



**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 Transportation and Consolidation Plan
Hamden 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 Transportation and Consolidation 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 identifies the materials and wastes associated with remedy implementation at the non-public properties within the Newhall Street Neighborhood site, and the regulatory requirements for managing those materials and wastes. The plan also includes the procedures to be followed during the segregation, transportation, and potential reuse/off-site disposal of the remediation derived material and waste.

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 Transportation and Consolidation Plan and letter report are hereby approved, with the exception of the truck routes to transport material from the site as shown in appendix B of the Plan, and the duration that stockpiled contaminated soil may remain on-site. The Town of Hamden's Traffic Safety Office must approve the proposed truck traffic route. Further, the duration that stockpiled contaminated soil may remain on-site must be consistent with the Olin's General Permit for Contaminated Soil and/or Sediment Management application No. 200903078, Registration No. DEP/CSST-062-12-115 issued September 14, 2009.

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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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