



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



August 27, 2009

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

**Subject: Concurrence with TCLP Lead Data Review for Blocks N, R, and S
Evaluation of Material for Placement at the "Tire Pond" Landfill
Non-Public Properties, Newhall Street Neighborhood
Hamden, Connecticut**

Dear Mr. Share:

Staff of the Waste Engineering and Enforcement Division ('the Department') have reviewed the letter report entitled "Evaluation of Fill TCLP Lead Data for Blocks N, R, and S, Non-Public Properties, Newhall Street Neighborhood, Hamden, Connecticut," dated August 19, 2009. The letter report was prepared and submitted by Mactec Engineering and Consulting, Inc. ('MACTEC') on behalf of Olin Corporation. The letter report includes an evaluation that compares TCLP lead data obtained from five samples of soil collected from residential properties within Blocks N, R, and S, of the Newhall Street Neighborhood to numeric criteria of the Tire Pond Material Acceptability Protocol, dated March 14, 2007.

The Material Acceptability Protocol details the analytical specifications that must be used when determining the acceptability of soil and sediment proposed for use in closing the Tire Pond landfill. On February 14, 2009, MACTEC submitted a letter report to the Department entitled "Evaluation of Fill for Placement at the Tire Pond Landfill." That letter report presented the results of a project-wide comparison of Non-Public Property fill data from 0-4 feet below ground surface to the chemical criteria of the Material Acceptability Protocol. That letter report concluded that the application of statistical methodology (utilizing upper confidence limits) combined with a recognition and omission of data from two specific outlier areas of the project site (located in Block F) containing fill with elevated analyte concentrations achieves compliance with the mass analysis component of the Material Acceptability Protocol (the Department concurred with this conclusion in a letter issued to Olin on June 19, 2008). MACTEC's February 2009 letter report also states that compliance with the Material Acceptability Protocol TCLP trigger level for lead would be addressed separately.

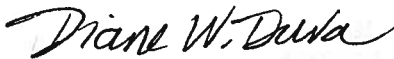
The August 19, 2009 letter report includes an evaluation that compares TCLP lead data obtained from samples of soil collected from residential properties within Blocks N, R, and S, of the Newhall Street Neighborhood to the numeric criteria of the Tire Pond Material Acceptability Protocol. Five samples (one each from Blocks N and R and three from Block S) representing an estimated 2,861 cubic yards of soil were collected from soil borings that were advanced within the limits of the subject Blocks and analyzed for TCLP lead. The letter report concludes that the five samples contained TCLP lead in concentrations below the maximum allowable concentration of the Material Acceptability Protocol (5.0 mg/L). The

letter report also concludes that the minimum sampling frequency requirement of 1 sample per 1,000 cubic yards of material has been met per the requirements of the Material Acceptability Protocol.

The Department concurs with the conclusions presented in the August 19, 2009 letter report and the recommendation for the reuse of soil from Blocks N, R, and S from 0-4 feet below ground surface in the closure of the Tire Pond.

If you have any questions regarding this matter, please do not hesitate to contact me at (860) 424-3271 or alternatively, you may contact William Sigmund of my staff at (860) 418-5924.

Sincerely,



Diane W. Duva, Assistant Director
Waste Engineering and Enforcement Division
Bureau of Materials Management and Compliance Assurance

DWD/wjs

Copy:

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