



3855 North Ocoee Street, Suite 200  
Cleveland, TN 37312  
(423) 336-4540 FAX: (423) 336-4166

December 18, 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 – 4<sup>th</sup> 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 black ink, appearing to read "David M. Share".

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:** Fourth Quarter of 2009

**REPORT DATE:** December 18, 2009

**PROGRESS MADE THIS REPORTING PERIOD:**

- Block H Property-Specific Remedial Action Plans (RAPs) were submitted to the Connecticut Department of Environmental Protection (CTDEP) on November 4, 2009 for 17 of the 21 properties requiring remediation. The remaining four properties were previously referred to CTDEP following completion of best efforts to obtain access.
- Landscape property inventories were completed in November 2009 for 12 out of 19 properties requiring remediation in Block K.
- Meetings with property owners to discuss Property-Specific RAPs were scheduled and conducted for twenty-one properties in Blocks H, J, N, R, and S.
- Three properties were referred to the CTDEP for which best efforts to obtain access had been completed.
- Correspondence was submitted indicating 211-213 Goodrich Street should be removed from the category "Referred to CTDEP" as the property owner agreed to and executed their Property-Specific RAP and Restoration Access Agreement.
- Responses to CTDEP comments on the Final Perimeter Air Monitoring Plan and Quality Assurance Project Plan were submitted.
- 46 additional TCLP characterization fill samples were collected at the site between October 14 and October 15, 2009. Based upon analytical results, a TCLP Characterization memorandum was submitted to the CTDEP on December 15, 2009.
- Responses are being developed to address CTDEP comments received November 25, 2009 on the Draft Temporary Relocation Policy Manual.
- We participated in several meetings/conference calls with DEP relative to the status of the NPP remedy.
- We met with the Town of Hamden and CTDEP on December 3, 2009 to discuss construction staging areas, town permit requirements, proposed truck route, and progress on establishment of the Local Design District.

**ISSUES ENCOUNTERED THIS REPORTING PERIOD:**

- The unresponsiveness of a small faction of property owners, and direct refusal to meet to discuss Property-Specific RAPs led to referral of 3 properties to CTDEP during the reporting period.
- Town of Hamden is reluctant to finalize access for staging at Mill Rock Park or Rochford Field. The Town has requested that an alternate staging area be evaluated. This issue could delay the project if access to a comparable staging area is not finalized within the previously communicated deadline.
- The Evaluation of Fill Compliance with RSR Criteria process has not been concluded as of yet. This issue could delay the project.

**ACTIVITIES PLANNED FOR NEXT PERIOD:**

- Develop and submit Property-Specific RAPs for Block A.
- Meet with property owners to discuss Property-Specific RAPs and relocation, as appropriate.
- Attend meetings and conference calls with DEP as appropriate and necessary.
- Monitor and maintain schedules for initiating contractor mobilization and field work as necessary based upon progress made by all parties on critical path project activities.



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**ACTIVITIES PLANNED FOR NEXT PERIOD:**

- Develop and submit Property-Specific RAPs for Block A.
- Meet with property owners to discuss Property-Specific RAPs and relocation, as appropriate.
- Attend meetings and conference calls with DEP as appropriate and necessary.
- Monitor and maintain schedules for initiating contractor mobilization and field work as necessary based upon progress made by all parties on critical path project activities.