

RESPONSE TO USEPA INFORMATION REQUEST DATED MAY 3, 2017

Respondent AVCO Corporation, a subsidiary of Textron Inc., hereby responds to the information request from U.S. EPA dated May 3, 2017. The information request relates to AVCO's former Textron Lycoming Turbine Engine Division. It is AVCO's understanding that it is alleged to have sent sludge to the Operable Unit 9 of the Raymark Industries Superfund Site ("Site") from 1957 to 1968 and that such sludge contained hazardous substances. It is Respondent's understanding that the Site ceased operations by approximately 1970. To the extent this request seeks information beyond that date, Respondent objects to such on the grounds that it is overbroad, unduly burdensome, and unlikely to lead to the production of relevant information.

The Lycoming Turbine Engine Division was sold in 1994 to Allied Signal, now Honeywell, along with the Division's business' records. Employees also went along with the sale. At this date, over twenty years from the sale, and almost fifty years after the alleged shipments at issue, Respondent has limited, material information.

1. a. AVCO Corporation, 40 Westminster St., Providence, RI 02903  
b. Jamieson Schiff, Executive Counsel, Textron Inc., 40 Westminster St., Providence, RI 02903  
401-457-2422 [jschiff@textron.com](mailto:jschiff@textron.com)  
c. Jamieson Schiff, Textron Inc., 40 Westminster St., Providence, RI 02903 401-457-2422  
[jschiff@textron.com](mailto:jschiff@textron.com)
2. a. Respondent was originally incorporated as The Aviation Corporation. In 1932 its Cord Corporation subsidiary acquired Lycoming Manufacturing. In 1935 Lycoming became a subsidiary of The Aviation Manufacturing Corporation, which was a subsidiary of The Aviation Corporation. In 1947 The Aviation Corporation changed its name to Avco Manufacturing Corporation. In 1949 Lycoming became part of the Lycoming-Spencer Division of Avco Manufacturing Corporation. The Spencer business was later sold and the division renamed AVCO Lycoming Division. In 1951 the Stratford operations was established and was called Lycoming Bridgeport. In 1959 the name of Avco Manufacturing Corporation was changed to AVCO Corporation. In 1963 AVCO Lycoming Division was separated into the Lycoming Williamsport and Lycoming Stratford Divisions. The Stratford operation took the name AVCO Lycoming Turbine Engine Division of AVCO Corporation until 1985 when Textron Inc. acquired AVCO Corporation and the name was changed to Textron Lycoming Turbine Engine Division of AVCO Corporation 1985, which it remained until 1994  
b. i. March 1, 1929  
i. Delaware  
iii. The Corporation Trust Company  
iv- v. For current officers and directors see attachment.  
vi. Textron Inc. (owns 100% of AVCO stock)

vii-ix. Up until 1985 Respondent was a publicly traded company. In 1985, it became a subsidiary of Textron Inc.

c-d. Not applicable

e. See responses to 2.a. and 2.f.

f. Respondent was originally incorporated as The Aviation Corporation. In 1932 its Cord Corporation subsidiary acquired Lycoming Manufacturing. In 1935 Lycoming became a subsidiary of The Aviation Manufacturing Corporation, a subsidiary of The Aviation Corporation. 1947 The Aviation Corporation changed its name to Avco Manufacturing Corporation. In 1949 Lycoming became part of the Lycoming-Spencer Division of Avco Manufacturing Corporation. The Spencer business was later sold and the division renamed AVCO Lycoming Division. In 1951 the Stratford operation was established and referred to as Lycoming Bridgeport. In 1959 the name of Avco Manufacturing Corporation was changed to AVCO Corporation. In 1963 AVCO Lycoming Division was separated into the Lycoming Williamsport and Lycoming Stratford Divisions.

g. Not applicable

h. In 1985, AVCO Corporation became a subsidiary of Textron Inc. through acquisition of AVCO's publicly traded stock.

i. Not applicable

3. Respondent objects to this request to the extent it requests information of Respondents' operations within 60 miles of the Site that were not part of the Lycoming Division on the grounds that it is overbroad, unduly burdensome and not likely to lead to the production of relevant information. Without waiving its objection, to Respondent's knowledge Respondent's Avco Advanced Development Division had operations located in Stratford during the 1950s.

a. 550 South Main St. was the address of Lycoming's manufacturing facility, what became known as the Stratford Army Engine Plant (SAEP). Additionally, Lycoming operated at two locations at the Sikorsky Memorial Airport across the street from the SAEP. Respondent does not know the street addresses of these operations. The Airport's address is 1000 Great Meadow Rd. Stratford but Respondent does not know whether Respondent's operations there had a different address. Nor does Respondent know the address of Avco Advanced Development Division.

b. Respondent operated the SAEP from 1951-1994. (That facility had previously been operated by Sikorsky and Vought Aircraft, both of which conducted aviation related manufacturing there). In 1951 Lycoming was established at the SAEP owned by the Department of Defense to build R-1820 engines for the U.S. Air Force. In 1976 the plant was transferred from the Air Force to the Army and renamed the Stratford Army Engine Plant (SAEP). The facility then produced engines for the Abrams tank program. Operations reportedly included machining, metal finishing, painting, cleaning and testing of 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.

The time period by which Respondent operated at the Sikorsky Memorial Airport is unknown. One operation was a fixed base operation, and provided fueling, hangar space, and maintenance services. The other facility is believed to have performed component repair and light manufacturing.

Avco Advanced Development Division was engaged in research and development in the areas of propulsion, energy, and electronics.

- c. See the response to b. above.
- d. Respondent designed, manufactured, repaired and serviced engines for the aviation industry until 1976 and for the Abrams tank subsequent to that time.
- e. Respondent used oils, fuels, solvents, paint, and metal finishing chemicals.
- f. Respondent used solvents to clean equipment. It does not know the volume used.
- g. Respondent is not aware of any spills during the period under investigation.

4. a. Respondent does not have this information for the period being investigated

- b. Respondent does not have this information for the period being investigated
- c. Respondent does not have this information for the period being investigated
- d. Respondent does not have this information for the period being investigated

5 a. Respondent does not have any information indicating that its waste was disposed of at the Site.

- b. Respondent does not have any information indicating that its waste was disposed of at the Site.
- c. Respondent has no information to indicate that its waste was taken to the Site.
- d. Respondent has no information to indicate that its waste was taken to the Site.
- e. Respondent does not have any information indicating that its waste was disposed of at the Site.
- f. Respondent does not have any information indicating that its waste was disposed of at the Site.
- g. Respondent does not have any information indicating that its waste was disposed of at the Site.
- h. Respondent does not have any information indicating that its waste was disposed of at the Site.
- i. Respondent does not have any information indicating that its waste was disposed of at the Site.
- j. Respondent does not have any information indicating that its waste was disposed of at the Site.
- k. Respondent does not have any information indicating that its waste was disposed of at the Site.

I. Respondent does not have any information indicating that its waste was disposed of at the Site.

6. a. CTD001181502

b. EPA RCRA

c. 1980-1985

d. CTDEP Division of Water and Division of Air

e. 1980-1985

7. None known

8. Robert Dennis, retired, former director of facilities for Textron Lycoming

Ronald Newcomb, retired, former vice president of operations for Textron Lycoming

Daniel Beeman, retired, former project engineer for Textron Lycoming

James Runstadler, former environmental manager for Textron Lycoming, currently President Textron Innovations

Lawrence O'Connell, former in-house counsel for Textron Lycoming, currently Vice President and General Counsel, Textron Industrial Products,

Ann Willaman, Assistant Secretary for AVCO Corporation

Documents reviewed included paper files of Textron Lycoming Turbine Engines, located in the Textron corporate environmental, health and safety files. A request has also been made to Honeywell International, Inc., which purchased the Textron Lycoming Turbine Engines business (including its business records), for potentially relevant files. That request is still pending.

**Officers****View:** Current Officers

Officer 1 - 13 of 13

Open Admin Officer Record	Open Contact Record	Title	Date First Elected	Date Last Elected	End Date
Canfield, Gregory is Officer of AVCO Corporation	Canfield, Gregory	Assistant Secretary	11/1/16	5/1/17	
Cournoyer, James C is Officer of AVCO Corporation	Cournoyer, James C	Assistant Treasurer	3/7/11	5/1/17	
Dawes, David is Officer of AVCO Corporation	Dawes, David	Assistant Secretary	3/7/11	5/1/17	
Hanlon, Daniel D is Officer of AVCO Corporation	Hanlon, Daniel D	Senior Vice President - Human Resources	7/10/12	5/1/17	
Kackley, Todd is Officer of AVCO Corporation	Kackley, Todd	Chief Information Officer	5/11/15	5/1/17	
Kraft, Michael is Officer of AVCO Corporation	Kraft, Michael	Assistant Secretary and General Manager	8/27/09	5/1/17	
Lee, Danny is Officer of AVCO Corporation	Lee, Danny	Senior Vice President - Legal and Contracts, and Secretary	1/1/13	5/1/17	
Lord, Ellen M is Officer of AVCO Corporation	Lord, Ellen M	President and Chief Executive Officer	12/11/12	5/1/17	
Potocki, Jennifer H is Officer of AVCO Corporation	Potocki, Jennifer H	Assistant Treasurer	3/1/17	5/1/17	
Sader, Courtney is Officer of AVCO Corporation	Sader, Courtney	Assistant Secretary	5/31/16	5/1/17	
Sutton, Michael J is Officer of AVCO Corporation	Sutton, Michael J	Assistant Treasurer	6/18/16	5/1/17	
Tarallo, James is Officer of AVCO Corporation	Tarallo, James	Senior Vice President, Chief Financial Officer and Treasurer	3/24/17	5/1/17	
Willaman, Ann T is Officer of AVCO Corporation	Willaman, Ann T	Assistant Secretary	6/26/00	5/1/17	

**Directors****View:** Current Directors

Director 1 - 3 of 3

Open Director Record	Open Contact Record	Title	Date First Elected	Date Last Elected	End Date
Lee, Danny is Director of AVCO Corporation	Lee, Danny	Director	1/1/13	5/1/17	
Lord, Ellen M is Director of AVCO Corporation	Lord, Ellen M	Director	10/29/12	5/1/17	
Tarallo, James is Director of AVCO Corporation	Tarallo, James	Director	3/24/17	5/1/17	