

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



CONDITIONAL APPROVAL

April 23, 2004

Curt M. Richards
Vice President
Olin Corporation
P.O. Box 248
Charleston, TN 37310

RE: Supplemental Investigation Work Plan
Non-Public Properties Study Area
Hamden, Connecticut
Consent Order No. SRD-128

Dear Mr. Richards:

The Remediation Section of the Department of Environmental Protection has reviewed the Work Plan titled, "Supplemental Investigation Work Plan, Non-Public Properties Study Area, Hamden, Connecticut", revised January 2004, prepared for Olin Corporation by Malcolm Pirnie, Inc. and received on January 7, 2004, and the "Supplemental Investigation Quality Assurance Project Plan, Non-Public Properties Study Area, Hamden, Connecticut", dated January 2004, prepared for Olin Corporation by Malcolm Pirnie, Inc. and received on January 30, 2004 (collectively referred to as the "Work Plan"). The Work Plan was submitted pursuant to paragraph B.3.b of Consent Order No. SRD-128, issued on April 16, 2003.

The Work Plan proposes soil and ground water investigations to be completed at the Non-Public Properties portion of the Newhall Street Neighborhood site in Hamden.

The Work Plan is hereby approved under the following conditions:

1. **Substances of Concern.** Polychlorinated dibenzodioxins and polychlorinated dibenzofurans must be analyzed in any soil or fill sample for which chlorinated solvents, pesticides or polychlorinated biphenyls (PCBs) are detected. Asbestos must be analyzed in any sample collected from waste that contains demolition debris. Analysis for metals must include selenium and silver as substances of concern. Soil and fill samples must be analyzed for volatile organic compounds by EPA Methods 5035/8260 when field screening using the photoionization detector indicates readings above background. For samples collected as part of the Isolated Fill Assessment, the complete list of semivolatile organic compounds, including polynuclear aromatic hydrocarbons, must be analyzed.

2. Contiguous Fill Assessment, Extent Delineation. The Work Plan proposes to collect samples of native, undisturbed soil at each of the 115 planned transects from the depth at which fill pinched out at the adjacent sample point. Each of these 115 native soil samples must be field screened using X-ray fluorescence to assess the presence of metals of concern attributable to the fill, in addition to the proposed laboratory analysis of 38 of the 115 transect soil samples.
3. Monitoring Well Installation and Groundwater Sampling. Vertical elevations must be surveyed to the Town of Hamden vertical datum of high sea level as opposed to the WGS 1984 HAE datum previously requested by the Department.
4. Reporting. A summary letter describing investigation findings and copies of all field screening data and laboratory analytical reports for each property must be provided to individual property owners within 30 days of completion of sample validation. The Department must be notified immediately if surface soil samples analyzed as part of the Bare Spot Characterization have lead concentrations exceeding 1,200 milligrams per kilogram (mg/kg), arsenic concentrations exceeding 150 mg/kg, or benzo(a)pyrene concentrations exceeding 10 mg/kg.
5. Quality Assurance Project Plan. The Quality Assurance Project Plan must be revised to reflect analytical reporting limits for all compounds, including antimony, arsenic, thallium, and PCBs, are less than the applicable remediation standards for those compounds
6. Proof of Insurance. Olin or its consultant must provide a certificate of Comprehensive General Liability insurance to all property owners where investigation is being proposed prior to initiating investigation activities on each property.

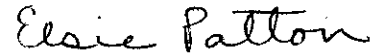
Nothing in this approval shall affect the Commissioner's Authority to institute any proceeding, or take any other action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the approved actions have not fully characterized the extent and degree of pollution, the Commissioner may institute any proceeding, or take any action to require further investigation. This approval relates only to pollution or contamination identified in the above referenced plan.

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

No provision of this approval and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken pursuant to this approval will result in compliance or provide a potable water supply.

If you have any questions pertaining to this matter, please contact Shannon W. Pociu of my staff at (860) 424-3546.

Sincerely,



Elsie Patton
Acting Director
Remediation Section
Bureau of Waste Management

EP:SWP

cc: Raymond Horn, Olin
Kenneth E. Cichon, Malcolm Pirnie, Inc.
Douglas Cohen, Brown Rudnick Berlack Israels LLP
Mayor Carl Amento, Town of Hamden
David Silverstone, Regional Water Authority
John M. Looney, AAG
Shannon Pociu, DEP
Terry Iacone, DEP
Meg Harvey, DPH
Elizabeth Hayes, Community Advocate

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