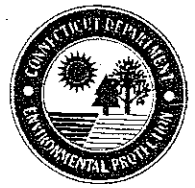


STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



January 28, 2005

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

RE: Supplemental Investigation  
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 your letter of January 12, 2005 requesting the Department's assistance in obtaining outstanding property access agreements in the Non-Public Properties study area. The letter included a list of 16 properties where Olin has not obtained access and a brief summary of the efforts Olin has made to contact the property owner. Earlier this week, Mr. James Young of your staff informed Ms. Shannon Pociu of the Department that access had been obtained at 339 Augur Street, reducing the total to 15 outstanding properties. Olin made this request pursuant to Paragraph B.18 of Consent Order No. SRD-128.

It is clear from your letter that Olin made a significant effort to obtain access to the properties for which some type of testing is required. However, your letter and table did not provide any information about whether you were successful in speaking to the owners and, if so, what the natures of the property owners' concerns were. Although we understand that four property owners refused access, please provide us with additional information on your conversations with all of the 15 property owners and please provide copies of any written correspondence from the property owners to Olin.

In light of the preliminary results of the testing program, the Department has reviewed the data that Olin has collected in the vicinity of these 15 properties to evaluate how critical the data originally proposed for these properties are to the objectives of the investigation. At least half of the properties on the list are located well within the boundaries of known fill areas where sufficient sampling has been completed to determine the extent and characteristics of the fill. The investigation you had proposed for those properties involved evaluating ground surface conditions. In addition, the Department has already approved an alternative location for the one property for which a monitoring well was proposed. Therefore, data from such properties are not necessary for Olin to complete its investigation of the extent and physical and chemical nature of fill materials and

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the extent and degree of soil, surface water and groundwater pollution resulting from the placement of fill on the non-public properties. At only three properties is it necessary for Olin to obtain data from these properties to determine the extent of fill. Those properties are: 163 Shepard Street, 214 Morse Street, and 610 Newhall Street. Therefore, the Department will make every effort to obtain or compel access at those properties as soon possible. Depending on the findings of the supplemental phase of the Isolated Fill Investigation that is on going, the Department will evaluate the need to obtain or compel access at other properties. In particular, the Department will evaluate results of sampling in the vicinity of 160-162 Shepard Street, 79 Marlboro Street, and 9 Remington Street.

Your letter states that "Olin has had to make changes to the supplemental investigation schedule principally involving completion of the groundwater monitoring well system and all subsequent tasks which are contingent upon the completion of the well system." However, your request for a delay in schedule was disapproved on December 28, 2004. Please be advised that, even if access cannot be obtained to the properties you have identified on your list, Olin will have sufficient data to submit the Supplemental Investigation Report by March 23, 2005. If Olin obtains or DEP compels access to the outstanding properties after the submission of the Supplemental Investigation Report, Olin can submit an addendum to the Supplemental Investigation Report that includes data collected from properties where access was obtained after March 23, 2005.

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  
Planning and Standards Division  
Bureau of Waste Management

EP:SWP

cc: Raymond Horn, Olin  
Kenneth E. Cichon, Malcolm Pirnie, Inc.  
Harold Moritz, 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  
Kevin Hood, ERI

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