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September 28, 2009

Mr. Raymond Frigon  
Department of Environmental Protection  
Bureau of Waste Management  
Permitting, Enforcement and Remediation Division  
79 Elm Street  
Hartford, CT 06106-5127

VIA E-MAIL AND US MAIL

Subject: Quarterly Progress Report – 3rd Quarter 2009  
SRD-128, Non-Public Properties  
Hamden, CT

Dear Mr. Frigon,

This Progress Report is submitted in compliance with the requirements of Consent Order SRD-128, dated April 16, 2003, Section 5, Progress Reports.

I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.

If you have any questions, please call me at 423-336-4540.

Sincerely,

OLIN CORPORATION

A handwritten signature in dark ink, appearing to read 'David M. Share', written over a horizontal line.

David M. Share  
Director, Environmental Remediation

Attachment

cc: Newhall Remediation Project Distribution List

**QUARTERLY PROGRESS REPORT OF OLIN CORPORATION  
NON-PUBLIC PROPERTIES  
HAMDEN, CONNECTICUT**

**REPORT PERIOD:** July 1, 2009 through September 30, 2009

**REPORT DATE:** September 30, 2009

**PROGRESS MADE THIS REPORTING PERIOD:**

- Olin submitted Block J Property-Specific RAPs on August 6, 2009.
- Olin conducted landscape property inventories in September 2009 on 14 properties in Block A, which completed the inventories for all 15 Block A properties requiring remediation.
- Olin scheduled and conducted meetings with property owners to discuss Property-Specific RAPs for twenty-four properties in Blocks J, N, R, and S.
- Olin sent letters to CTDEP referring 13 properties for which Olin has exercised best efforts to obtain access to the Property.
- Olin submitted a memorandum titled TCLP Characterization – Statistical Analysis of May 2009 Sampling Results, which summarizes the preliminary findings of the 40 TCLP samples collected in May 2009.
- Olin submitted the Evaluation of Fill TCLP Lead Data for Blocks N, R, and S on August 19, 2009. Olin received approval from CTDEP for Blocks N, R, and S fill disposal at the Tire Pond on August 27, 2009.
- Olin conducted additional TCLP characterization sampling at the site on September 9, September 28, and September 29, 2009.
- Olin submitted individual letter reports to 23 property owners on July 23, 2009 regarding the additional investigations conducted on their properties since July 2008.
- Olin submitted the Final Additional Investigations Report for 23 properties on September 1, 2009.
- Olin submitted the Draft Temporary Relocation Policy Manual on August 20, 2009.
- Olin submitted the Evaluation of Fill Compliance with RSR Criteria for the Non-Public Properties memorandum to CTDEP on August 21, 2009.
- Olin submitted permit applications to the CTDEP for the NPP site on August 17, 2009, and for the Tire Pond on August 27, 2009.
- Olin submitted revised construction plans and a response to DEP and DPH comments on the plans on August 19, 2009.
- Olin participated in several meetings/conference calls with DEP relative to the implementation of the NPP remedy.

**ISSUES ENCOUNTERED THIS REPORTING PERIOD:**

- The unresponsiveness of property owners, and direct refusal to meet to discuss Property-Specific RAPs led to referral of 13 properties to CTDEP during the reporting period.
- No response from the Town of Hamden to formalize the Mill Rock Park staging area for

construction work and access to Hamden Middle School property to minimize disruption of the owners and the public during remediation of Block A.

**ACTIVITIES PLANNED FOR NEXT PERIOD:**

- Continue to inventory property landscape features as necessary, and develop Property-Specific RAPs.
- Meet with property owners to discuss Property-Specific RAPs and relocation, as appropriate.
- Submit Property-Specific RAPs for the next group of Blocks planned for remediation.
- Continue work associated with the characterization and disposition of excavated fill.
  - Continue work on obtaining access agreements for TCLP sampling.
  - Collect additional fill samples from the fill within the NPP for TCLP lead analyses.
- Submit additional letters to CTDEP referring properties for which Olin has exercised best efforts to obtain access, as necessary.
- Participate in Public Participation Meetings as scheduled by the Agency, as appropriate.
- Attend meetings and conference calls with DEP as appropriate.