

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

November 12, 2009



CONDITIONAL APPROVAL

David M. Share
Director, Environmental Remediation
Olin Corporation
3855 North Ocoee Street, Suite 200
Cleveland, TN 37312

RE: Final Construction Work Plan
Non-Public Properties
Newhall Street Neighborhood Site (SRD-128)

Dear Mr. Share:

The Remediation Division of the Bureau of Water Protection and Land Reuse (the Department) has reviewed the plan from Olin Corporation dated August 2009, titled "Final Construction Work Plan, Non-Public Properties, Newhall Street Neighborhood Site", and the accompanying letter report dated August 19, 2009, titled "Response to CTDEP Comments Dated July 20, 2009 and CT DPH Comments Dated July 30, 2009". The plan was prepared by Severson Environmental Services and the letter report was prepared by MACTEC on behalf of Olin Corporation and in conjunction with Consent Order SRD-128, and the Department's October 6, 2008 Conditional Approval of the Generic Remedial Action Plan.

The plan presents the general sequence and procedures for pre-remedial and remedial construction activities for the non-public properties within the Newhall Street Neighborhood site. More specifically, the plan describes: actions that will be taken to mobilize equipment and personnel to the site; actions necessary to prepare the site for excavation of waste fill (such as surveying, clearing and grubbing); the process of excavation, transportation and disposal of waste fill; and backfilling and restoration activities.

The letter report provides responses to comments and questions presented by the Department, and the Department of Public Health, on Olin's ten draft plans for implementing the approved remedial action plan.

The above referenced Final Construction Work Plan and letter report are hereby approved with the following conditions: 1. Prior to backfilling, a visible warning/marker barrier be placed over waste fill located deeper than 4 feet below ground surface; 2. The names and locations of borrow sources, as well as laboratory testing data and certification, must be submitted to the Department prior to use; 3. Soil from borrow sources must be clean, in that it meets the Remediation Standard Regulations (RSRs) and risk levels for the site, and must be generally consistent with background soil levels, and must not contain hazardous substances from a prior release regardless of whether concentrations meet the RSRs; 4. Top soil must be capable of supporting vegetative growth.

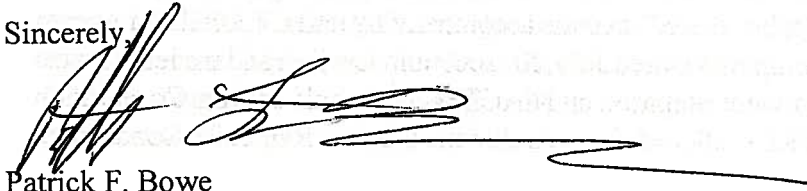
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Nothing in this conditional approval shall affect the Commissioner's authority to institute any proceeding, or take any action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law. If at any time the Commissioner determines that the approved actions 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. This conditional approval relates only to pollution or contamination identified in the above referenced plan.

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

If you have any questions pertaining to this conditional approval, please contact Raymond Frigon, Jr. of my staff at (860) 424-3797.

Sincerely,



Patrick F. Bowe
Director
Remediation Division
Bureau of Water Protection and Land Reuse

PFB:rlf

c: Robert Bell, CT DEP
Raymond Frigon, CT DEP
Carrie Hunt, Olin Corporation
Jimmy Young, Olin Corporation
Alan Elia, Severson Environmental Services
Nelson Walter, MACTEC
Mayor Craig Henrici, Town of Hamden
Chris Harriman, Haley & Aldrich, Inc.
Larry Bingaman, Regional Water Authority
Michael Manolakas, Leggette Brashears & Graham, Inc.
John Albrecht, AECOM
Jill Barrett, Fitzgerald & Halliday, Inc.

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