.

#### **Asbestos and Lead Based Paint:**

Asbestos has been found to be contained in Building 58; however, it is in a non-friable condition and does not pose a threat or risk to human health and the environment. Lead based paint is presumed to be present in Building 58; however, it does not pose a threat or risk to human health and/or the environment.

#### **Cultural/Historic Resources:**

A Memorandum of Agreement (MOA) concerning cultural resources has been signed by the State of Connecticut and the Advisory Council on Historic Preservation. The MOA was signed by the Advisory Council on Historic Preservation October 21, 1996. See Enclosure 6. Buildings 65 and 58 are not historically significant and are not subject to any provisions in the MOA.

#### **Endangered Species:**

There are no Federal or State listed threatened or endangered plant or animal species or habitat associated with these buildings. Notification of this determination was provided to the U.S. Fish and Wildlife Service (USFWS) by letter dated November 27, 1996. See Enclosure 7a. On January 3, 1997, the USFWS concurred in the agency's determination. See Enclosure 7b.

### **Polychlorinated Biphenyls (PCBs):**

The lessee/sublessee will be advised, via the Environmental Condition Report (ECR) and in the lease, that utilities on the leased property do not contain Polychlorinated Biphenyls (PCBs). However, it must be noted that the subsurface soil samples indicate possible PCB contamination underneath Building 58; but, this does not pose a threat or risk to human health and the environment.

### **Radiological Surveys:**

Radiological surveys have been conducted on Buildings 65 and 58 by the U.S. Army Center for Health Promotion and Preventive Medicine (CHPPM). Surveys were required under BRAC and as part of the decommissioning of the Nuclear Regulatory Commission (NRC) license held by AlliedSignal Engines. Survey results indicated there were no indications of any residual or unaccounted radioactivity in either Building 65 or 58. See Enclosure 8.

Although there were no indications of radioactivity in Buildings 65 and 58; during the period from approximately 1965 through 1993, an area of approximately 100 square feet adjacent to Building 58 (within approximately 50 to 60 feet) was intermittently used as a staging area for material containing thorium and/or uranium. These materials were scheduled to be disposed and were removed and properly disposed during the aforementioned period. The former staging area has been fenced to prohibit entry, warning signs have been posted, and further radiation surveys and/or decontamination for this area will be conducted. Access to this area has been restricted to authorized Government and/or AlliedSignal Engines personnel only. This area will not interfere with the proposed leasing action in Buildings 65 and/or 58, or the one acre portion of the North parking lot.

### **LEASE ENVIRONMENTAL PROTECTION PROVISIONS**

On the basis of the results from the CERFA study, the EBS, and subsequent investigations, certain terms, conditions, reservations, restrictions, and notifications are required for the subject lease. The environmental protection provisions in Enclosure 9 shall be included in the lease agreement. The property can be leased in its present condition without unacceptable risk to human health and the environment, and without interference with the on-going SAEP environmental restoration program. Notification of hazardous substance storage, release, or disposal on the property shall be provided in the lease documents as required under DoD FOSL Guidance.

## REGULATORY COORDINATION

The FOSL has been coordinated with the State of Connecticut Department of Environmental Protection and the U.S. Environmental Protection Agency, Region I. See Enclosure 10a. All comments from these agencies have been addressed. Copies of their letters commenting on the FOSL are attached at Enclosure 10b. There are no outstanding unresolved issues.

## CONCLUSION

Based on the above information and referenced environmental documents, I conclude that the DoD requirements to reach a FOSL have been met.

Raymond J. Fatz  
Deputy Assistant Secretary of the Army  
(Environment, Safety, and Occupational Health)  
OASA (I,L&E)

14 Enclosures

## LIST OF ENCLOSURES

- 1 Site Map of Stratford Army Engine Plant
- 2 CTDEP Concurrence in EBS
- 3 Record of Environmental Consideration
- 4 Notification of Hazardous Substance  
Releases and Spills Chart
- 5 Environmental Baseline Survey Report Summary,  
referred to as "EBS Summary"
- 5a SAEP CERFA Parcelization Map
- 5b Notification of Hazardous Substance  
Releases and Spills Chart
- 6 Cultural Resources Memorandum of Agreement
- 7a SAEP Notification Letter to USFWS
- 7b USFWS Concurrence Letter to SAEP Notification
- 8 CHPPM Radiation Survey Results
- 9 Lease Environmental Protection Provisions
- 10a SAEP Request for Comments re: FOSL to  
USEPA, Region I and CTDEP
- 10b USEPA, Region I and CTDEP Comments to FOSL

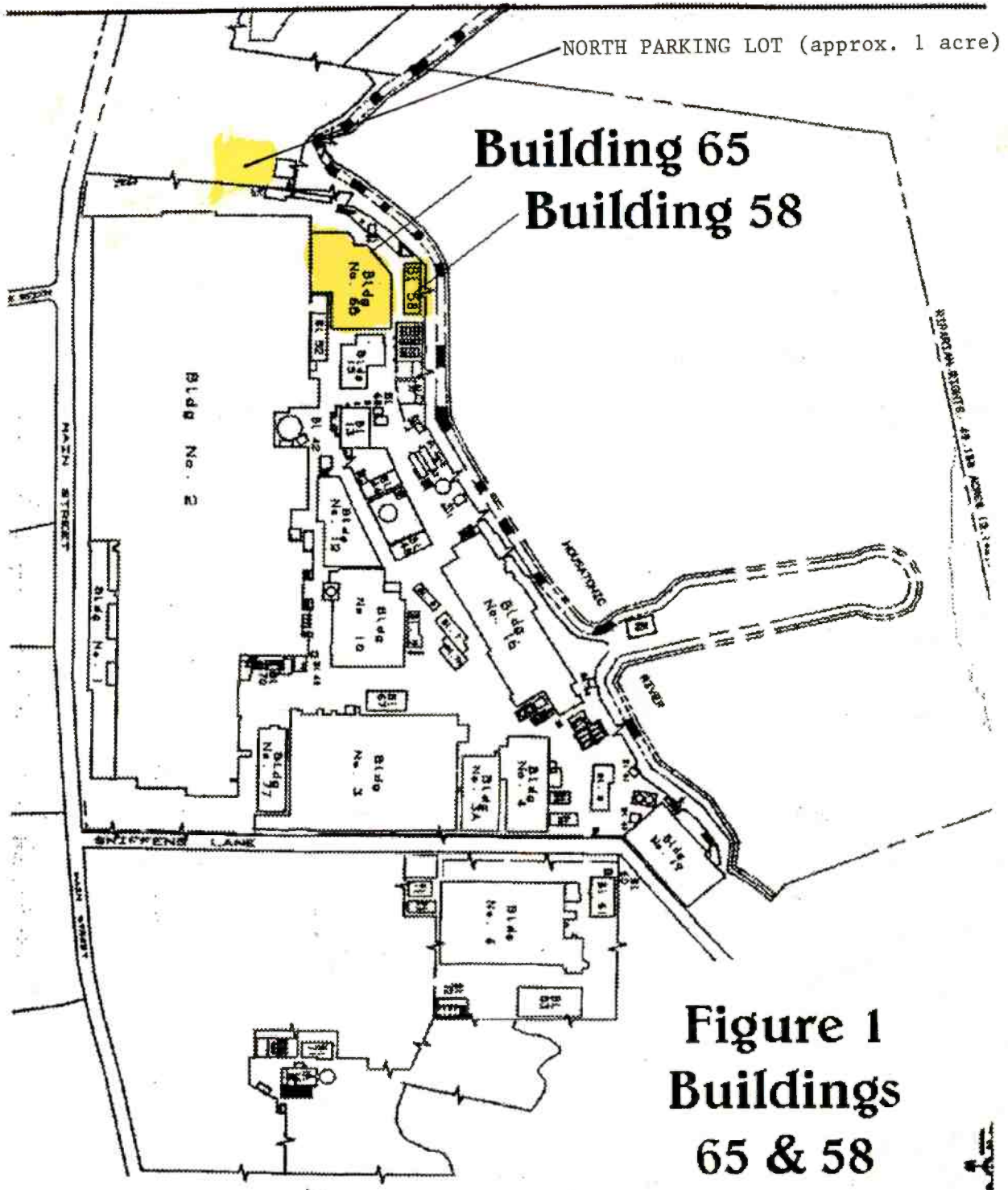
ENCLOSURE 1

SITE MAP OF SAEP



**PROPERTY DESCRIPTION:**

The property shown on the site map (Figure 1) is Army-owned land at SAEP consisting of 115 acres, of which approxm. 76 acres are improved land and 39 acres are riparian rights.



ENCLOSURE 2

CTDEP CONCURRENCE IN DRAFT FINAL EBS



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WATER MANAGEMENT  
Permitting, Enforcement & Remediation Division



November 18, 1996

Mr. Gien S. Boldt  
USAEC  
Attn: SFIM-AEC-BCB  
Aberdeen P. G., MD 21010-5401

RE: SAEP EBS

Dear Mr. Boldt:

Staff of the Permitting, Enforcement and Remediation Division (PERD) have reviewed the document entitled "Stratford Army Engine Plant, Stratford, Connecticut, Environmental Baseline Survey, Draft Final Environmental Baseline Survey Report" dated July 1996 which was prepared for the United States Army Environmental Center by ABB Environmental Services.

The Department concurs with the EBS report and, based on the data contained within the EBS, concurs with the CERFA letter report incorporated as Chapter 5.

Nothing in this determination shall affect the authority of the Commissioner under any other statute or regulation, including, but not limited to, any authority to institute any proceeding, or take any other action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law. If at any time the Commissioner determines that the actions at the parcel have not fully characterized the extent and degree of pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding, or take any action to require further investigation or further action to prevent or abate pollution.

In addition, nothing in this determination shall relieve any person of his or her obligations under applicable federal, state and local law.

Please direct all future correspondence and any questions pertaining to this matter to Kenneth Feathers of my staff at 860/424-3770.

Sincerely,

Michael J Harder  
Director

MJH:KRF.krf

cc

- Mr. Tom Yourk, BEC, SAEP, Allied Signal, 550 Main Street, Stratford, CT 06497
- Mr. Nelson Walker, ABB Environmental Service, Inc., P O. Box 7050, Portland, ME 04112-7050
- Mr. Peter Szymanski, USA TACOM, Attn: AMSTA-RM-XEM, Bldg. 230, 6501 East Eleven Mile Road, Warren MI 48397-5000
- Mr. Vincenzo Crifasi, USA COE, Attention CENEN, 26 Federal Plaza, New York, NY 10278-0090
- Mr. Fredenc D. Hyatt, Base Transition Coordinator, Stratford Army Engine Plant, 550 South Main St. Stratford, CT 06497
- Mr. Rick Leighton, EPA

<SAEP6NLWPD><November 15, 1996>

ENCLOSURE 3

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

## RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

### MEMORANDUM FOR RECORD

**PROJECT TITLE:** Interim Lease of Buildings 65 and 58 and one acre portion of North parking lot at Stratford Army Engine Plant (SAEP), Stratford, CT

**BRIEF DESCRIPTION:** In October 1995, SAEP was placed on the Base Realignment and Closure (BRAC) list. In order to advance the reuse of SAEP, Buildings 65 and 58, and one acre of the north parking lot will be leased to the State of Connecticut with a sublease to Index Corporation of Shelton, CT. Buildings 65 and 58 will be used by Index Corporation for office space, materials storage, minor machine tooling, machine assembling, and training. The property has been screened as excess property in accordance with BRAC screening criteria.

All activities to be conducted by the lessee/sublessee are consistent with prior land uses and will be restricted to activities similar in nature to those performed when the facilities were in active use by the Department of the Army. The lessee/sublessee will not be permitted to store, dispose, or treat any hazardous materials unless specifically authorized in accordance with the provisions of 10 U.S.C. § 2692. The activities of the lessee/sublessee will not produce any releases of hazardous materials to the environment.

**ANTICIPATED DATE AND/OR DURATION OF PROPOSED ACTION:** The proposed lease is expected to take effect in March 1997 for five (5) years.


**REASON FOR USING RECORD OF ENVIRONMENTAL CONSIDERATION:** The proposed action is categorically excluded under the provisions of CX A-24, AR 200-2, appendix A, (and no extraordinary circumstances exist as defined in paragraph 4-3), because:

1. The facilities and associated areas will be leased to the State of Connecticut for use and further subleasing for activities similar to those previously conducted by the Army, without significant change in land use.

2. The Draft Final Environmental Baseline Survey Report (EBS) has determined that there are no Federal or State endangered or threatened species or critical habitat present at SAEP. The lessee's/sublessee's actions will, therefore, not have any effect on any endangered or threatened species or critical habitat. A letter indicating this lack of impact and effect has been forwarded to the U.S. Fish and Wildlife Service. See Attachment 7 of Finding of Suitability to Lease (FOSL).

3. Buildings 65 and 58 have been determined to have no historical value in accordance with the National Historic Preservation Act. The Connecticut State Historic Preservation Officer's determination is found in the Memorandum of Agreement (MOA) at Attachment 6 of the FOSL.

13 Jan 97  
DATE

  
PETER W. SZYMANSKI  
Installation Manager  
Stratford Army Engine Plant

CF:  
James K. Park  
William R. Schultz  
Terry Tighe  
Violet Kristoff

ENCLOSURE 4

NOTIFICATION OF HAZARDOUS SUBSTANCE  
RELEASES AND SPILLS CHART

**TABLE 1.  
EBS DATA FROM TABLE 4-1  
AND  
WORKSHEET A &B:**

Site Number	CERFA Parcel No.	Storage Site or Area	Substances Stored	Largest Quantity Stored	Length of Time of Storage	Is Notification of Storage Required Under CERCLA Section 120 (h)		Has a Release Occurred	
						Yes	No	Yes	No
27 a	6	Building B-58	Jet Fuel (Satelite Accumulation Area)	55 gallons	Pre 1991 to 1996	X		X see note 1	
27 b	6	Building B-58	1,1,1-TCA	>300 gallons	Pre 1991 to 1996	X			X
21 a	4	Building 65						X see note 2	
21 b	4	Building 65						X see note 3	

**Notes**

1. Oil was reportedly observed in the ground during pile driving for the construction of Building 58
2. Paint-contaminated soils (believed to be from zinc-chromate undercoating for Corsairs in the 1940s) were discovered and excavated to the low tide water level during the construction of Building B-65.
3. Petroleum -contaminated soils were also discovered during the B-65 excavation. At least some of this soil (with avg. Concs. < 300 mg/kg) has been moved to the south parking lot and used as sub grade fill beneath the asphalt. Excavated soil was likely industrial fill and debris, including battery cases.



ENCLOSURE 5

ENVIRONMENTAL BASELINE SURVEY REPORT SUMMARY  
(EBS SUMMARY)

**ENVIRONMENTAL BASELINE SURVEY REPORT SUMMARY  
STRATFORD ARMY ENGINE PLANT (SAEP)  
Building 65, Building 58, and  
Portion of North Parking Lot**

**INTRODUCTION AND BACKGROUND**

The Stratford Army Engine Plant (SAEP) is a government-owned, contractor-operated (GOCO) facility located in Stratford, Connecticut. The U.S. Department of the Army (Army) owns the land, the buildings, and some of the production equipment. Responsibility for the jurisdiction, control, and accountability of SAEP was transferred from the U.S. Army Aviation and Troop Command (ATCOM) to the U.S. Army Tank-automotive and Armaments Command (TACOM) on September 9, 1995. AlliedSignal Engines currently operates SAEP under a facilities contract with TACOM. Prior to October 28, 1994, Textron Lycoming operated the facility.

In October 1995, SAEP was placed on the Base Realignment and Closure (BRAC) list, known as BRAC 95. Pursuant to the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510), the BRAC Environmental Restoration Program dictates that environmental contamination on Army BRAC properties be investigated and remediated, as necessary, prior to disposal and reuse. For BRAC 95, the Environmental Restoration Program begins by conducting an Environmental Baseline Survey (EBS), which describes the environmental condition of the property. This is used to determine the suitability to lease or transfer excess BRAC property.

A base-wide environmental survey (EBS) was prepared by ABB Environmental Services, Inc. (ABB-ES) in July 1996 entitled "Draft Final Environmental Baseline Survey Report for Stratford Army Engine Plant." The State of Connecticut has concurred in the findings of the Draft Final EBS. See Enclosure 2 of the Finding of Suitability to Lease (FOSL).

The activities that were completed by ABB-ES for the EBS included the following:

1. Review of SAEP records, including reports, engineering drawings, and historical photographs;
2. Discussions with SAEP personnel who are familiar with current and past site activities;
3. Visual reconnaissance of the site and areas immediately adjacent to the site;

4. Collection of information pertaining to the site or adjacent areas from public organizations;

5. Review of the Phase I Remedial Investigation Report and Draft Phase II Remedial Investigation Report, including a review of baseline risk assessment, human health risk assessment, and ecological risk assessment.

## **SITE DESCRIPTION AND PRODUCTION HISTORY**

SAEP is located in Stratford, Connecticut, on the Stratford Point peninsula in the Southeast corner of Fairfield County. See Site Map at Enclosure 1 of FOSL. The Army-owned property at SAEP consists of approximately 115 acres, of which approximately 76 acres are improved land and 39 acres are riparian rights. The riparian rights property consists of the intertidal flats of the Housatonic River of which an estimated 2 acres of this property comprise a causeway constructed in the 1930's to provide access to the river channel. The 76 acres of improved land include an estimated 10 acres along the Housatonic River where fill was placed over tidal flats during the early development of SAEP.

The plant is bounded on the north by a paved parking lot and wetlands; the Housatonic River to the east; a parking lot, an open field, a drainage channel, and small commercial businesses to the south; and, hangar buildings, the Sikorsky Memorial Airport, several small businesses, to the southeast; and Frash Pond to the northwest.

Historically, land in the SAEP vicinity was used for agricultural and residential purposes. At present, local agricultural activities are minimal. The primary agricultural (aquaculture) activity in the area involves growing oysters in shallow waters of the Housatonic River.

The SAEP property itself is zoned light industrial, and land in the vicinity of SAEP is zoned light industrial, business, commercial, or residential. The SAEP site has been used for development, manufacture, and assembly of aircraft or engines since 1929, and the plant history has been categorized into the following periods:

1. 1929 to 1939. Sikorsky Aero Engineering Corporation developed and manufactured sea planes at the Stratford plant.

2. 1939 to 1948. Chance Vought Aircraft located its operations at the Stratford plant in 1939, and the company became known as Vought-Sikorsky Aircraft Division. Sikorsky developed the helicopter and left the plant in 1943 because of overcrowding.

Chance Vought developed the "Corsair" for the U.S. Navy, and mass produced Corsairs during World War II. Chance Vought vacated the Stratford plant in 1948.

3. 1948 to 1951. The Stratford plant was idle.

4. 1951 to 1976. The U.S. Air Force procured the Stratford plant in 1951 and named it Air Force Plant No. 43. The AVCO Corporation (AVCO) was contracted by the Air Force to operate the plant. AVCO manufactured radial engines for aircraft in the 1950s, and developed and manufactured turbine engines, primarily for aircraft, in the 1960s and 1970s.

5. 1976 to Present. The plant was transferred from the U.S. Air Force to the Army in 1976; at that time, the plant was renamed the Stratford Army Engine Plant, although it continued under AVCO operations. AVCO was contracted by the Army to develop the AGT-1500 engine to power the Abrams tank. AVCO also developed and manufactured marine and industrial engines. AVCO merged with Textron in December 1985, and subsequently formed the Textron Lycoming Stratford Division. The contract for operation of SAEP was transferred from Textron Lycoming to AlliedSignal, Inc. in 1994. Currently, turbine engines for both military and commercial aircraft and land vehicles continue to be developed, manufactured, and tested at SAEP by AlliedSignal Engines.

The primary types of industrial waste generated at SAEP prior to the 1950s are reported to have been waste oils, fuels, solvents, and paints (W-C, 1991). Since 1951, most of the wastes generated at SAEP have resulted from engine production operations such as plating, metal working, and finishing, as well as cleaning operations. Wastes are also generated as a result of engine and engine component testing, research and development, raw materials testing, vehicle and other maintenance, and on-site waste treatment.

## **ENVIRONMENTAL SETTING**

A review of environmental setting information for the SAEP site and vicinity identified the following:

1. The land at SAEP is almost entirely less than 10 feet above mean sea level, with the exception of a dike along the Housatonic River constructed for flood protection. SAEP is within the 100-year floodplain, and the site was flooded by the Housatonic River in 1951 and 1968, with limited flooding in 1993 (low spots near storm drains).

2. Surface water bodies in the site vicinity include: Long Island Sound, the Housatonic River, Frash Pond, and the Marine Basin and drainage channel. Long Island Sound receives all of the Stratford region's drainage, in large part via the Housatonic River.

3. Most of the SAEP surface is paved or covered with buildings, such that there is little infiltration, resulting in significant surface runoff during storm events. Most of the precipitation is drained to the Housatonic River. Storm drainage is generally pumped through the oil abatement treatment plant, except in times of heavy precipitation when some runoff is pumped directly to the Housatonic River.

4. The Bridgeport Hydraulic Company supplies the cities of Bridgeport and Stratford with potable water from the Trap Falls Reservoir in Shelton, Connecticut, about 6.5 miles north-northwest (up gradient) of SAEP. In 1989, the Trap Falls Reservoir supplied drinking water to 99.9 percent of the populations of Bridgeport and Stratford, including residents in the immediate area of SAEP.

5. Bedrock at the site reportedly ranges from about 100 to 150 feet below the land surface. The site's shallow geology is characterized by five distinct units: sand, gravel and construction fill material; highly organic silt and peat (tidal inlet or marsh deposits); silt and sandy silt alluvium associated with the peat; estuarine silt; and stratified drift consisting of outwash sand with some gravel and ice-contact sand, gravel, and cobble deposits.

6. Stratified drift deposits (sand and sand/gravel) form the upper aquifer at the SAEP, which may be up to 150 feet thick. This aquifer contains fresh water, but no information was found to indicate the presence of a salt water wedge typical of coastal environments. Water wells for drinking supply or other domestic uses are reportedly not present in the SAEP vicinity.

7. Freshwater wetlands, intertidal flats, and tidal marshes occur both in the vicinity of SAEP and on site. Freshwater wetlands in the vicinity are associated with Frash Pond, Salby Pond, and a small acreage of land abutting the SAEP property to the north. Intertidal flats in the vicinity are located in a band along the shoreline of the Housatonic River and Long Island Sound. SAEP's riparian rights encompass an estimated 51 acres of intertidal flats. Large tidal marshes occur in the site vicinity, including the Great Meadow Salt Marsh, areas along the Housatonic River, Nells Island, and land around Sikorsky Airport.

8. No federally-listed threatened or endangered mammalian, amphibian, invertebrate, aquatic, or plant species have been reported to occur in the vicinity of

SAEP. Two federally-listed (the piping plover and roseate tern) and 11 state-listed threatened, endangered, or special concern birds have the potential to occur in the vicinity of SAEP. The intertidal flats area of SAEP may be feeding areas for the plover and tern.

9. Two prehistoric archeological sites are reportedly located on SAEP property, as well as an Indian burial site.

10. Short Beach Park is located 1 mile south of SAEP, and there are three marinas within 2 miles of SAEP.

## **COMMUNITY ENVIRONMENTAL RESPONSE FACILITATION ACT (CERFA) ASSESSMENT**

As part of the EBS prepared by ABB-ES, ABB-ES conducted a Community Environmental Response Facilitation Act (CERFA) investigation at SAEP. CERFA requires the Federal government, before termination of federal activities on real property owned by the government, to identify property on which no hazardous substances or any petroleum products, or their derivatives, were stored, released, or disposed. ABB-ES prepared a map of the CERFA parcelization at SAEP and is enclosed as Enclosure 5a of this summary. The map also provides definitions of each DoD Environmental Condition of Property (ECP) Category.

The SAEP property was divided by ABB-ES into 33 parcels based on geographic setting, historical manufacturing processes or operations, and storage or release of hazardous materials or petroleum products. No CERFA parcels or CERFA parcels with qualifiers were identified as a result of the CERFA assessment by ABB-ES. All 33 parcels were determined to be CERFA disqualified.

Of the 33 parcels, two parcels (CERFA Parcel 12 (Building 2 plating area, Building 3 former plating area, Building 63, Building 70, and Building 77) and CERFA Parcel 32 (near shore intertidal flats)) were categorized as Category 6 (identified as red on the attached map) based on the results of the preliminary draft risk assessment and on discussions with TACOM about the probable need for remediation for the plating area in Building 2. A DoD ECP Category of 6 means these areas need remediation, but response action has not yet been implemented.

One parcel (Parcel 21, the former sludge lagoons) was identified as Category 5 (where an area needs remediation, but only a portion of the required remedial actions have been taken) (colored yellow) based on the ongoing monitoring program. Parcel 22, where petroleum-contaminated soil was treated and then used as fill material, was identified as Category 4 (colored dark green) indicating that remediation was completed.

One parcel (Parcel 2, the intertidal flats) was classified as Category 3 (light green) as not needing remediation.

The remaining 28 parcels were classified as Category 7 (Gray), including Buildings 65 and 58, and the one acre portion of the North parking lot. Areas designated as Category 7 are areas which have not been evaluated and/or need additional investigation. Some of these parcels need additional environmental sampling to evaluate source areas or assess the distribution of contaminants. Others were classified as Category 7 because there were exceedances of the Connecticut Department of Environmental Protection (CTDEP) remediation standards and the site-specific risk assessment has not been finalized. This risk assessment may show no cleanup is needed in a parcel even though remediation standards are exceeded.

#### **Building 65:**

Building 65 (B-65) is located in the Northeast portion of the facility. It is currently used for material storage, with a total area of 43,157 square feet. The Mezzanine area is 945 square feet. B-65 is included in Parcel 4 which is listed as CERFA Category 7. The reason for this listing is because of possible ground water contamination below the building. See attached CERFA Parcelization Map, Enclosure 5a.

The EBS states, "... During the construction of building B-65, soils were encountered contaminated with chromium and petroleum. Concentrations were higher on the northeastern side of the building. These contaminated soils were removed as needed to complete the B-65 construction; however, additional contaminated soils may remain at the site." EBS, Executive Summary, p. 10. It also states, "Evidence of former paint disposal activities was found during construction of the foundation for B-65 in 1990. The source of the paint contamination is believed to have been zinc-chromate undercoat used to paint the Corsair aircraft in the 1940s. Zinc-chromate contaminated soils were removed to the low-tide level and properly disposed off site." EBS, p. 4-4.

The EBS further states that petroleum contaminated subsurface soils also found during the construction of B-65 were excavated and reused on site (Parcel 22) in accordance with CTDEP requirements. Post-remediation sampling data was not identified during the EBS investigation. Phase I Remedial Investigation data from adjacent Parcels 3, 5, 6, and 9 indicate groundwater contamination. See EBS, pp. 4-4 and 4-5.

Finally, the EBS states that site number 21 (Area of Concern (AOC) No. 21) is within Parcel 4. The site is identified as the Building B-65 area (former location of

Buildings 52 and 55). Sites 21a and 21b (paint-contaminated soils and petroleum-contaminated soils) describe locations where a release or disposal has occurred. These are identified in the EBS Table 4-1 as well as EBS Worksheet B (in Appendix C) of the EBS report. See EBS, p. 4-5. The table has been summarized and has been attached to this summary at Enclosure 5b. The EBS investigation identified no other known or potential hazards associated within Parcel 4, Building 65 (i.e., asbestos, lead paint, radon, etc.).

### **Building 58**

Building 58 (B-58) is also located in the northeastern portion of the site. It has been idle since approximately May 1996 and was known as a Quality and Testing Facility. It was constructed in 1967. It consists of one story with an area of 5,447 square feet. It is included in parcel 6 and is also listed as CERFA Category 7 due to the possibility of contaminated ground water beneath the building.

The EBS states that the Phase I Remedial Investigation results for Parcel 6 (B-58) indicate subsurface soil contamination by Polyaromatic Hydrocarbons (PAHs), halogenated solvents, and Polychlorinated Biphenyls (PCBs). Groundwater test results indicate contamination by halogenated solvents, fuel-related Volatile Organic Compounds (VOCs), and metals. Contaminant concentrations in groundwater exceed CTDEP remediation standards based on surface water protection criteria. During pile driving operations for the construction of B-58, oil reportedly gushed from the ground around the piles. See EBS, p. 4-6.

In addition, the EBS states Site 27 (AOC No. 27) is located within Parcel 6 and is described as B-58 and associated hazardous waste satellite accumulation areas. The storage of jet fuel and 1,1,1-trichloroethane (TCA) at and around B-58 have been identified as Sites 27a and 27b (Table 4-1 of the EBS); however, no spills or releases have been reported. The EBS investigation identified no other known hazards in the parcel, however, there is the potential for lead paint to exist in B-58. See EBS, p. 4-6 and table attached to this summary, Enclosure 5b.

Finally, a recent asbestos survey also identified the presence of asbestos within B-58, but it is not in a friable condition. Therefore, it does not pose a risk to human health or the environment.

### **North Parking Lot**

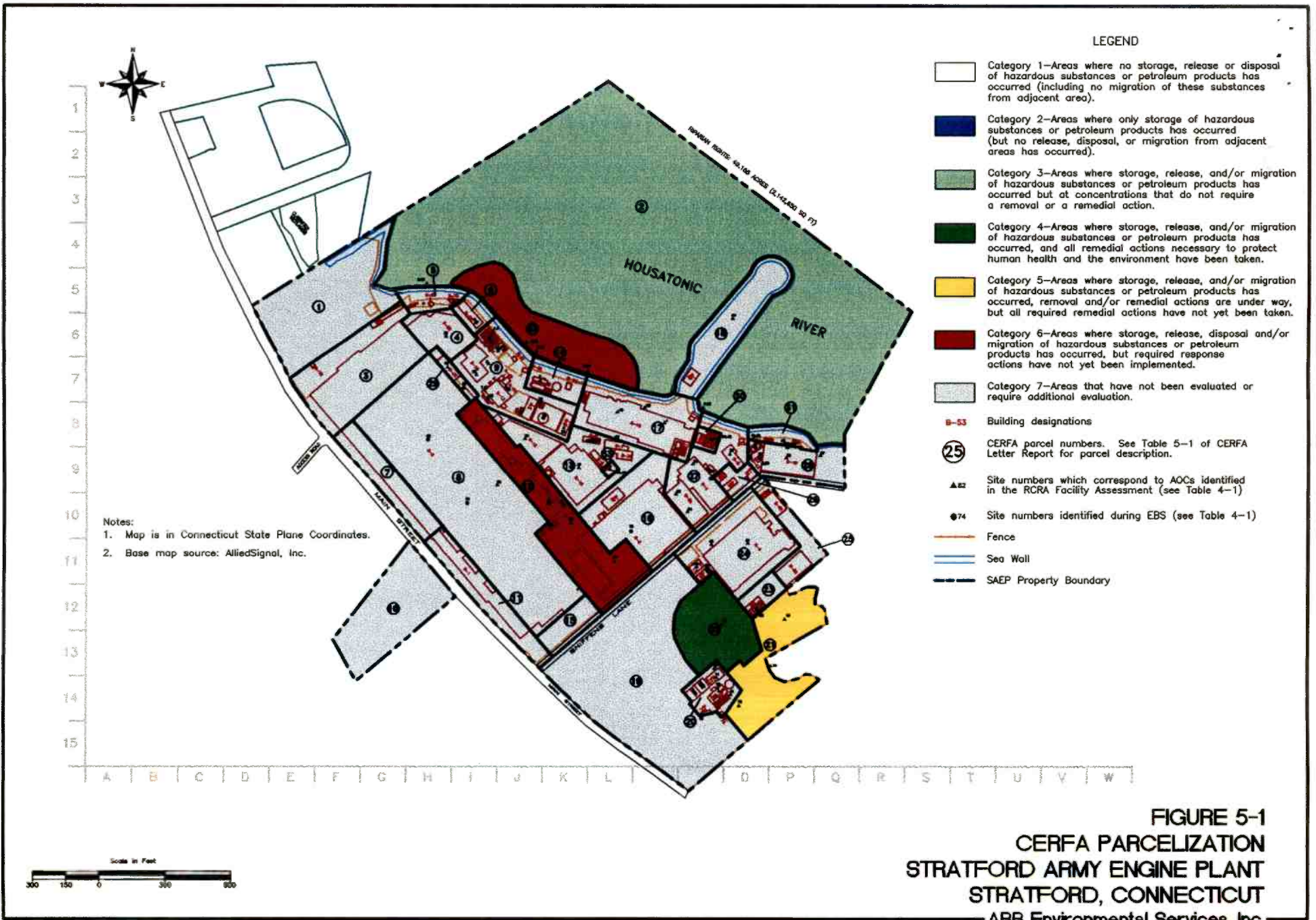
Approximately one acre of the North parking lot will be part of the proposed lease. The parking lot has an asphalt cap. It is included in CERFA Parcel 1 and is also listed as



CERFA Category 7 due to the possibility of contaminated ground water beneath the parking lot. There are no buildings in Parcel 1; therefore, no potential hazards such as asbestos, lead paint, radon, etc. See EBS, p. 4-3. The EBS states that aerial photographs taken in 1943 indicate the presence of possible pits or small lagoons. No disposal history is available for this area. Groundwater contamination by halogenated solvents in adjacent Parcel 3 indicates the potential for contamination beneath the Parcel 1. Contaminant concentrations in groundwater exceed CTDEP remediation standards based on surface water protection criteria. See EBS, p. 4-3.

ENCLOSURE 5a

SAEP CERFA PARCELIZATION MAP



ENCLOSURE 5b

NOTIFICATION OF HAZARDOUS SUBSTANCE  
RELEASES AND SPILLS CHART

**TABLE 1.  
EBS DATA FROM TABLE 4-1  
AND  
WORKSHEET A &B:**

Site Number	CERFA Parcel No.	Storage Site or Area	Substances Stored	Largest Quantity Stored	Length of Time of Storage	Is Notification of Storage Required Under CERCLA Section 120 (h)		Has a Release Occurred	
						Yes	No	Yes	No
27 a	6	Building B-58	Jet Fuel (Satellite Accumulation Area)	55 gallons	Pre 1991 to 1996	X		X see note 1	
27 b	6	Building B-58	1,1,1-TCA	>300 gallons	Pre 1991 to 1996	X			X
21 a	4	Building 65						X see note 2	
21 b	4	Building 65						X see note 3	

**Notes**

1. Oil was reportedly observed in the ground during pile driving for the construction of Building 58
2. Paint-contaminated soils (believed to be from zinc-chromate undercoating for Corsairs in the 1940s) were discovered and excavated to the low tide water level during the construction of Building B-65.
3. Petroleum -contaminated soils were also discovered during the B-65 excavation. At least some of this soil (with avg. Concs. < 300 mg/kg) has been moved to the south parking lot and used as sub grade fill beneath the asphalt. Excavated soil was likely industrial fill and debris, including battery cases.

ENCLOSURE 6

CULTURAL RESOURCES MEMORANDUM OF AGREEMENT



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND  
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333 - 0001

REPLY TO  
ATTENTION OF

AMCEN-R

19 NOV 1996

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Memorandum of Agreement (MOA) for Section 106  
Requirements for the Stratford Army Engine Plant

1. A copy of the signed Memorandum of Agreement for Section 106 requirements of the National Historic Preservation Act for the Closure and Disposal of Stratford Army Engine Plant is enclosed for your information.
2. Points of contact for this action are Mr. Donald Carter, AMCEN-R, DSN 767-9895 or commercial (703) 617-9895 and Mr. Stephen P. Austin, CESWF-PL-RC, commercial (817) 334-3246.
3. AMC -- America's Arsenal for the Brave.

FOR THE COMMANDER:

STANLEY H. FRIED  
Chief, Real Estate Management Division  
Office of the Deputy Chief of Staff  
for Engineering, Housing,  
Environment, and Installation  
Logistics

DISTRIBUTION:  
COMMANDER

U.S. Army Engineer District, Fort Worth, ATTN: CESWF-PL-RC  
(Mr. Stephen Austin), P.O. Box 17300, Fort Worth, TX  
76102-0300

U.S. Army Engineer District, New York, ATTN: CENAN-RE-M  
(Maria Anglada), Jacob K. Javits Federal Building, New York,  
NY 10278-0090

U.S. Army Tank-automotive and Armaments Command, ATTN:  
AMSTA-RM-XE (Pete Syzmanski), Warren, MI 48379-5000  
Stratford Army Engine Plant, ATTN: AMSTA-RM-B (Fred Hyatt), 550  
Main Street, Stratford, CT 06497-7593

Director, U.S. Army Environmental Center, ATTN: SFIM-AEC-EC,  
(Dr. David Guldenzopf), Aberdeen Proving Ground, MD 21010-5401

Deputy State Historic Preservation Officer, Connecticut  
Historical Commission, ATTN: Ms. Dawn Maddox, 59 South  
Prospect Street, Hartford, CT 06106-1901

**Advisory  
Council On  
Historic  
Preservation**

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The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

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OCT 21 1996

Earle C. Richardson  
Colonel, U.S. Army  
Deputy Chief of Staff  
Department of the Army  
Headquarters, U.S. Army Materiel Command  
5001 Eisenhower Avenue  
Alexandria, VA 22333-0001

REF: Closure and Disposal of Stratford Army Ammunition Plant  
Stratford, Connecticut

Dear Colonel Richardson:

The enclosed Memorandum of Agreement for the referenced project has been accepted by the Council. This acceptance completes the requirements of Section 106 of the National Historic Preservation Act and the Council's regulations. A copy of the Agreement has also been sent to the Connecticut State Historic Preservation Officer.

We appreciate your cooperation in reaching a satisfactory resolution of this matter.

Sincerely,



Martha Catlin  
Historic Preservation Specialist  
Office of Planning and Review

Enclosure



**MEMORANDUM OF AGREEMENT**

among

**THE UNITED STATES ARMY MATERIEL COMMAND,  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,  
and  
THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICER**

for the

**BASE CLOSURE AND DISPOSAL OF  
THE STRATFORD ARMY ENGINE PLANT, STRATFORD, CONNECTICUT**

1996

**WHEREAS** the U.S. Army Materiel Command (a Major Army Command (MACOM) of the United States Department of the Army) is responsible for the implementation of applicable provisions of the Defense Closure and Realignment Act of 1990 (P.L. 101-510), 1995 authorized action; and

**WHEREAS** the U.S. Army Materiel Command is proceeding with realignment of functions and units, closure of installations, and disposal of excess and surplus property in a manner consistent with the Defense Base Closure and Realignment Commission Report; and

**WHEREAS** the U.S. Army Materiel Command has determined that interim leasing, licensing and the subsequent disposal of Stratford Army Engine Plant will have an effect upon historic properties that are eligible for listing in the National Register of Historic Places, and has consulted with the Connecticut State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR § 800, regulations implementing Section 106 (16 U.S.C. § 470f) of the National Historic Preservation Act as amended through 1992 (NHPA) (16 U.S.C. 470 *et seq.*), Section 110 of the same Act (16 U.S.C. § 470h-2), and Section 111 of the same Act (16 U.S.C. § 470h-3); and

**WHEREAS** inventories of historic properties at Stratford Army Engine Plant have been completed and are known to include the Engine Assembly Plant (Building 2), its additions, and the Aircraft Engine Test Cells Building (Building 16), identified as historically important because of their association with WW II and because of their design work, and which are, by consensus determination, considered eligible for the National Register of Historic Places; and

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**WHEREAS** the inventory of historic properties at Stratford Army Engine Plant also includes an area considered to have potential archeological sensitivity located in the riparian rights area controlled by the Stratford Army Engine Plant; and

**WHEREAS** the U.S. Army Materiel Command has determined in consultation with the SHPO and in accordance with 36 CFR § 800.4 that existing information is adequate to identify all significant buildings, structures, objects, or archeological properties for the purpose of Section 106 of the NHPA and will not undertake further installation specific field surveys for identification for that purpose and that no other buildings, structures, sites, or objects at Stratford Army Engine Plant are considered eligible for the National Register of Historic Places; and

**WHEREAS** the area of potential effect for this agreement consists of the area within the installation boundaries only; and

**WHEREAS** interested members of the public, including the Governor's office of Connecticut, the Stratford Mayor's office, and others through public hearings, consultation meetings, and other means have been provided opportunities to comment on the effects that this installation closure and disposal may have on historic properties at the Stratford Army Engine Plant;

**NOW, THEREFORE**, the U.S. Army Materiel Command, the SHPO, and the Council agree that the undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties at Stratford Army Engine Plant, therefore satisfying the U.S. Army Materiel Command's Section 106, 110 and Section 111 responsibilities under the NHPA (16 U.S.C. 470 *et seq.*) at Stratford Army Engine Plant.

**STIPULATIONS** - The U.S. Army Materiel Command will ensure that the following measures are carried out:

**1. Disposal of Stratford Army Engine Plant Properties**

A. The U.S. Army Materiel Command will dispose of the entire Stratford Army Engine Plant property, including the historic properties described as the: 1942 Engine Assembly Plant (Building 2) and its additions, the Office Extension (1943-44), the Assembly Plant Addition (1944), and the North Factory Extension (1944); the Aircraft Engine Test Cells Building (Building 16) completed in 1952; and will potentially reassign the riparian rights area adjacent to the facility (see Attachment A).

B. In accordance with the provisions of the contract between the U.S. Army Materiel Command and the current contractor, AlliedSignal Aerospace, AlliedSignal Aerospace will

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continue to provide caretaker building maintenance, security, and fire protection at Stratford Army Engine Plant until the identified historic properties are assigned to another tenant activity or transferred from U.S. Army possession. These caretaker activities shall be conducted in accordance with Public Works Bulletin 420-10-08 (17 March 1993), Facilities Operation, Maintenance, and Repair Guidance for Base Realignment and Closing Installations (and subsequent revisions).

C. The U.S. Army Materiel Command proposes to offer the Stratford Army Engine Plant *in toto* to prospective buyers, including the historic properties described in 1.A. A preservation covenant for the National Register eligible buildings identified at Stratford Army Engine Plant has been previously developed by the U.S. Army Materiel Command in consultation with the SHPO and is included as Attachment B to this agreement. This covenant will be included in the instrument of transfer. The U.S. Army Materiel Command will notify the recipient of Stratford Army Engine Plant of this preservation covenant and their responsibilities under this agreement prior to final transfer of Stratford Army Engine Plant.

D. The riparian rights area is a use only area and may be assigned to the recipient of the property for in-kind use. Any action which could have the potential to modify the existing shore boundary or the land surface underlying the water use area shall require a Connecticut Department of Natural Resources Permit or a U.S. Army Corps of Engineers Clean Water Act permit before such action occurs as applicable. The U.S. Army Materiel Command will notify the recipient of the riparian rights area at Stratford Army Engine Plant of this stipulation and their responsibilities under this agreement prior to final transfer of the area.

E. If the marketing of Stratford Army Engine Plant fails to produce an *in toto* transfer of the property, the U.S. Army Materiel Command will offer the facility as separate parcels. Successful bidders for any of the historic properties identified in 1.A will be made aware of the preservation covenants described in 1.D and their responsibilities under this agreement prior to final transfer of any portion of Stratford Army Engine Plant.

F. The U.S. Army Materiel Command will ensure that all real property within Stratford Army Engine Plant is transferred subject to the recipient's formal agreement and acceptance of any preservation covenants associated with said real property. The formal agreement and acceptance of covenant restrictions shall be made part of the instrument transferring the ownership of the real property and shall be recorded in the real estate records of Fairfield County, Connecticut, and that the instrument transferring the property will incorporate the preservation covenant(s) as part of the legal document.

G. The U.S. Army Materiel Command will ensure that the historic properties identified at Stratford Army Engine Plant will be identified to the recipient and that the recipient

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further understands all rehabilitation and maintenance for said historic properties must be carried out in accordance with the *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Buildings* (U.S. Department of the Interior, National Park Service, 1992), in consultation with the SHPO.

## **2. Environmental Remediation**

A. The U.S. Army Materiel Command may treat historic properties at Stratford Army Engine Plant in accordance with the procedures for emergency undertakings under 36 CFR § 800.12 that are an imminent threat to health and safety and require an emergency response due to contamination by hazardous, toxic, and radiological substances. In situations where remediation must proceed without taking steps to preserve historic properties, due to immediate risks to health, safety, or the environment, the remediation will be fully described and justified.

B. Where there is not an immediate threat to health, safety, or environment, and additional environmental hazard testing or remediation is being considered at Stratford Army Engine Plant by the U.S. Army, the Stratford Army Engine Plant Base Environmental Coordinator (BEC) will coordinate with the U.S. Army Materiel Command to develop action plans which will provide descriptions of any potential conflicts between remediation and the preservation of historic properties. Where feasible, recommendations about how to resolve such conflicts will be included in the action plan. The U.S. Army Materiel Command will coordinate the development of environmental remediation action plans with the SHPO. The SHPO will be permitted to review and comment on the potential effects of remediation to the historic properties and any proposed recommendations.

## **3. Dispute Resolution**

A. Should any party to this agreement object within thirty (30) days to any plans or documents provided by the U.S. Army Materiel Command or others for review pursuant to this agreement, or to any actions proposed or initiated by the U.S. Army Materiel Command at Stratford Army Engine Plant that may pertain to the terms of this agreement, the U.S. Army Materiel Command shall consult with the objecting party to resolve the objection. If the U.S. Army Materiel Command determines that the dispute cannot be resolved, the U.S. Army Materiel Command shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days of receipt of all pertinent documentation, the Council will either:

1. Provide the U.S. Army Materiel Command with recommendations, which the U.S. Army Materiel Command will take into consideration in reaching a final decision regarding the dispute; or

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2. Notify the U.S. Army Materiel Command that it will comment pursuant to 36 CFR § 800.6(b), and prepare the comment. Any Council comment provided in response to a request for comment will be taken into account by the U.S. Army Materiel Command in accordance with 36 CFR § 800.6(c)(2) with reference to the dispute.

B. Any recommendation or comment provided by the Council pursuant to the above will be understood to pertain only to the subject of the dispute; the U.S. Army Materiel Command's responsibility to carry out all actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during the implementation of the measures stipulated in this agreement, should an objection to any such measure or its manner of implementation be raised by interested persons, the U.S. Army Materiel Command shall take the objection into account and consult as needed with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

#### **4. Amendments**

A. Any party to this agreement may request that it be amended, whereby the parties will consult in accordance with 36 CFR § 800.13 to consider such revision.

B. If it is determined that revisions are necessary, the parties shall consult pursuant to 36 CFR § 800.5(e)(5) to make such revisions. The U.S. Army Materiel Command will prepare the language for any proposed revisions and submit it to the other parties for review. Reviewing parties must comment on or signify their acceptance of the proposed changes to the MOA within thirty (30) days of receipt of the U.S. Army Materiel Command submission.

#### **5. Status Reports**

Six (6) months after this agreement is executed and every six (6) months thereafter, if required, until Stratford Army Engine Plant properties described in 1.A. have been transferred from U.S. Army Materiel Command control, in accordance with the terms of this agreement, the U.S. Army Materiel Command will provide status reports to the Council and Connecticut SHPO to review implementation of the terms of this agreement and determine if amendments are needed. If amendments are needed, the parties will consult in accordance with Stipulation 8 of this agreement to make such revisions.

#### **6. Termination of Agreement**

A. Any party to this MOA may terminate it by providing thirty (30) days notice to the other parties, providing the other parties consult during the period prior to termination to

seek agreement on amendments or other actions that would avoid termination. In the event of termination prior to completing the transfer of all or any portion of Stratford Army Engine Plant to prospective purchasers, the U.S. Army Materiel Command will comply with 36 CFR § 800.4 through 800.6 with regard to individual undertakings covered by this MOA.

B. After the transfer of the historic properties described in 1.A has taken place and the covenants properly recorded with the record of transfer, the U.S. Army Materiel Command will consider the terms of this agreement fulfilled and no further consultation with the SHPO or Council will be required.

## 7. Execution

Execution and implementation of this Memorandum of Agreement evidences that the U.S. Army Materiel Command has afforded the Connecticut State Historic Preservation Officer and the Advisory Council on Historic Preservation a reasonable opportunity to comment on the disposal of Stratford Army Engine Plant, and that the U.S. Army Materiel Command has taken into account the effects of the undertaking on any historic properties in accordance with Sections 106, 110 and Section 111 of the National Historic Preservation Act (16 U.S.C. 470 *et seq.*).

DEPARTMENT OF THE ARMY  
U.S. ARMY MATERIEL COMMAND

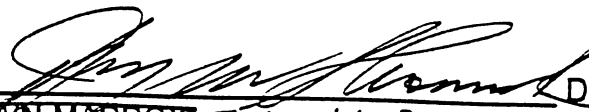
By: Billy K. Solomon Date: 22 Jul 96  
MAJOR GENERAL BILLY K. SOLOMON  
Chief of Staff, U.S. Army Materiel Command

ADVISORY COUNCIL ON HISTORIC PRESERVATION

for By: Robert D. Bush Date: 10/21/96  
ROBERT D. BUSH  
Executive Director  
Advisory Council on Historic Preservation

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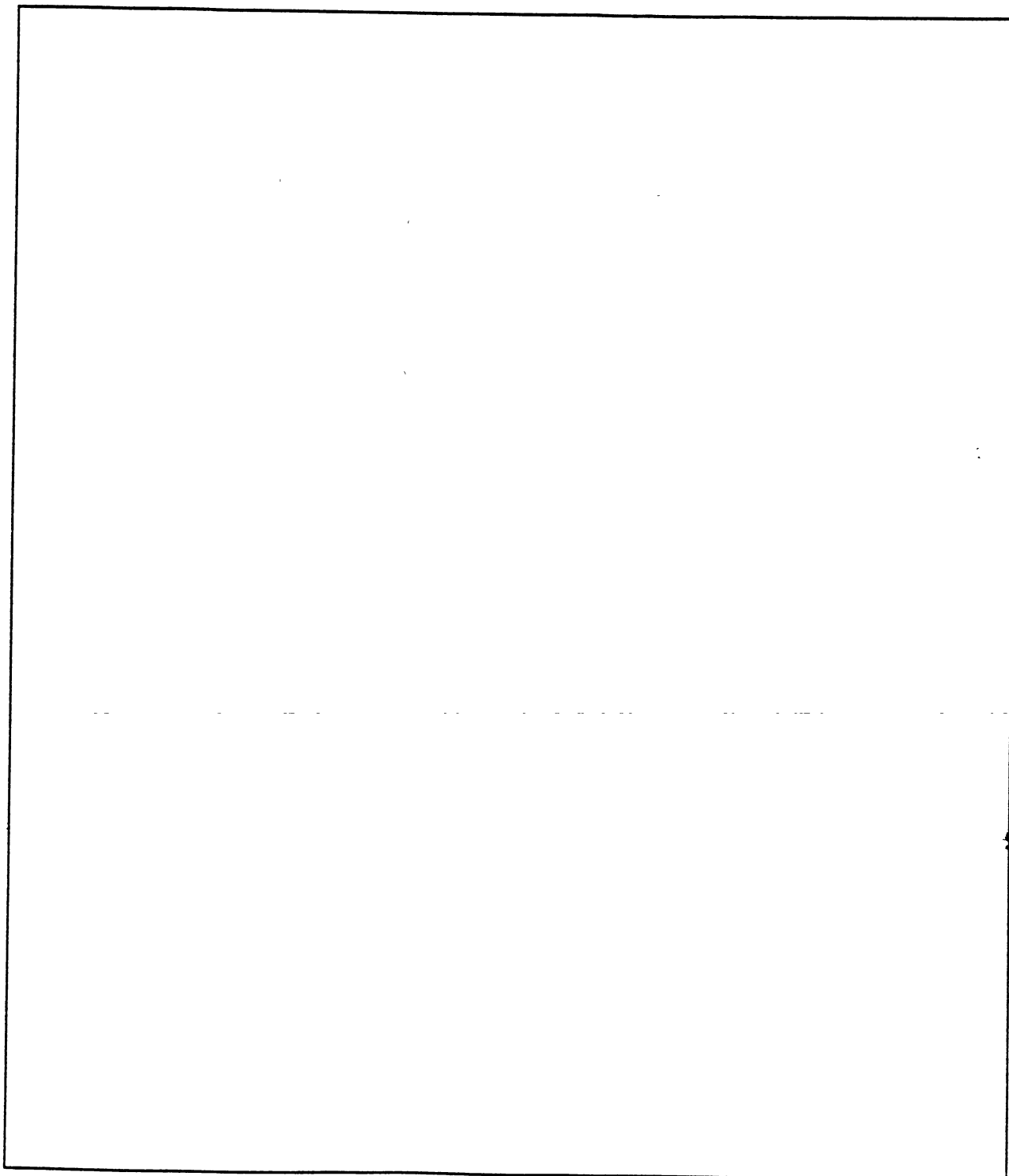
CONNECTICUT HISTORICAL COMMISSION

By:  Date: 7/29/96  
~~SARAH MASDOX~~ JOHN W. STANWATH  
~~Deputy~~ Connecticut State Historic Preservation Officer

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ATTACHMENT A: MAP A-1

AREA MAP OF STRATFORD ARMY ENGINE PLANT SHOWING BUILDINGS





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ATTACHMENT B:

PRESERVATION COVENANT FOR HISTORIC BUILDINGS

In Consideration of the conveyance of certain improved real property, hereinafter referred to as Stratford Army Engine Plant, located near the City of Stratford, Fairfield Counties, State of Connecticut, which is more fully described as:

[Insert legal description]

The [Recipient of property] hereby covenants on behalf of [him/her/it/self] and assigns at all times to the United States Army Materiel Command and the Connecticut State Historic Preservation Officer to maintain and preserve the: Engine Assembly Plant (Building 2) and its additions, the Office Extension, the Assembly Plant Addition, and the North Factory Extension; and the Aircraft Engine Test Cells Building (Building 16), in a manner that preserves the structure of Stratford Army Engine Plant, the exterior facades, the fenestration, scale, color, use of material, mass, immediate landscape, and views from, to and across the referenced structures, which are attributes that contribute to defining the character of the historic period which they represent, as follows:

1. The [Recipient of property] shall preserve and maintain the buildings identified above in accordance with the recommended approaches found in the *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitation of Historic Buildings* (U.S. Department of the Interior, National Park Service, 1992), and in the National Park Service's technical series on preservation and repairs for historic buildings, *Historic Buildings Preservation Briefs Series 1-14*, as appropriate, in order to preserve and enhance those qualities that make portions of Stratford Army Engine Plant eligible for inclusion in the National Register of Historic Places.

2. No construction, modifications, alterations, remodeling, or any other thing (except as defined in Part 3 of this covenant), shall be undertaken or permitted to be undertaken on Building 2 and its additions or Building 16 at Stratford Army Engine Plant which would affect the integrity or the appearance of those structures without the express prior written permission of the Connecticut State Historic Preservation Officer, signed by a fully authorized representative thereof.

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3. Activities regarding Building 2 or Building 16 which will require no consultation with the Connecticut State Historic Preservation Officer shall include:

A. Interior:

1. Plumbing rehabilitation and replacement: including pipes and fixtures.
2. Heating system rehabilitation and replacement: including furnaces, pipes, radiators or other heating units.
3. Electrical wiring: including wiring and receptacles.
4. Restroom improvements for handicapped access: provided that the work is contained within an existing restroom.
5. Interior treatments (floors, walls, ceilings, woodwork): provided the work is limited to painting, refinishing, repapering or laying carpet or other suitable flooring material. Construction of temporary walls (timber or steel framed with drywall finish) is permitted. No removal of existing interior doors, permanent interior walls, floors, or support columns, original to the period of significance, will be permitted.
6. Insulation: provided it is restricted to ceilings and attic spaces.

B. Exterior:

1. Caulking, weatherstripping, reglazing.
2. Sidewalk and curbing replacement.
3. Gutters and downspout replacement.
4. Roof repair or replacement which uses in-kind materials.
5. Storm windows: provided they conform to the original shape and size of the historic windows and that the meeting rail coincides with that of the existing sash. Color should match existing windows and trim.
6. In-kind replacement: this is understood to mean that the new features or replacement items will duplicate the material, dimensions and detailing of the original. No removal of existing exterior doors, enlarging or filling in of door and window openings, or removal of permanent exterior walls, original to the period of significance, will be permitted.
  - a. Porches and loading platforms: stairs, railings, posts and columns, brackets, cornices, and flooring.
  - b. Roofs.
  - c. Siding.
  - d. Exterior architectural details and feature: including but not limited to brickwork, lintels, and trim.
  - e. Windows: includes both trim and the sash.
  - f. Doors.
7. Clean and seal treatments which do not include sand blasting or the use of chemicals which have not been approved for use by the Connecticut SHPO.

- 
4. The Connecticut State Historic Preservation Officer shall be permitted at all reasonable times to inspect Building 2 or Building 16 at Stratford Army Engine Plant in order to ascertain if the above conditions are being observed.
  5. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Connecticut State Historic Preservation Officer may, following reasonable notice to **[Recipient of property]**, notify the Advisory Council on Historic Preservation of said violations.
  6. The **[Recipient of property]** agrees that the Connecticut State Historic Preservation Officer may at its discretion, without prior notice to the **[Recipient of property]**, convey and assign all or part of its rights and responsibilities contained herein to a third party.
  7. This covenant is binding on the **[Recipient of property]**, **[his/her/its]** successors, and assigns, in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by the **[Recipient of property]** verbatim or by express reference in any deed, lease, or other legal instrument by which it divests itself of either the fee simple title or any other lesser estate in Stratford Army Engine Plant or any part thereof.
  8. The failure of the Connecticut State Historic Preservation Officer to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

The covenant shall be a binding servitude upon Stratford Army Engine Plant and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence that the **[Recipient of property]** agrees to be bound by the foregoing conditions and restrictions and to perform to obligations herein set forth.

ENCLOSURE 7a

SAEP NOTIFICATION LETTER TO USEWS



**DEPARTMENT OF THE ARMY**  
UNITED STATES ARMY TANK-AUTOMOTIVE AND ARMAMENTS COMMAND  
WARREN, MICHIGAN 48397-50000

REPLY TO  
ATTENTION OF

November 27, 1996

U.S. Fish & Wildlife Service  
Region V  
Division of Endangered Species  
Attn: Paul Nickerson  
300 Westgate Center Drive  
Hadley Mass 01035

Dear Mr. Nickerson:

The Stratford Army Engine Plant (SAEP) is a Government-Owned, Contractor - Operated (GOCO) facility in Stratford, Connecticut which manufactured turbine engines for the Abrams tank and military and commercial aircraft. SAEP is subject to closure pursuant to the Defense Base Closure and Realignment Act (BRAC) of 1990 (P.L. 101-510, 104 Stat. 1808). This property has been declared surplus by the Army and it is the intent of the Army to dispose of this property in accordance with BRAC. A Local Reuse Authority (LRA) has been formed to organize and develop a suitable reuse plan to allow the transfer of the property. The target date for the transfer is 2001.

Once a decision has been made under BRAC to close or realign an installation, property may be made available for interim use, if it can be done in compliance with environmental requirements and without adversely affecting its mission. Currently, a major industrial company has expressed an interest in leasing two buildings (Buildings 65 and 58) for continued industrial use at SAEP to "manufacture sophisticated state of the art vertical and horizontal CNC single and multi spindle metal turning machines. These machines are used in several industries around the world by leading manufacturers." This company intends to develop a new prototype and ultimately manufacture a new generation of machine tools for the world market at this site. See the attached figure 1 and site map. Building 65 is currently being used by the Army's contractor for production work. Building 58 is currently idle. The leasing of these buildings is covered under the National Environmental Policy Act (NEPA) as a categorical exclusion, A-24. See Army Regulation 200-2, "Environmental Effects of Army Actions", Appendix A, "...grants of leases, ... for use of excess or surplus property without significant change in land use." The referenced Appendix is included as attachment 3. In this case, the buildings will continue to be used for an industrial purpose.

The United States Army Tank-Automotive and Armaments Command (TACOM), the property owner, does not anticipate any adverse environmental impacts or effects, including those to fish and wildlife, stemming from the action of an interim lease for these buildings. It should also be noted that an Environmental Baseline Survey (EBS) has already been prepared for SAEP dated July 1996. The EBS is a compilation of existing environmental data and is used to direct future

remedial investigation and clean up. The EBS indicates that the U.S. Fish and Wildlife Service (USFWS), the National Marine Fisheries (NMFS), and the Connecticut Department of Environmental Protection (CTDEP) were contacted to obtain information on federal- and/or state-listed Threatened & Endangered species that have been reported to occur near the SAEP. The EBS does not indicate any federally listed species on the site.

In addition, an Environmental Impact Statement (EIS) in accordance with ( NEPA) will be prepared incorporating the approved reuse plan and describing the environmental impacts and remediation, if any, in detail. This document is expected to be completed in 1998. A natural resource study will be completed for the EIS and coordinated with you. It will include existing data about the area, and undertake new investigation or updates where data is required.

Also, a NEPA scoping meeting will be held on December 4, 1996 at 7:30 pm at the Council Chambers, Stratford Town Hall, 2725 Main St. Stratford Ct. Request that any written comments you may have regarding the EIS be forwarded to Mr. Joe Hand, U.S. Army Corps of Engineers, Mobile District, P.O. Box 2288, Mobile AL 36628-0001 before December 18, 1996.

Finally, during the course of the EIS development there may be further need to coordinate with your office regarding the natural resource survey and I want to extend my appreciation in advance for any assistance you can provide. Should you have any question my commercial telephone number is area code 203 385-4316 and my fax number area code 203 385- 4317.



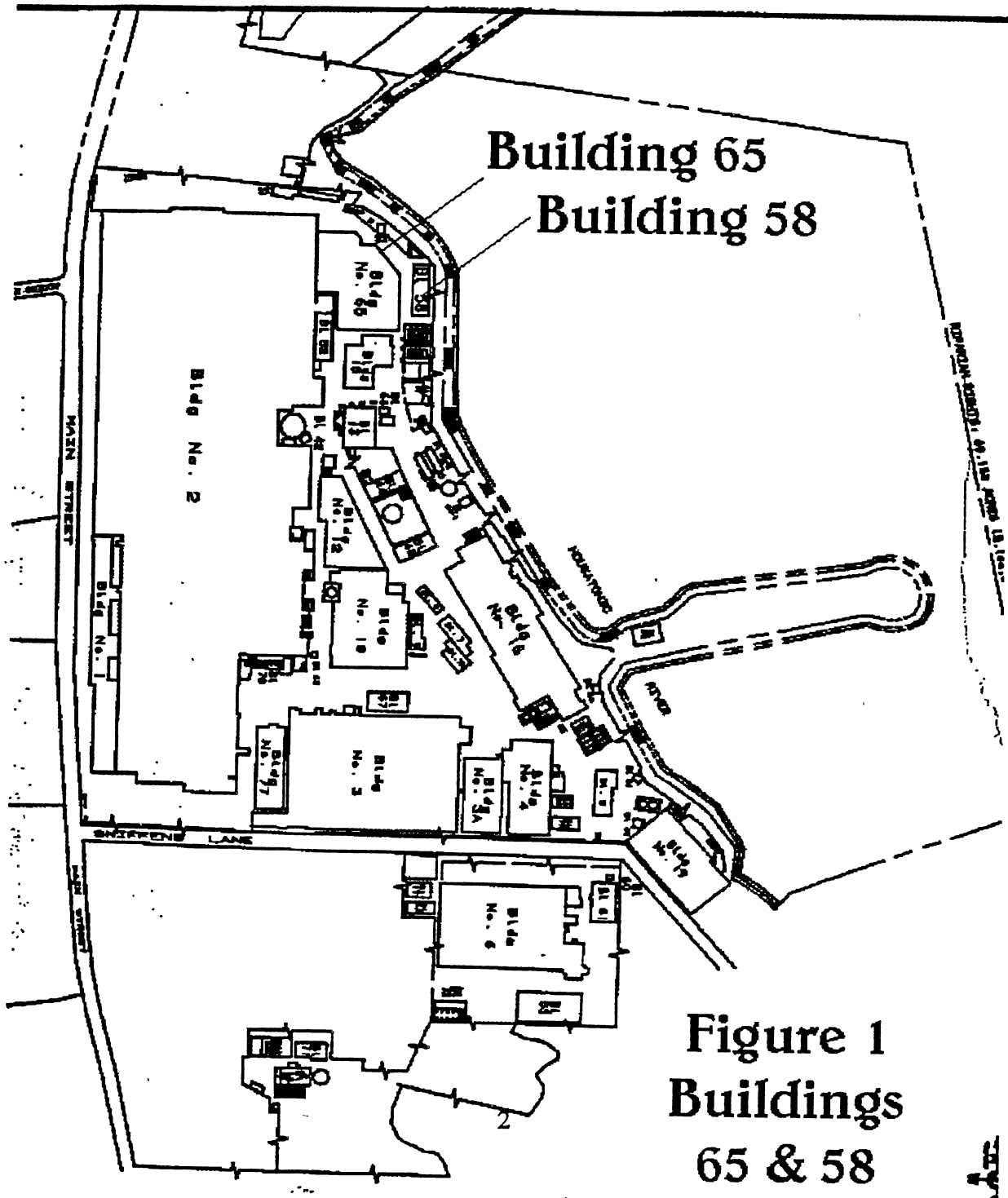
Tom Yourk  
BRAC Environmental Coordinator (BEC)  
Stratford Army Engine Plant

CF:  
Mr. Michael Bartlett  
Field Supervisor  
U.S. States Fish & Wildlife Service  
22 Bridge St.  
Concord NH 03301

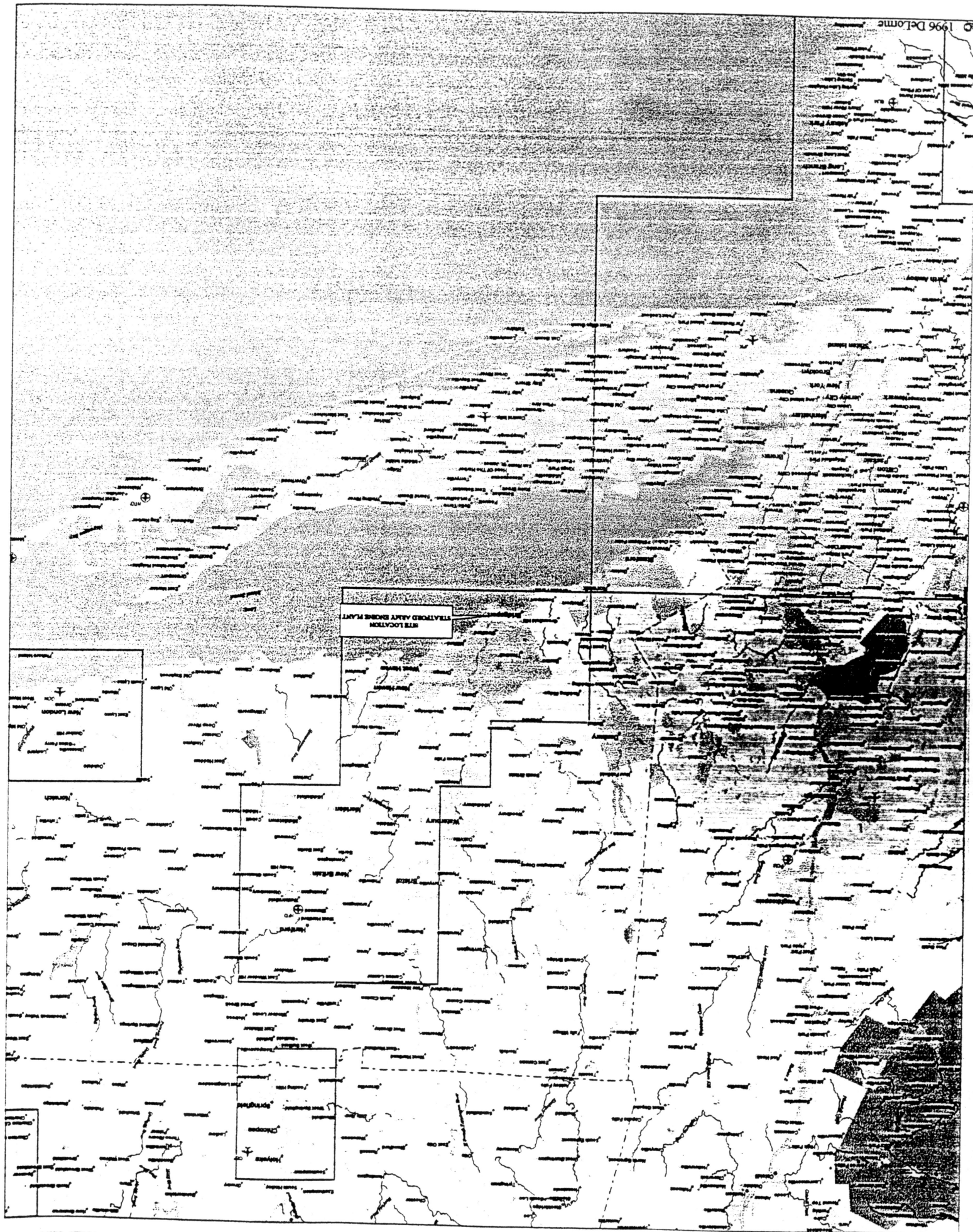
Attachments:

1. Figure 1. ,
2. Site map.
3. Appendix A.

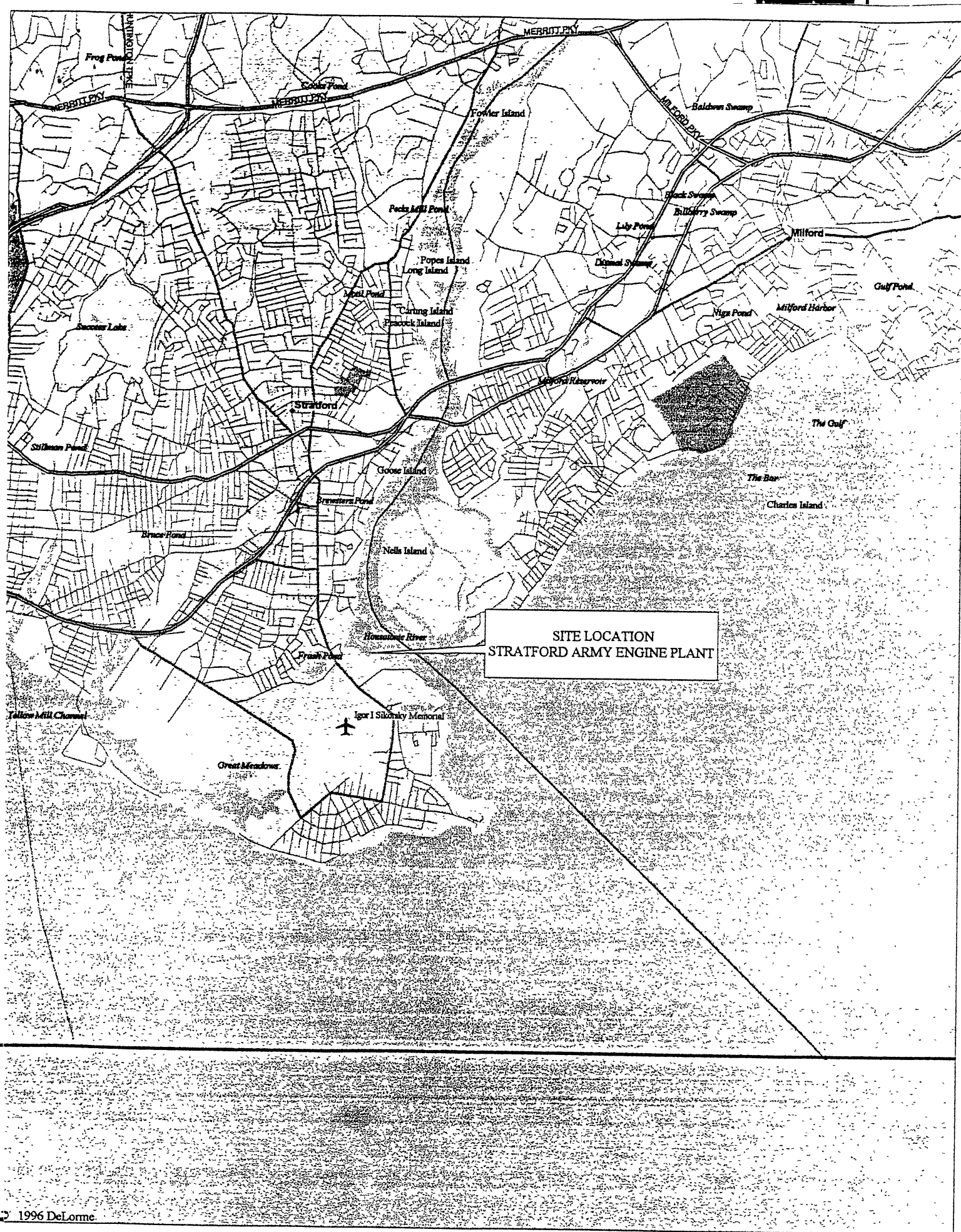
The property shown on the site map (Figure 1) is Army-owned land at SAEP consisting of approximately 115 acres, of which approximately 76 acres are improved land and 39 acres are riparian rights.



**Figure 1**  
**Buildings**  
**65 & 58**







SITE LOCATION  
STRATFORD ARMY ENGINE PLANT

Effective 23 January 1989

Environmental Quality

Environmental Effects of Army Actions

This UPDATE printing publishes a revision of this publication. Because the publication has been extensively revised, the changed portions have not been highlighted.

By Order of the Secretary of the Army:

CARL E. VUONO  
General, United States Army  
Chief of Staff

Official:

*Milton H. Hamilton*

MILTON H. HAMILTON  
Administrative Assistant to the  
Secretary of the Army

**Summary.** This regulation establishes policy, procedures, and responsibilities for assessing the environmental effects of Army actions. It implements the Council on Environmental Quality's National Environmental Policy Act regulations, Executive Order 12114, DOD Directive 6050.1, and DOD Directive 6050.7.

**Applicability.** This regulation applies to the Active Army, Army National Guard (ARNG), and the U.S. Army Reserve (USAR). It applies to proposals and activities of the ARNG involving Federal funding. It does not apply to the Civil Works functions of the Corps of Engineers nor to combat or combat-related activities in a combat zone.

**Impact on New Manning System.** This regulation does not contain information that affects the New Manning System.

**Internal control systems.** This regulation is subject to the requirements of AR 11-2. It contains internal control provisions but does not contain checklists for conducting internal control reviews. These checklists are being developed and will be published at a later date.

**Supplementation.** Supplementation of this regulation and establishment of command and local forms are prohibited without prior approval from the Army Environmental Office, WASH DC 20310-1000.

**Interim changes.** Interim changes to this regulation are not official unless they are authenticated by the Administrative Assistant to the Secretary of the Army. Users will destroy interim changes on their expiration dates unless sooner superseded or rescinded.

**Suggested improvements.** The proponent agency of this regulation is the Office of the Chief of Engineers. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) directly to HQDA, WASH DC 20310-1000.

**Distribution.** Active Army, C; ARNG, A; and USAR, A.

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\*This regulation supersedes AR 200-2, 1 September 1981.

**Appendix A**  
**List of Categorical Exclusions**  
**(CX)**

**Section I**  
**List of categorical exclusions (CX)**

**A-1.** Normal personnel, fiscal, and administrative activities involving military and civilian personnel (recruiting, processing, paying, and records keeping).

**A-2.** Law and order activities performed by military police and physical plant protection and security personnel, excluding formulation and/or enforcement of hunting and fishing policies or regulations that differ substantively from those in effect on surrounding non-Army lands.

**A-3.** Recreation and welfare activities not involving off-road recreational vehicle management.

**A-4.** Commissary and Post Exchange (PX) operations, except where hazardous material is stored or disposed.

**A-5.** Routine repair and maintenance of buildings, roads, airfields, grounds, equipment, and other facilities, to include the layaway of facilities, except when requiring application or disposal of hazardous or contaminated materials.

**A-6.** Routine procurement of goods and services, including routine utility services.

**A-7.** Construction that does not significantly alter land use, provided the operation of the project when completed would not of itself have a significant environmental impact; this includes grants to private lessees for similar construction. (REC required.)

**A-8.** Simulated war games and other tactical and logistical exercises without troops.

**A-9.** Training entirely of an administrative or classroom nature.

**A-10.** Storage of materials, other than ammunition, explosives, pyrotechnics, nuclear, and other hazardous or toxic materials.

**A-11.** Operations conducted by established laboratories within enclosed facilities where—

a. All airborne emissions, waterborne effluents, external radiation levels, outdoor noise, and solid bulk waste disposal practices are in compliance with existing Federal, State, local laws, and regulations.

b. No animals that must be captured from the wild are used as research subjects, excluding reintroduction projects. (REC required.)

**A-12.** Developmental and operational testing on a military installation, where the tests are conducted in conjunction with normal military training or maintenance activities so that the tests produce only incremental impacts, if any and provided that the training and maintenance activities have been adequately assessed, where required, in other Army environmental documents. (REC required.)

**A-13.** Routine movement of personnel; routine handling and distribution of non-hazardous and hazardous materials in conformance with DA, EPA, Department of Transportation, and State regulations.

**A-14.** Reduction and realignment of civilian and/or military personnel that fall below the thresholds for reportable actions as prescribed by statute or AR 5-10. (REC required.)

**A-15.** Conversion of commercial activities (CA) to contract performance of services from in-house performance under the provisions of DOD Directive 4100.15.

**A-16.** Preparation of regulations, procedures, manuals, and other guidance documents that implement, without substantive change, the applicable HQDA or other federal agency regulations, procedures, manuals, and other guidance documents that have been environmentally evaluated.

**A-17.** Acquisition, installation, and operation of utility and communication systems, data processing, cable, and similar electronic equipment that use existing rights of way, easements, distribution systems, and facilities.

**A-18.** Activities that identify or grant permits to identify, the state of the existing environment (for example, inspections, surveys, and investigations) without alteration of that environment or capture of wild animals.

**A-19.** Deployment of military units on a temporary duty (TDY) basis where existing facilities are used and the activities to be performed have no significant impact on the environment. (REC required.)

**A-20.** Grants of easements for the use of existing rights-of-way for use by vehicles; electrical, telephone, and other transmission and communication lines; transmitter and relay facilities; water, wastewater, stormwater, and irrigation pipelines, pumping stations, and facilities; and for similar public utility and transportation uses. (REC required.)

**A-21.** Grants of leases, licenses, and permits to use existing Army controlled property for non-Army activities, provided there is an existing land-use plan that has been environmentally assessed and the activity

will be consistent with that plan. (REC required.)

**A-22.** Grants of consent agreements to use a Government-owned easement in a manner consistent with existing Army use of the easement; disposal of excess easement areas to the underlying fee owner. (REC required.)

**A-23.** Grants of licenses for the operation of telephone, gas, water, electricity, community television antenna, and other distribution systems normally considered as public utilities. (REC required.)

**A-24.** Transfer of real property administrative control within the Army, to another military department, or other Federal agency, including the return of public domain lands to the Department of Interior and reporting of property available for outgranting; and grants of leases, licenses, permits, and easements for use of excess or surplus property without significant changes in land use. (REC required.)

**A-25.** Disposal of uncontaminated buildings and other improvements for removal off-site. (REC required.)

**A-26.** Studies that involve no commitment of resources other than manpower. (REC required.)

**A-27.** Study and test activities within the procurement program for Military Adaptation of Commercial Items for items manufactured in the U.S. (REC required.)

**A-28.** Development of table organization and equipment documents, no fixed location or site.

**A-29.** Grants of leases, licenses, and permits to use DA property for or by another governmental entity when such permission is predicated upon compliance with the NEPA. (REC required.)

**Section II**  
**Screening criteria**

**A-30.** A CX is a category of actions that do not individually or cumulatively have a significant effect on the human environment and for which, therefore, neither an EA nor an EIS is required.

**A-31.** A CX may be used only when the criteria of paragraphs 4-1 and 4-2 have been applied and each of the following are true:

a. This action is not a major federal action significantly affecting the quality of the human environment.

b. There are minimal or no individual or cumulative effects on the environment as a result of this action.

ENCLOSURE 7b

USEWS CONCURRENCE LETTER TO SAEP NOTIFICATION



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
New England Field Office  
22 Bridge Street, Unit #1  
Concord, New Hampshire 03301-4986

January 3, 1997

Tom Yourk  
BRAC Environmental Coordinator  
Stratford Army Engine Plant  
550 Main St.  
Stratford, CT 06497

Dear Mr. Yourk:

This responds to your letter dated November 27, 1996, for information on the presence of federally-listed and proposed, endangered or threatened species in accordance with environmental planning for the lease of a portion of the Stratford Army Engine Plant.

Based on information currently available to us, no federally-listed or proposed, threatened and endangered species under the jurisdiction of the U.S. Fish and Wildlife Service are known to occur in the project area, with the exception of occasional, transient bald eagles (*Haliaeetus leucocephalus*) or peregrine falcons (*Falco peregrinus*).

Preparation of a Biological Assessment or further consultation with us under Section 7 of the Endangered Species Act is not required. Should project plans change, or additional information on listed or proposed species becomes available, this determination may be reconsidered.

A list of federally-designated endangered and threatened species in Connecticut is enclosed for your information. Thank you for your cooperation and please contact Michael Amaral of this office at 603-225-1411 if we can be of further assistance regarding endangered species.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael J. Bartlett", is written over a horizontal line.

Michael J. Bartlett  
Supervisor  
New England Field Office

Enclosure

**FEDERALLY LISTED ENDANGERED AND THREATENED SPECIES  
IN CONNECTICUT**

<u>Common Name</u>	<u>Scientific Name</u>	<u>Status</u>	<u>Distribution</u>
<b>FISHES:</b>			
Sturgeon, shortnose*	<u>Acipenser brevirostrum</u>	E	Connecticut River & Atlantic Coastal Waters
<b>REPTILES:</b>			
Turtle, green*	<u>Chelonia mydas</u>	T	Oceanic straggler in southern New England
Turtle, hawksbill*	<u>Eretmochelys imbricata</u>	E	Oceanic straggler in southern New England
Turtle, leatherback*	<u>Dermochelys coriacea</u>	E	Oceanic summer resident
Turtle, loggerhead*	<u>Caretta caretta</u>	T	Oceanic summer resident
Turtle, Atlantic ridley*	<u>Lepidochelys kempii</u>	E	Oceanic summer resident
<b>BIRDS:</b>			
Eagle, bald	<u>Haliaeetus leucocephalus</u>	T	Hartford, entire state- migratory
Falcon, American peregrine	<u>Falco peregrinus anatum</u>	E	No current nesting; entire state-migratory
<del>Falcon, Arctic peregrine</del>	<del><u>Falco peregrinus tundrius</u></del>	<del>T</del>	<del>Entire state migratory--- no nesting</del>
Plover, Piping	<u>Charadrius melodus</u>	T	Atlantic coast
Roseate Tern	<u>Sterna dougallii dougallii</u>	E	Atlantic coast
<b>MAMMALS:</b>			
Whale, blue*	<u>Balaenoptera musculus</u>	E	Oceanic
Whale, finback*	<u>Balaenoptera physalus</u>	E	Oceanic
Whale, humpback*	<u>Megaptera novaeangliae</u>	E	Oceanic
Whale, right*	<u>Eubalaena</u> spp. (all species)	E	Oceanic
Whale, sei*	<u>Balaenoptera borealis</u>	E	Oceanic
Whale, sperm*	<u>Physeter catodon</u>	E	Oceanic
<b>MOLLUSKS:</b>			
Mussel, dwarf wedge	<u>Alasmidonta heterodon</u>	E	Hartford County
<b>INSECTS:</b>			
<del>Beetle, puritan tiger</del>	<del><u>Cicindela puritana</u></del>	<del>T</del>	<del>Middlesex, Conn. River Valley</del>
Beetle, northeastern beach tiger	<u>Cicindela dorsalis dorsalis</u>	T	Extirpated, coastal beaches
<b>PLANTS:</b>			
Small Whorled Pogonia	<u>Isotria medeoloides</u>	T	Hartford, New Haven, Fairfield, New London, Windham, Tolland, Middlesex, Litchfield Counties
Sandplain Gerardia	<u>Agalinus acuta</u>	E	Hartford

\* Except for sea turtle nesting habitat, principal responsibility for these species is vested with the National Marine Fisheries Service

ENCLOSURE 8

CHPPM RADIATION SURVEY RESULTS  
(TO BE PROVIDED UNDER SEPARATE COVER)

ENCLOSURE 9

LEASE ENVIRONMENTAL PROTECTION PROVISIONS



**STRATFORD ARMY ENGINE PLANT  
BUILDINGS 65 AND 58  
AND PORTION OF NORTH PARKING LOT**

**ENVIRONMENTAL PROTECTION LEASE PROVISIONS**

1. The following conditions will be placed in the lease to ensure (a) there will be no unacceptable risk to human health or the environment, (b) there will be no interference with any ongoing environmental cleanup or potential remediation projects; and, (3) any federal, state, and local regulatory requirements and other compliance programs administered by the Army are met at Stratford Army Engine Plant (SAEP) during the duration of the lease.

2. The lessee shall neither transfer nor assign this lease or any interest therein or any property on the leased premises, nor sublet the leased premises or any part thereof or any property thereon, nor grant any interest, privilege, or license whatsoever in connection with this lease without the prior written consent of the Government. Such consent shall not be unreasonably withheld or delayed. Every lease or sublease shall contain the environmental protection provisions contained herein.

3. The lessee and any sublessee shall be solely responsible for obtaining at its own cost and expense any regulatory or environmental permits required for its operation under the lease, independent of any existing SAEP permits. The lessee and any other sublessee shall also be required to obtain their own Environmental Protection Agency (EPA) Identification Number, if applicable.

4. The lessee and any sublessee shall comply with the applicable federal, state, and local environmental laws, regulations, and standards that are or may become applicable to lessee's and any sublessee's activities on the leased premises.

5. The lessee and any sublessee shall not disrupt, inflict damage, obstruct, or impede on-going environmental restoration work on the leased premises.

6. The government's rights under a lease specifically include the right for government officials to inspect upon reasonable notice the leased premises for compliance with environmental, safety, and occupational health laws and regulations, whether or not the government is responsible for enforcing them. Such inspections are without prejudice to the right of duly constituted enforcement officials to make such inspections. The government normally will give the lessee or sublessee twenty-four (24) hours prior notice of its intention to enter the leased premises unless it determines the

entry is required for safety, environmental, operations, or security purposes. The lessee and/or any sublessee shall have no claim on account of any entries against the United States or any officer, agent, employee, or contractor thereof.

7. The government and its officers, agents, employees, contractors, and subcontractors will have the right, upon reasonable notice to the lessee and any sublessee, to enter upon the leased premises for the purposes enumerated in this subparagraph:

a. To conduct investigations and surveys, including, where necessary, drilling, sample collection, and other activities related to SAEP's BRAC Program and any other environmentally related compliance programs.

b. To inspect field activities of the government and its contractors and subcontractors in implementing the SAEP BRAC Program and other environmentally related programs.

c. To conduct any test or survey related to the implementation of the SAEP BRAC Program or other environmental compliance programs at the leased premises to collect or verify any data required by the EPA or the State of Connecticut, relating to the environmental condition of the property.

d. To construct, operate, maintain or undertake any other corrective measure, response, or remedial action as required or necessary under any Federal, State, or local law or regulatory requirement; including, but not limited to, monitoring wells, pumping wells, and treatment facilities.

8. The lessee and any sublessee will agree to comply with the provisions of appropriate SAEP health or safety plans in effect during the course of any of the above described actions. Any inspection, survey, investigation, or other corrective measure, response or remedial action will, to the extent practicable, be coordinated with representatives designated by the lessee and any sublessee. The lessee and sublessee shall have no claim on account of such entries against the United States or any officer, agent, employee, contractor, or subcontractor thereof.

9. The lessee and any sublessee shall submit to the Army, and maintain thereafter, an Environmental Compliance Plan, which describes, in detail, the lessee's and any sublessee's program for environmental management. The lessee and any sublessee will be responsible for overall compliance of its operations. The lessee and any sublessee will be responsible for preparation of all documents, records, and reports associated with environmental compliance of its operations.

10. The lessee and any sublessee shall strictly comply with the hazardous waste management requirements under the Resource Conservation and Recovery Act (RCRA) and the State of Connecticut's Hazardous Waste Management Rules including proper hazardous waste characterization, labeling, storage, disposal, and documentation required. Except as specifically authorized by the government in writing, the lessee and any sublessee must provide, at its own expense, such hazardous waste management facilities, complying with all laws and regulations. Otherwise, government hazardous waste management facilities will not be available to the lessee and any sublessee. Any violation of the requirements of this condition shall be deemed a material breach of the lease.

11. DoD Component hazardous waste accumulation points will not be used by the lessee or any sublessee. Neither will the lessee or sublessee permit its hazardous wastes to be commingled with hazardous waste of the DoD Component.

12. The lessee and any sublessee shall submit to the Army, and maintain thereafter, a plan for responding to hazardous waste, fuel, and other chemical spills prior to commencement of any operations on the leased premises. Such plan shall be independent of SAEP's Spill Contingency Plan and, except for initial fire response and/or spill containment, shall not rely on use of SAEP installation personnel or equipment. Should the government provide any personnel or equipment, whether for initial fire response and/or spill containment, or otherwise on request of the lessee and any sublessee, or because the lessee and any sublessee was not, in the opinion of the said officer, conducting timely cleanup actions, the lessee and any sublessee agrees to reimburse the government for its response costs.

13. The lessee and any sublessee shall not construct, make or permit its sublessee to construct any alterations, additions, or improvements to the leased premises in any way which may adversely affect the cleanup, human health, or the environment without prior written consent of the government.

14. The lessee and any sublessee shall not conduct or permit its sublessee to conduct any subsurface excavation, digging, drilling or other disturbance of the surface or groundwater without prior written approval of the government, with the exception of emergency repair of existing utilities. In particular, the lessee or any sublessee will not access, modify, or otherwise tamper with the well, well head or vault or extract any fluids from the well. Following such an occurrence (emergency repair), SAEP will be immediately notified of such occurrence, before any excavated soil is moved from the location or re-introduced to the sub-surface. SAEP will remain responsible for management of excavated soils to be disposed of off-site.

15. The lessee and any sublessee will notify SAEP of any activity which would involve the cutting, sawing, or breaking of the concrete floor such that solvents, water, or other materials could penetrate the floor or that conversely ground water could seep up through the floor, this includes the placement of wells or sump pumps. The lessee and any sublessee will also notify SAEP of any construction, survey, and/or investigative or monitoring activity which the lessee and any sublessee may conduct outside the leased building(s) which may result in the breaking of the ground cover or ground surface.

16. The lessee and any sublessee is hereby informed and does acknowledge that all buildings on the leased premises, which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint, specifically Building 58.

a. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women.

b. Available information concerning known lead-based paint and/or lead-based paint hazards, the location of lead-based paint and/or lead-based paint hazards, and the condition of painted surfaces is contained in the Draft Environmental Baseline Survey Report, dated July, 1996, which has been provided to the lessee and any sublessee and the Finding of Suitability to Lease (FOSL). No other records or reports pertaining to lead-based paint or lead-based paint hazards are available. All lessees and sublessees must also receive the federally approved pamphlet or lead poisoning prevention. The lessee and any sublessee hereby acknowledges receipt of the information described in this paragraph.

ENCLOSURE 10a

SAEP REQUEST FOR COMMENTS RE: FOSL TO  
USEPA, REGION I AND CTDEP



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY TANK-AUTOMOTIVE AND ARMAMENTS COMMAND  
WARREN, MICHIGAN 48397-5000

13 JAN 1997

REPLY TO  
ATTENTION OF

AMSTA-RM-XS

SUBJECT: Finding of Suitability to Lease for Buildings 65 and 58 at Stratford Army Engine Plant (SAEP)

U.S. Environmental Protection Agency  
Region I  
J. F. K. Federal Building (HBT)  
ATTN: Ms. Meghan Cassidy  
Boston, Massachusetts 02203

Dear Ms. Cassidy,

Enclosed please find the Finding of Suitability to Lease (FOSL) (Attachment A w/enclosures) for the proposed interim lease of Buildings 65 and 58 and one acre of the North parking lot at Stratford Army Engine Plant (SAEP) to the State of Connecticut (Attachment A). The proposed interim lease authorizes the State of Connecticut to sublease this property to Index Corporation, Shelton, Connecticut.

Due to the time sensitive nature of this action, request your office review and provide any comments regarding the FOSL package to the undersigned within 30 days of receipt of this package. If a response is not received within this time period, this office will presume your concurrence.

Please direct any questions to the undersigned at (810) 574-8812 or DSN 786-8812.

Sincerely,

A handwritten signature in black ink, appearing to read "P. W. Szymanski".

PETER W. SZYMANSKI  
Installation Manager  
Stratford Army Engine Plant

Attachment:  
A. FOSL (w/14 enclosures)  
( listed on next page)

AMSTA-RM-XS

**SUBJECT: Report of Availability and Finding of Suitability to Lease for Buildings 65 and 58 at Stratford Army Engine Plant (SAEP)**

(CONT)

- Encl 1. SAEP Site Map
- Encl 2. CTDEP Concur in EBS
- Encl 3. REC
- Encl 4. Notice of Haz. Subst. Releases  
& Spills Chart
- Encl 5. Env'tl Baseline Survey Report Summary
- Encl 5a. CERFA Parcelization Map
- Encl 5b. Notice of Haz. Subst. Releases  
& Spills Chart
- Encl 6. Cultural Resources MOA
- Encl 7a. SAEP Notice Ltr to USFWS
- Encl 7b. USFWS Concur in SAEP Notice Ltr
- Encl 8. Radiation Survey Results
- Encl 9. Lease Environmental Protection Provisions
- Encl 10a. SAEP Request for Comments re: FOSL  
to USEPA, Region I and CTDEP
- Encl 10b. USEPA, Region I and CTDEP Comments  
to FOSL



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY TANK-AUTOMOTIVE AND ARMAMENTS COMMAND  
WARREN, MICHIGAN 48397-5000

13 JAN 1997

REPLY TO  
ATTENTION OF

AMSTA-RM-XS

SUBJECT: Finding of Suitability to Lease for Buildings 65 and 58 at Stratford Army Engine Plant (SAEP)

State of Connecticut  
Department of Environmental Protection  
ATTN: Mr. Kenneth R. Feathers  
79 Elm Street  
Hartford, Connecticut 06106-5127

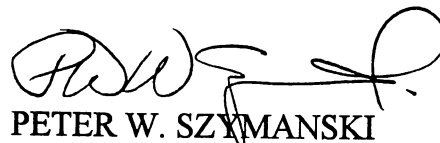
Dear Mr. Feathers,

Enclosed please find the Finding of Suitability to Lease (FOSL) (Attachment A w/enclosures) for the proposed interim lease of Buildings 65 and 58 and one acre of the North parking lot at Stratford Army Engine Plant (SAEP) to the State of Connecticut (Attachment A). The proposed interim lease authorizes the State of Connecticut to sublease this property to Index Corporation, Shelton, Connecticut.

Due to the time sensitive nature of this action, request your office review and provide any comments regarding the FOSL package to the undersigned within 30 days of receipt of this package. If a response is not received within this time period, this office will presume your concurrence.

Please direct any questions to the undersigned at (810) 574-8812 or DSN 786-8812.

Sincerely,

  
PETER W. SZYMANSKI  
Installation Manager  
Stratford Army Engine Plant

Attachment:  
A. FOSL (w/14 enclosures)  
( listed on next page)



AMSTA-RM-XS

SUBJECT: Report of Availability and Finding of Suitability to Lease for Buildings 65 and 58 at Stratford Army Engine Plant (SAEP)

(CONT)

- Encl 1. SAEP Site Map
- Encl 2. CTDEP Concur in EBS
- Encl 3. REC
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- Encl 8. Radiation Survey Results
- Encl 9. Lease Environmental Protection Provisions
- Encl 10a. SAEP Request for Comments re: FOSL  
to USEPA, Region I and CTDEP
- Encl 10b. USEPA, Region I and CTDEP Comments  
to FOSL

ENCLOSURE 10b

USEPA, REGION I AND CTDEP COMMENT TO FOSL

(TO BE PROVIDED UNDER SEPARATE COVER)



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



March 20, 1997

Mr. Craig Cunningham  
AlliedSignal Inc.  
AlliedSignal Engines  
550 Main Street  
Stratford, CT 06497-7593

Dear Mr. Cunningham:

This letter is to document the current status of your existing NPDES permit (CT0002984) while the Department is conducting a technical review of Application No. 199600133 submitted on January 25, 1996.

The permit contained an expiration date of July 10, 1996. Although the renewal application was not submitted within the time provided by the Regulations of Connecticut State Agencies 22a-430-4(b), I have determined that the criteria established in Section 2 of Public Act 93-428 have been met. Accordingly, I hereby authorize the existing permit, No. CT0002984 to continue in effect.

It should be noted that any transfer of this permit must be conducted in accordance with section 22a-430-4(o) of the Regulations of Connecticut State Agencies.

If you have any questions regarding this matter, please contact Christopher Mocciae at #(860)424-3904.

Sincerely,

Arthur J. Rocque, Jr.  
Assistant Commissioner

cc: R. Keith Knauerhase - Roy F. Weston, Inc.