



Connecticut Department of Energy and Environmental Protection



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**



Stratford Army Engine Plant Property, Stratford, Connecticut Stewardship Permit Renewal

Public Informational Meeting

May 12, 2021

Online

CT DEEP, US Army

Agenda

- Welcome from CT DEEP
- Introductions (CT DEEP, US Army, Town of Stratford, US EPA)
- Explanation of Stewardship Permit
- Explanation of Property's Operations History
- Timeline of Investigations and Remediation
- Actions to be Completed Under Renewed Stewardship Permit
- Opportunity for the public to comment or ask questions

Note: All participants will be muted until the meeting is open to public comments and questions. Please note that this portion or all of the meeting may be recorded.

Introductions

Connecticut DEEP

- Ray Frigon, Assistant Division Director, Remediation Division
- **Amanda Killeen**, Project Manager
- Diane Duva, Director, Planning and Support Office

ARMY

- Tony Delano
- Tom Lineer
- Erika Mark

Permit Renewal Overview

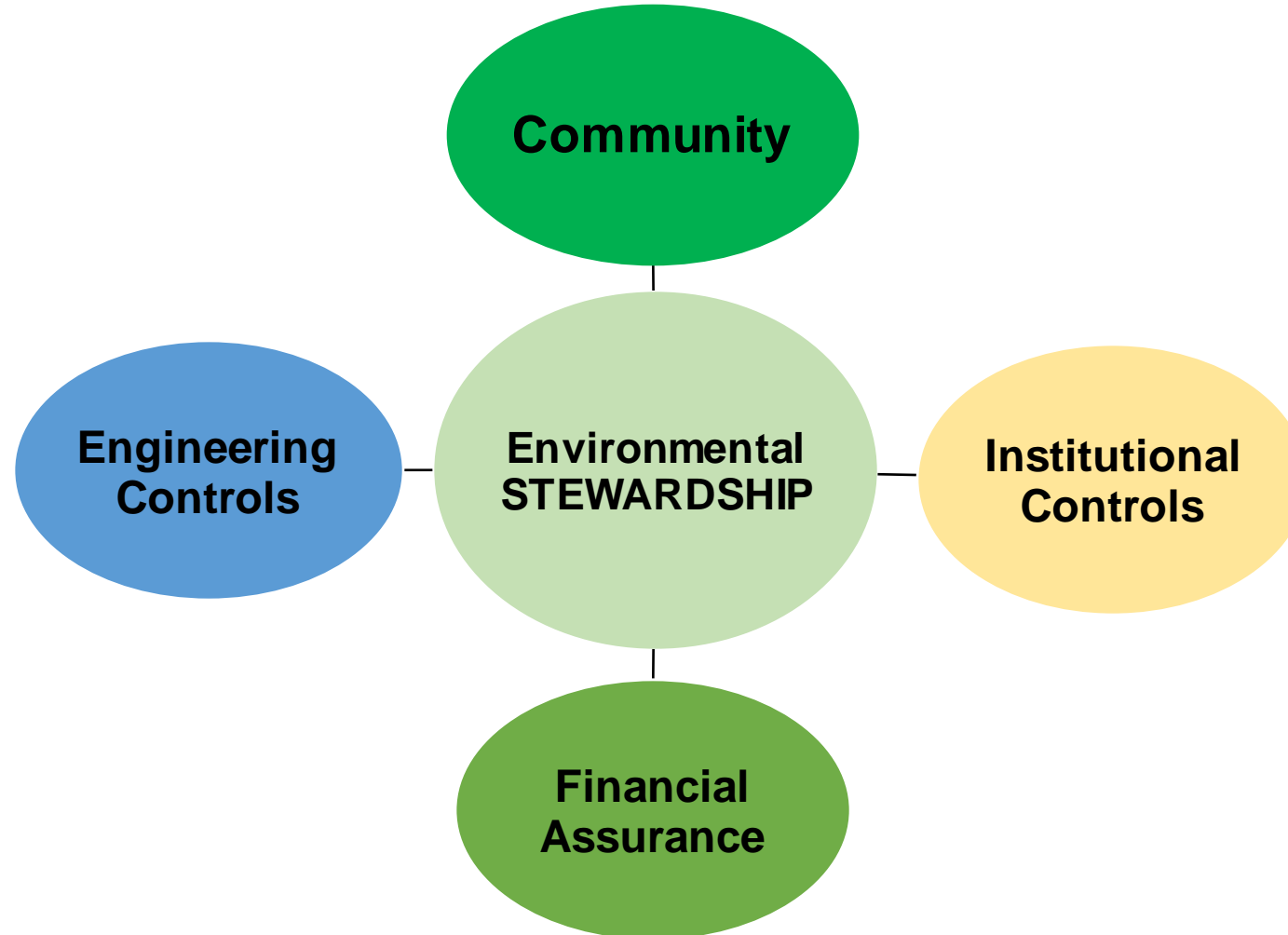
Why we are here

- To continue the property's cleanup progress and
- Set a path for redevelopment of the property

Why is a Stewardship Permit Required?

- Regulatory basis:
- Federal and state laws require that this type of facility has an enforceable cleanup schedule in place to advance site cleanup

CT DEEP Stewardship Permit Links Together the Property and the Community and Ensures Remedies Remain Effective into the Future



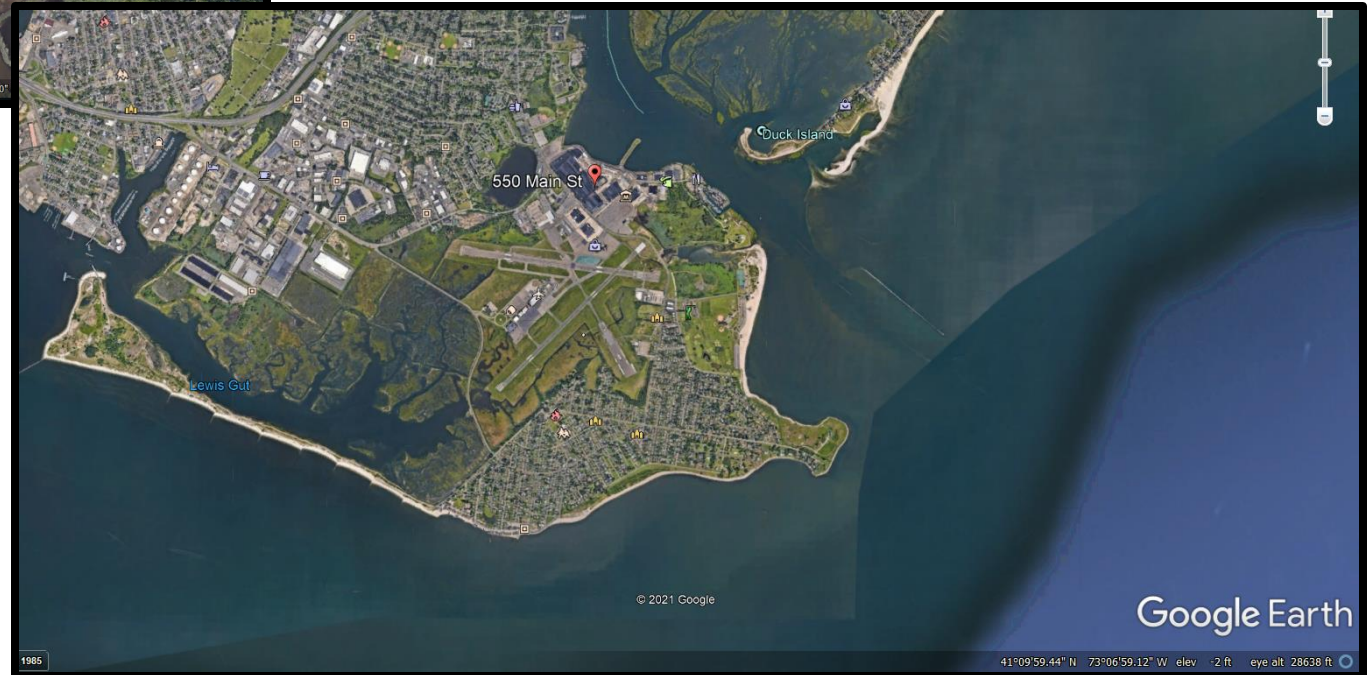


550 Main Street, Stratford, Connecticut, on the coast of Long Island Sound

The site is currently owned by the Army.

The property may be transferred in the future.

Tidal flat cleanup occurring under a separate proceeding.



Photos source: Google Earth Pro
Retrieved March 2021



Facility History

- ▶ The property was developed in 1927 for Sikorsky Aircraft where aircraft and engines were manufactured from 1929 to 1948.
- ▶ The plant was expanded during World War II to accommodate mass production of the F4U Corsair fighter plane.
- ▶ From 1952 until it closed in 1997, the plant produced reciprocating aircraft engines and turbine engines for both commercial and military applications.



Investigations and Remediation

- ▶ All operations ceased in 1997, various site investigations and cleanups have occurred from the 1980s to the present:
 - ▶ Installation Assessment of the SAEP, Oct 1981
 - ▶ Remediation of the jet fuel tank farm, 1989
 - ▶ Preliminary Baseline Survey, Dec 1991
 - ▶ Asbestos Survey Final Report, Apr 1998
 - ▶ Significant Environmental Hazard Reports, Feb 1999
 - ▶ Remediation and construction of the Causeway cover system, 2001
 - ▶ Environmental Condition of Property, Jul 2009
 - ▶ Buildings 7/7a, 8, 33, 34, 18, 71 and water tank demo 2019 to present



Environmental Concerns

- ▶ Chlorinated solvents, fuel, polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), and hexavalent chromium
- ▶ Detected above Connecticut Remediation Standard Regulations (RSRs)



Stewardship Permit – Authorized Activities

- ▶ **RCRA Closure Requirements:**
 - ▶ Prepare and submit a Closure Plan for each Hazardous Waste Management Unit not yet certified closed
 - ▶ Notify CT DEEP Commissioner in writing at least ninety (90) calendar days prior to the date it expects to begin Final Closure of the Hazardous Waste Management Units
 - ▶ Prepare and maintain at the Facility or at an alternate location acceptable to the Commissioner a written estimate of the cost of closing the Hazardous Waste Management Units
 - ▶ Close the Hazardous Waste Management Units in accordance with the Closure Plan
 - ▶ Submit to the Commissioner a certification signed by both the Army and an independent registered professional engineer stating that the Hazardous Waste Management Units, as applicable, have been closed in accordance with the approved Closure Plan



Stewardship Permit – Authorized Activities

▶ **RCRA Post-Closure Requirements:**

- ▶ Post-Closure Care Plan: Perform post-closure care of the land disposal units as specified in the Post-Closure Plan, included in Textron Lycoming's Post-Closure Permit Application received December 17, 1991, until it is superseded by the approval of a revised Post-Closure Plan
- ▶ Revised Post-Closure Care Plan: Prepare and submit for the Commissioner's review and written approval a revised Post-Closure Care Plan for the closed land disposal units, including inspection, maintenance, and monitoring activities
- ▶ Completion of Post-Closure Plan: Submit to the Commissioner by registered mail, a certification signed by both the Army and an independent registered professional engineer stating that the post-closure care period for the land disposal units, was performed in accordance with the specifications in the approved Post-Closure Plan



Stewardship Permit – Authorized Activities

▶ **RCRA Corrective Action Requirements:**

▶ Perform Corrective Action:

- In accordance with the requirements of this permit and approved Remedial Action Plan(s) (“RAPs”)
- Ensure further investigations for each Solid Waste Management Unit (“SWMU”) and Area of Concern (“AOC”) are completed within two (2) years from the date of the issuance of this permit
- Ensure remediation is initiated within three (3) years from the date of initiation of investigation of any SWMU or AOC and completed within ten (10) years of issuance of this permit, or in accordance with an alternative schedule approved in writing by the Commissioner

▶ Schedule/Scope of Work: Submit schedule(s)/scope(s) of work for the investigation and remediation of releases of hazardous waste and hazardous substances at or from the Facility such that the remediation will achieve compliance with CT DEEP Remediation Standard Regulations (RSRs)



Stewardship Permit – Authorized Activities

▶ **RCRA Corrective Action Requirements:**

- ▶ Remedial Action Plan (“RAP”): Prepare and submit for the Commissioner’s review and written approval one or more RAP(s), developed in accordance with Condition No. II.B.2. of this permit and RCSA Sections 22a-449(c)-104(a)(1) and 22a-133k-1 et. seq. (Remediation Standard Regulations), incorporating 40 CFR 265 Subpart G, which details the steps to be taken to perform corrective action, including:
 - Remedial actions, including evaluation of remedial alternatives and selection of preferred remedy
 - Adaptive re-use of buildings
 - Demolition of existing buildings/structures
 - Permitting requirements
 - Implementation schedule



Stewardship Permit – Authorized Activities

▶ **RCRA Corrective Action Requirements:**

▶ Implementation of Remedial Action:

- Perform remediation activities for soil, sediment, groundwater and surface water pollution in accordance with the approved RAP(s)
- Notify the Commissioner in writing at least ninety (90) calendar days prior to the date it expects to complete the active remedial activity(ies)

▶ Completion of Post-Remediation Monitoring:

- Notify the Commissioner in writing at least ninety (90) calendar days prior to the date it expects to complete post-remediation groundwater monitoring and monitored natural attenuation
- Commissioner issues Certificate of Completion once corrective actions completed



Summary: Stewardship Permit

- Ensures public participation in proposed cleanup
- Documents the completion of cleanup
- Memorializes phases of completed remediation
- Addresses financial assurance obligations
- Spells out long-term obligations of permit holder:
 - to simplify transfer of property and
 - to ensure remedies remain effective into the future.

CT DEEP Stewardship Permit Public Comment Period

Opportunity to Comment on Draft Permit Renewal

- April 8, 2021-Draft permit made available for public review
 - Notice of tentative determination to issue a permit renewal was published, beginning the Public Comment period
 - Information published in CT Post on April 8, 2021
 - Radio announcements on WICC 600 AM
- May 12, 2021-Public Informational Meeting
- **May 21, 2021 = End of Public Comment period**

Public Comment Process

- Once all written comments are received, CT DEEP will review the comments received in writing and verbally at this meeting prior to finalizing the decision regarding the permit renewal.
- This presentation will be posted:
<https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits/Stratford-Army-Engine-Plant>

Questions and Comments Welcome

Please note that this portion or all of the meeting may be recorded.

- If you wish to speak, please use the “Raise your hand” feature
- The moderator will call your name
- Unmute your phone / computer
- If possible, turn your camera on while making a comment
- State your name and address clearly
- When done, please place your phone / computer back on mute

Thank you!

Public Comments Welcome

Thank you for participating!

Please send written comments by email or mail to:

Email:

Amanda.Killeen@ct.gov with copy to:

DEEP.REMStewardship@ct.gov

Mail:

Amanda Killeen, Environmental Analyst III

Remediation Division

Bureau of Water Protection and Land Reuse, 2nd Floor

CT Department of Energy and Environmental Protection

79 Elm Street, Hartford CT 06106-5127

All comments must be received by May 21, 2021