



SRSNE Site Group

Remedial Design Project Operations Plan Attachment A

Site Management Plan

Solvents Recovery Service of New England, Inc.
(SRSNE) Superfund Site
Southington, Connecticut

November 2010

**Remedial Design Project
Operations Plan Attachment A**

Site Management Plan

Solvents Recovery Service of
New England, Inc. (SRSNE)
Superfund Site
Southington, Connecticut

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1. Introduction

This document has been prepared on behalf of the SRSNE Site Group, an unincorporated association of Settling Defendants to a Consent Decree (CD) and Statement of Work (SOW) for the Remedial Design/Remedial Action (RD/RA) at the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site in Southington, Connecticut (Site). The CD was lodged on October 30, 2008 with the United States District Court for the District of Connecticut in connection with Civil Actions No. 3:08cv1509 (SRU) and No. 3:08cv1504 (WWE). The CD was entered by the Court on March 26, 2009.

The Site encompasses approximately 14 acres of land at 90 Lazy Lane in Southington, Connecticut. The geographic location of the Site is shown on Figure A-1. Figure A-2 shows the approximate boundaries of the study area that was the focus of prior remedial investigation activities. Figure A-3 shows key Site features and information pertinent to this plan.

1.1 Purpose and Scope

This *Site Management Plan* (SMP) has been prepared to address Section V.C.2.a of the SOW, which requires the inclusion of an SMP as a component of the *Remedial Design Project Operations Plan* (RD POP). Its purpose is to provide the United States Environmental Protection Agency (USEPA) and the Connecticut Department of Environmental Protection (CTDEP) with a written understanding and commitment of how various project aspects such as access, security, contingency procedures, management responsibilities, waste disposal, budgeting and data handling are to be managed during the RD phase of the project. The minimum requirements of the SMP are specified in Attachment C to the SOW, and have been addressed in the development of this plan.

1.2 Document Organization

The remainder of the report is organized into seven sections, each of which is identified and briefly described as follows:

- **Section 2 – Project Roles and Responsibilities:** summarizes the key remedial action participants and their roles.

- **Section 3 – Property Ownership and Access:** discusses ownership of the Site and surrounding areas, as well as notification requirements and planned procedures for obtaining access to nearby properties as needed.
- **Section 4 – Site Control:** presents Site control measures and security, health and safety zones, Site layout, and notification procedures for town and emergency personnel.
- **Section 5 – Perimeter Air Monitoring Plan:** indicates that perimeter air monitoring is not anticipated in conjunction with RD activities, but will be developed and implemented as warranted during RA activities.
- **Section 6 – Waste Stream Management:** discusses the approach for managing the various waste streams that could be generated during RD activities.
- **Section 7 – Financial Reporting:** indicates that SOW-specified financial reporting will be addressed as a component of Annual State of Compliance Reports.
- **Section 8 – References:** lists the references that are cited throughout the text of the SMP.

2. Project Roles and Responsibilities

The following table summarizes the key participants in the RD activities for the Site, and identifies their roles and contact information:

Organization/ Contact	Role	Contact Information
USEPA	<ul style="list-style-type: none"> Lead regulatory agency overseeing response actions at the Site. 	Karen Lumino Remedial Project Manager USEPA Region 1 5 Post Office Square, Suite 100 Mail Code OSRR07-4 Boston, MA 02109 (617) 918-1348 lumino.karen@epamail.epa.gov
CTDEP	<ul style="list-style-type: none"> State regulatory agency involved in project review and providing support to USEPA. 	Ryan Santos CTDEP Bureau of Water Management 79 Elm Street Hartford, CT 06106 (860) 424-3865 ryan.santos@ct.gov
SRSNE Site Group	<ul style="list-style-type: none"> Signatory parties to the CD responsible for overall performance of RD/RA activities for the Site 	c/o Bruce Thompson of de maximis, inc. (see below)
de maximis, inc. (de maximis)	<ul style="list-style-type: none"> Supervising Contractor Project Coordinator (Mr. Bruce Thompson) Independent Quality Assurance Team (IQAT) 	Bruce Thompson 200 Day Hill Road Suite 200 Windsor, CT 06095 (860) 298-0541 brucet@demaximis.com
ARCADIS	<ul style="list-style-type: none"> Remedial Design Contractor responsible for the development of Remedial Design Work Plans. 	Jeffrey S. Holden, P.E., LEP Project Manager 160 Chapel Road Suite 201 Manchester, CT 06042 (860) 533-9906 Jeffrey.Holden@arcadis-us.com

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Organization/ Contact	Role	Contact Information
TerraTherm	<ul style="list-style-type: none"> In-situ thermal remediation (ISTR) contractor responsible for design and implementation of the ISTR component of the remedy. 	John LaChance Project Manager 10 Stevens Road Fitchburg, MA 01420 (978) 343-0300 jlachance@terraetherm.com
Weston Solutions	<ul style="list-style-type: none"> Responsible for operation, maintenance, and modifications to the Hydraulic Containment and Treatment System (HCTS). 	Erin Kinney Senior Project Manager 148 Eastern Boulevard Glastonbury, CT 06033 (860) 368-3200 Erin.Kinney@WestonSolutions.com
<i>de maximis</i> Data Management Solutions, Inc. (ddms)	<ul style="list-style-type: none"> Provide data management services, including data validation and database management 	Polly Newbold ddms 186 Center Street, Suite 290 Clinton, NJ 08809 pnewbold@ddmsinc.com
Conklin & Soroka	<ul style="list-style-type: none"> Field survey 	Todd Andrews Principal/Project Manager 1484 Highland Avenue Cheshire, CT 06410 (203) 272-1135 tandrews@conklinandsoroka.com
TestAmerica Laboratories	<ul style="list-style-type: none"> Laboratory analytical services 	Johanna Dubauskas 128 Long Hill Cross Road Shelton, CT 06484 (203) 929-8140 Johanna.dubauskas@testamericainc.com
Microseeps	<ul style="list-style-type: none"> Laboratory analytical services 	Rachel Whitby 220 William Pitt Way Pittsburgh, PA 15238 (412) 826-2389 rwhitby@microseeps.com

The general project “Organization Chart” (below) depicts lines of communication and identifies key individuals. If the scheduling of the project

requires different personnel to be appointed to the site, the organization chart will be updated, as required, and consistent with notification procedures identified in the CD.

2.1 Agencies

All formal communication from the Agencies (USEPA and CTDEP) regarding the Site will be directed to the Project Coordinator and the SRSNE Site Group, as provided in the CD. In order to maximize the efficiency and usefulness of coordination with the Agencies during the project, and to maximize communications from the field, effective on-site communications between the IQAT and the on-site Agency personnel and/or Agencies' representatives will be developed and implemented.

2.2 SRSNE Site Group

The SRSNE Site Group refers to the unincorporated association of Settling Defendants to the RD/RA CD and SOW for the Site. All formal communication from the SRSNE Site Group regarding the Site will be directed to the Project Coordinator and the Agencies, as provided in the CD.

2.3 Supervising Contractor/Project Coordinator/IQAT

The SRSNE Site Group has retained de maximis to function as the Supervising Contractor, Project Coordinator and IQAT.

2.3.1 Supervising Contractor

As provided in the CD, the Supervising Contractor shall mean the principal contractor retained by the SRSNE Site Group to supervise and direct the implementation of the RD/RA work activities.

2.3.2 Project Coordinator

On behalf of the SRSNE Site Group, Mr. Bruce Thompson will serve as the Project Coordinator and Mr. John Hunt will serve as the Alternate Project Coordinator. The Project Coordinator will assign other supporting contractors to assist with development and implementation of RD documents. Per SOW

Section VIII.A, Monthly Progress Report(s) will be compiled and submitted to the Agencies by the Project Coordinator on behalf of the SRSNE Site Group.

The Project Coordinator is the primary contact with the SRSNE Site Group, USEPA, CTDEP, RD Contractors and RA Contractors.

2.3.3 IQAT

In accordance with SOW Section V.D.1.i, the functions and responsibilities of the IQAT, with respect to design and construction shall include, at a minimum, the following:

- Review design criteria, plans, and specifications for clarity and completeness.
- Train Construction Quality Assurance (CQA) inspection personnel on project Quality Assurance (QA) requirements and procedures.
- Schedule and coordinate CQA inspections.
- Verify that the Quality Control (QC) plan for construction activities is implemented in accordance with the site-specific QA plan for these construction activities.
- Perform independent on-site inspections of the work as needed to assess compliance with the approved design criteria, plans and specifications.
- Report the results of all inspections, including findings that the work is not acceptable quality or fails to meet the specified design requirements to the SRSNE Site Group and the Agencies.

The IQAT will participate in Technical Information Meeting(s), Pre-Construction Conference(s), Construction Progress Meeting(s) and Final Construction Inspection(s) during the course of work. It will be the responsibility of the IQAT to observe the construction of the RA Contractor(s) and report on observations and progress. The IQAT will be on site during pre-design studies, such as soil sampling, monitoring well installation and monitoring well sampling. The level

of IQAT field oversight will vary depending on the nature of Site activities and overlapping activities that occur at one time.

de maximis will assign an IQAT Manager who will be the primary contact for all IQAT functions during work at the Site and will be the primary IQAT contact with the Agencies' Site Representative, Project Coordinator, RD Contractors and RA Contractors.

2.4 Remedial Design Contractor(s)

All RD work performed by the SRSNE Site Group pursuant to the CD shall be carried out under the direction and supervision of a qualified RD Contractor(s). Per Section V.B.2 of the SOW, notification to the Agencies of the RD Contractors was made on November 7, 2008 and January 15, 2009. The Project Coordinator will be the primary contact with the RD Contractor(s).

2.4.1 ARCADIS

The SRSNE Site Group has retained ARCADIS to perform overall RD activities for the Site and ARCADIS will be the primary author of the *Quality Assurance Project Plan* (QAPP). Notification to the Agencies of the selection of ARCADIS was provided on November 7, 2008.

2.4.2 Weston Solutions, Inc.

The SRSNE Site Group has retained Weston Solutions, Inc. (Weston) to support ARCADIS with RD activities and continue operation of the HCTS. Notification to the Agencies of the selection of Weston was provided on November 7, 2008.

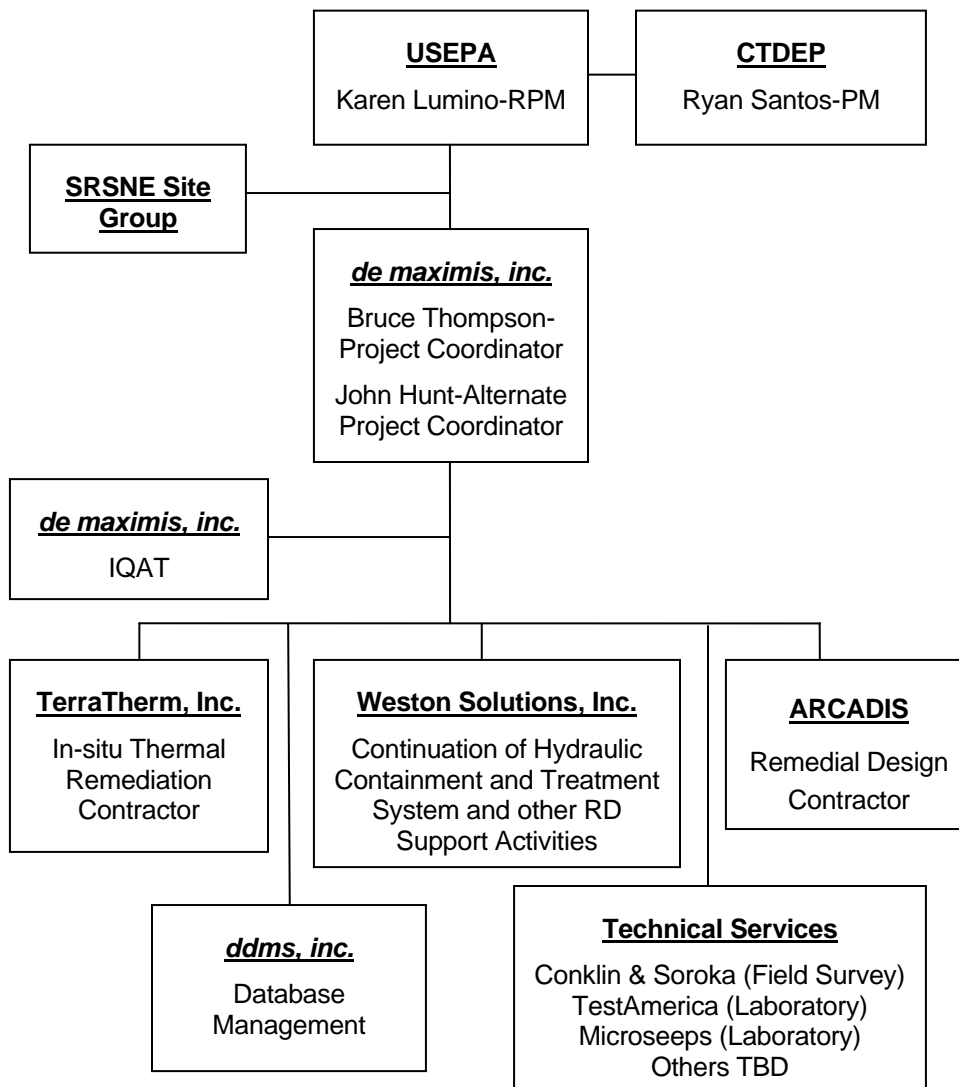
2.4.3 TerraTherm, Inc.

The SRSNE Site Group has retained TerraTherm, Inc. (TerraTherm) to assist with the Remedial Design Work Plan (RDWP), and to design and perform the ISTR portion of the Site remedy. Notification to the Agencies of the selection of TerraTherm as the ISTR contractor was provided on January 15, 2009.

2.5 Supporting Contractors(s)

Supporting Contractors will be utilized by the Project Coordinator and Design Team to complete components of the RD work including data management services, field survey and laboratory analysis. Supporting Contractors will report directly to the Project Coordinator or Design Team which has contracted the support work.

Project Organization Chart



3. Property Ownership and Access

The following addresses Section IX of the CD requirements related to obtaining access to the Site and private/public properties as necessary for the implementation of RD/RA activities.

The RDWP and associated *Field Sampling Plan* (FSP) describe a series of Pre-Design Investigations (PDIs) that require access to the Site and properties not owned or controlled by the SRSNE Site Group. These parcels are presented on Figure A-4. The properties and the corresponding owners of each of the parcels shown on this figure are listed in Table A-1.

All agreements providing access will apply to the SRSNE Site Group, the United States on behalf of USEPA, and the State, as well as their representatives (including contractors), for the purpose of conducting any activity related to the RD/RA implementation.

3.1 Site Access

The SRSNE Site Group currently has access to the Operations Area and former Cianci Property. The group was granted access to the Town Well Field Property and railroad right-of-way areas during the Remedial Investigation (RI), Feasibility Study (FS), and Non-Time-Critical Removal Action (NTCRA) 2 phases of the project, and soon expects to have access to those areas for RD/RA purposes.

3.2 Access to Private/Public Property

Consistent with the requirements of Paragraph 26 of the CD, if access to property owned or controlled by persons other than the SRSNE Site Group is required to implement the RD/RA activities, the SRSNE Site Group shall use best efforts to secure access from such persons in accordance with Paragraph 28 of the CD.

To obtain access, letters requesting access to properties within and adjacent to the footprint of the proposed remedial activities will be prepared by the Project Coordinator and sent via registered mail or overnight courier service to the property owner(s). The letter will inform the property owner of the planned remedial activities, describe the nature and anticipated duration of the planned

work, provide a description of the potential impacts of the work, provide assurance that such impacts will be mitigated to the extent practicable, and describe restoration plans, if appropriate. An example of the notification letter is included in Appendix A-1.

In the event that a property owner does not grant access following "best efforts," including the payment of reasonable sums of money in consideration of access, the SRSNE Site Group will promptly notify the USEPA and the CTDEP in writing. The notification will include a summary of the steps taken presenting the situation to the USEPA. The SRSNE Site Group will coordinate with USEPA to identify potential alternative locations for the subject work. It is possible that USEPA would need to intervene to obtain property access if a suitable alternative location cannot be identified nearby.

3.3 Property Owner Contact Information

As noted above, Table A-1 lists the names and addresses of the property owners where access will need to be obtained. Should access to additional properties be required in order to complete any RD/RA activities, the USEPA will be informed, and the appropriate property owner will be contacted to request access, as described in Section 3.2.

4. Site Control

The SRSNE Site comprises portions of several properties/areas, including the former SRSNE Operations Area, the former Boston & Maine (B&M) railroad right-of-way, the Cianci Property, and the Town Well Field Property. These properties/areas are depicted on Figure A-2, and represent the primary areas in which RD-related activities will be performed. As described in Section 3, access to adjacent properties may also be necessary for implementing certain RD/RA activities (e.g., for delineating the extent of non-aqueous phase liquid (NAPL) near the former Operations Area and the extent of groundwater exceeding performance standards east of the Quinnipiac River).

Existing site features are depicted on Figure A-3. Primary access to the Site is from Lazy Lane to the north, where an access road is located immediately east of the railroad right-of-way. An alternate Site access route is located just west of the railroad tracks; this route allows for direct equipment access to the former Operations Area. A treatment system building is situated on the former Cianci Property and has utility services that can support RD activities (e.g., water, electric, sanitary).

In general, minimal Site modifications are anticipated for the purpose of implementing RD activities. One anticipated modification will be mobilization of a field trailer to be staged at the location indicated on Figure A-3. The trailer would be mobilized in support of heavy or extended periods of RD field work, such as groundwater sampling activities. The trailer would provide a location for daily meetings, sample processing, and equipment storage. Utility services would be obtained from the existing service at the treatment building. During periods of less intense RD field work, the existing treatment building would serve as base for RD-related fieldwork.

4.1 Site Security and Control

Site security and control during the RD phase of the project will be provided by existing fencing and gates, access controls, and implementation of safe work practices.

4.1.1 Fencing

As shown on Figure A-3, chain-link fencing fully encompasses the perimeter of the former SRSNE Operations Area. Access into this area is via a swing gate along the driveway entrance from Lazy Lane, and via several man-gates along the south and east portions of the perimeter fence. These features will be locked at all times except when access is necessary for equipment and personnel to perform RD/RA-related activities in these areas.

As also shown on Figure A-3, perimeter chain-link fencing is present around the majority of the Cianci Property with the exception of the boundary formed by the Quinnipiac River (where fencing is not possible, but access is nonetheless controlled by the presence of the river). A swing gate is present along the primary access from Lazy Lane to the treatment system building; this gate will be locked at all times when personnel are not present for operation of the treatment system or performance of RD-related field activities. Man-gates are also present allowing access to the railroad right-of-way and the Operations area to the west of the Cianci Property. The man-gates will remain locked except when needed for access by project personnel to the railroad right-of-way or Operations Area.

Note that the Site extends beyond the former Operations Area and Cianci Property and access cannot reasonably be controlled in all areas. The potential for exposure to Site-related constituents by receptors outside the fenced area is expected to be minimal because impacts in those areas are primarily in groundwater.

In anticipation of RA activities, certain modifications may be made to the perimeter security fence orientation. Specifically, the fencing configuration will be modified to preclude access by unauthorized personnel to the portion of the railroad right-of-way where remedial activities will be performed. In addition, the perimeter fencing north of the treatment system building may be expanded to provide additional secure areas for parking and staging of equipment and materials. Such modifications would be identified as part of the RA-related submittals, and would provide an enhanced degree of access control. To the extent that such modifications may be made prior to the completion of all planned RD activities, the modifications would not affect the ability to perform the RD activities, and would provide an equivalent or enhanced level of security than exists under the current configuration.

4.1.2 Access Controls

During RD/RA activities, fenced portions of the Site will only be accessible to authorized personnel. This includes representatives of the Agencies, the SRSNE Site Group, and their respective consultants and contractors engaged in RD/RA activities and operation of the HCTS. Personnel requiring access to the Site should contact de maximis to make arrangements (e.g., to obtain a key or request a Site escort).

A sign-in/sign-out sheet will be used to monitor personnel access to the Site. Visiting personnel will be required to record the date and time of entry and exit on a designated sign-in/sign-out sheet. An example sign-in/sign-out sheet is provided in Appendix A-2. This sheet will be maintained inside the treatment system building during normal operations. In the event of substantial RD-related field work (e.g., implementation of groundwater sampling activities), a support trailer will be staged at the location shown on Figure A-3, and the sign-in/sign-out sheet will be maintained in the support trailer.

4.1.3 Safe Work Practices

Project personnel will be on site during RD activities for the purposes of operating the HCTS and implementing RDWP activities. The presence of such personnel will provide for ongoing surveillance during remediation activities.

Site security will also be provided through the use of safe work practices to minimize theft, vandalism and/or access/exposure by unauthorized persons. Such practices include, but are not limited to, securing/locking construction equipment and tools during non-work periods, removing keys from motorized equipment, and conducting a security review and check at the conclusion of each work day.

4.2 Health and Safety Zones

The site *Health and Safety Plan* (HASP) (Attachment D to the RD POP) calls for the establishment of three types of work zones, as needed, when conducting field activities:

- Exclusion Zone (EZ) – any portion of the site where hazardous substances are, or are reasonably suspected to be, present and pose an exposure hazard to on-site personnel conducting specific work activities.
- Contamination Reduction Zone (CRZ) – area between the EZ and support zone that provides a transition between contaminated and clean areas.
- Support Zone (SZ) – all areas of the Site, except the EZ and CRZ. The SZ surrounds the CRZ and EZ. Support equipment, staging, and break areas are located in this zone.

Health and safety zones will be established as appropriate for specific work activities. The need for formally establishing and delineating such zones will depend on the nature of the work activity and the level of personal protective equipment (PPE) necessary for the task. For example, a CRZ will not likely be necessary when performing well inspections or groundwater sampling in “Level D” PPE. Furthermore, a CRZ for one task may be an EZ for another task.

Figure A-3 depicts a “typical” health and safety zone configuration for work activities to be conducted within the former SRSNE Operations Area. It reflects an approach wherein support activities occur in the vicinity of a field office trailer, access to the Operations Area is provided by man-gates in the existing fencing, and work activities occur within the fence surrounding the Operations Area. Actual zones for each remedial activity will be determined based on the specific scope of work being performed, and may be modified depending on the nature and location of specific work activities.

4.3 Notifications

Prior to commencing any subsurface intrusive activities, Connecticut’s Call Before You Dig (CBYD) utility locating service will be notified. The CBYD notification must be made a minimum of two full working days (not including the day the notice is provided) prior to the start of ground-intrusive activities, and is good for 30 days.

To the extent that RD activities require access to adjacent properties where the SRSNE Site Group does not already have access approvals, the

associated property owner(s) would be notified and approached for execution of an access agreement. Off-site property access is further discussed in Section 3.

Public notifications of key project milestones will also be made, as needed, consistent with the USEPA's community relations approach for this project. The SRSNE Site Group's role in supporting such notifications is described in the *Community Relations Support Plan* (Attachment E to the RD POP).

4.4 Data Management

The SRSNE project will utilize a secure web-based application created and hosted by ddms called Project Portal™. Project Portal is an online resource sharing platform which the team can utilize to view, download or upload project documents and data. Project Portal was specifically designed for use on large environmental projects involving a multitude of stakeholders. The system contains specialized modules for use by the team including Document Management, Project Calendar, queryable Environmental Database, GIS (for mapping) and Project Tables.

Authorized users will be able to query, trend and map historic and contemporary physical, analytical and field measurement data within the Project Portal system. For advanced needs, data are easily exported to one of several common file types (e.g., ESRI® Shapefile, GoogleEarth® KML, Microsoft Excel®, Text File and EQuIS® 4-File Format). Coordinates of all sample locations will be made available to the project team through the "Sample Location" summary table. This table will be kept up-to-date as the project progresses, at any point users may export the locations and associated coordinates into a downloadable Excel file.

4.4.1 Analytical Data

In addition to accessing actual data, project team members will be able to log into the Project Portal system and view analytical data delivery progress by sample delivery group (SDG) through a SDG tracking table. The data management coordinator (e.g., ddms) will be responsible for checking boxes to communicate when the following have happened:

1. Lab report and associated EDD are received by ddms via email from the lab.
2. Data have been imported into the environmental database and have undergone basic data QA/QC exercise in a preliminary format. Each record will be clearly marked as “UNVALIDATED” at this point and will be available for the team to utilize as such.
3. Data have been validated. “UNVALIDATED” will be replaced by the date validated and the personnel who performed the validation. Any changes to the lab-issued qualifiers and/or results will also be recorded and distributed with the data.

The data management coordinator will coordinate with the contract lab to create electronic data deliverable (EDD) files per the GEMS v6 specification which the lab will use to issue digital (see QAPP, Attachment C to the RD POP, for GEMS v6 Data Dictionary). Besides being recorded in the SDG tracking table, a digital copy of the lab report, chain of custody and EDD will be posted to the Document Management Module in Project Portal for archival and backup purposes after analytical results are issued by the lab.

4.4.2 Field Measurement Data

The data management coordinator will issue field data spreadsheet templates to project consultants for the purposes of streamlining the process of moving measurement values from the field into the project environmental database. One field data spreadsheet will be filled out per field sampling event and posted to a designated location within Project Portal Document Management Module for archival and data transportation purposes (i.e., ddms personnel will obtain the field data spreadsheets from the Document Management Module).

Field data will then be imported into the project environmental database. Once there, project team members will be able to query it out and manipulate as along with the analytical data.

5. Perimeter Air Monitoring Plan

Attachment C to the RD/RA SOW indicates that the SMP should include provisions for monitoring airborne contaminants released by Site activities that could affect local populations. Considering the minimally intrusive nature of the RD activities, the lack of potential receptors in the immediate proximity of the work, and the fact that work-zone air monitoring will be performed by Site personnel consistent with the requirements of the HASP (Attachment D to the RD POP); a perimeter air monitoring program is not anticipated to support RD activities. To the extent that such monitoring may be appropriate for larger-scale Site work to be performed as part of the RA (e.g., grading of the Operations Area in support of ISTR implementation), plans for a perimeter monitoring program would be developed and included with the appropriate RA-related submittals.

6. Waste Stream Management

As discussed in the HASP (Attachment D to the RD POP), off-site disposal of waste material generated during RD-related activities will be coordinated with the appropriate parties according to the properties of the waste material. The following table summarizes potential RD-related waste streams and the management approach for each:

Waste Stream Description	Management Approach
Used personal protective equipment (PPE)	PPE will be removed in the CRZ, placed within plastic bags in accordance with the HASP, and labeled for proper characterization and disposal.
Soil Cuttings	Soil cuttings from drilling activities east of the Quinnipiac River will be containerized and transported to the NTCRA 1 Containment Area. These cuttings will be screened with a photoionization detector (PID) and, if the PID reading is less than 5 parts per million (ppm) above background, they will be spread over the ground inside the NTCRA 1 sheet pile wall. Drill cuttings from locations west of the Quinnipiac River will be screened with a PID at the drilling location and, if the PID reading is less than 5 ppm above background, the cuttings will be spread over the ground adjacent to the drilling location. Drill cuttings that exhibit a PID reading higher than 5 ppm over background will be containerized and transported to the NTCRA 1 Containment Area for additional screening, characterization and proper off-site disposal, if necessary. Containers used to transport and store drill cuttings will be labeled in terms of contents, location and date filled.
Decon Fluids	Accumulated wash water collected during equipment decontamination will be containerized for subsequent treatment using the HCTS.
Purge Water	Purge water collected during groundwater sampling activities will be discharged to the well pack of one of the NTCRA 1 extraction wells for treatment.
Decon Pads	Polyethylene sheeting used in the construction of decon pads will be containerized pending disposal.

All drums will be staged in an appropriate area within the CRZ and labeled appropriately based on the contents of the drum. Pending the results of

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characterization sampling, waste material will be spread within the Operations Area, discharged to the NTCRA system, or transported to an approved disposal facility by a licensed hauler in accordance with local, state and federal regulations.

For the purposes of waste disposal, the SRSNE Site Group will be considered the generator of any off-site waste shipments. de maximis will be responsible for signing all manifests as “agent for and on behalf of the SRSNE Site Group.”

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7. Financial Reporting

Financial reports summarizing RD/RA expenditures by the SRSNE Site Group will be provided with Annual State of Compliance Reports, which will be submitted in accordance with Section VIII.B of the SOW.

8. References

BBL. 1998. *Remedial Investigation Report*. June 1998.

BBL and USEPA. 2005. *Feasibility Study Report*. Solvents Recovery Service of New England, Inc. Superfund Site, Southington, Connecticut. May 2005.

de maximis, inc. 2008. Identification of RD Team and Submittal of Qualifications and Experience Information. November 7, 2008.

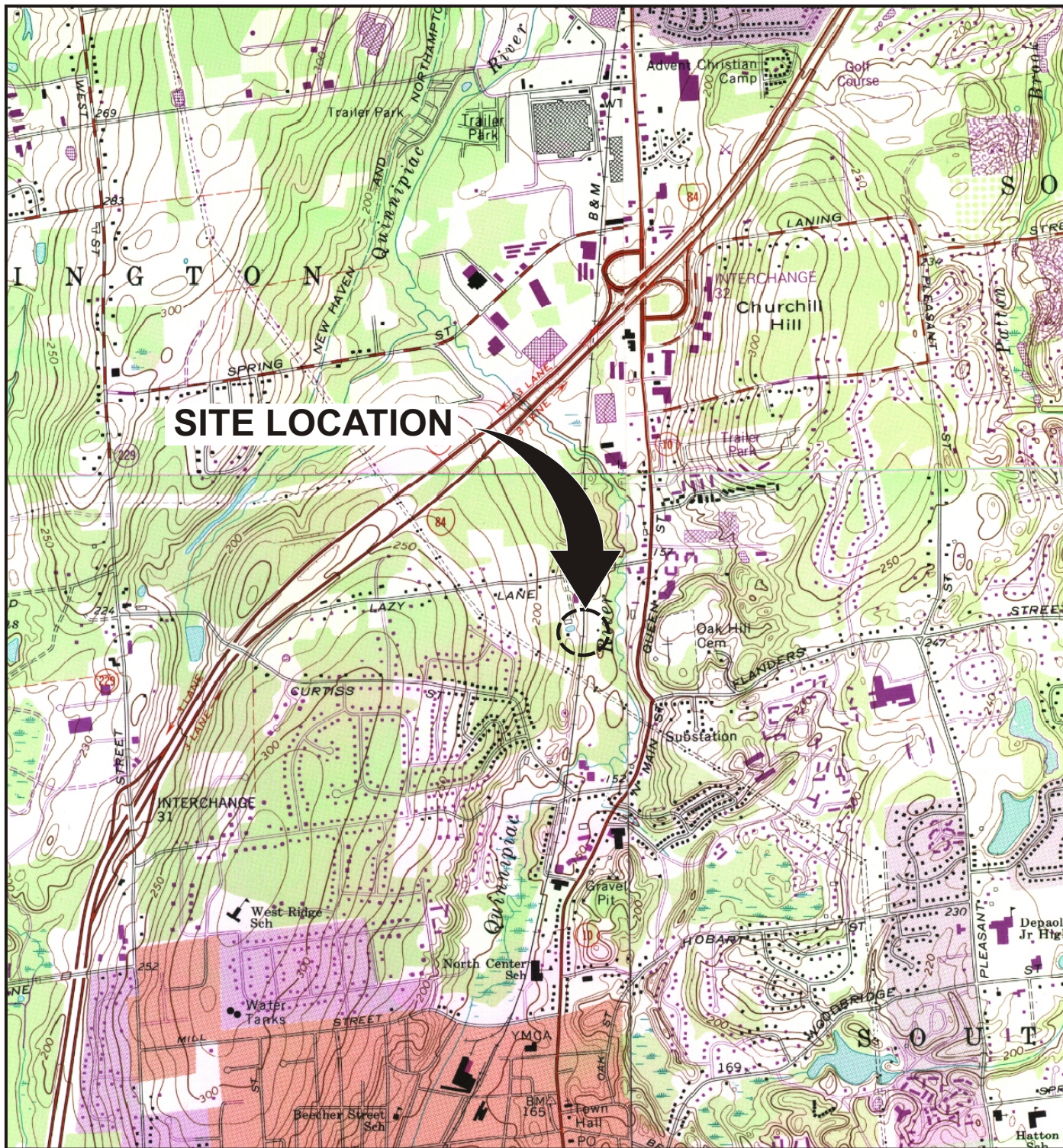
United States District Court for the District of Connecticut. 2008. Consent Decree Regarding Solvents Recovery Service of New England, Inc. Superfund Site. August 29, 2008.

USEPA. 2005. Record of Decision Summary, Solvents Recovery Service of New England, Inc. (SRSNE) Site, Southington, Connecticut. September 2005.

Table A-1.
Property Owner Contact Information
SRSNE Superfund Site, Southington, CT

Parcel No.	Property Owner	Address	List #	Land Classification	Mailing Address
145001	SPINELLI STEPHEN JR ET AL	86 Queen St.	011981	Commercial	PO Box 4369 Houston, TX 77210
145002	VICCO MANAGEMENT REAL ESTATE #V LLC	90 Queen St.	013091	Commercial	755 W. Main St. Branford, CT 06475
145003	M & J REALTY LLC	94 Queen St.	002640	Commercial	94 Queen St. Southington, CT 06489
145004	KREZEL CYNTHIA M	100 Queen St.	006683	Commercial	41 Tallwood Dr. Southington, CT 06489
145005	DOMINIQUE CLARENCE	134 Queen St.	002641	Commercial	125 Crest Rd. Southington, CT 06489
145006	142 QUEEN LLC	142 Queen St.	009893	Commercial	142 Queen St. Southington, CT 06489
145007	CUGLIARIS REALTY LLC	166 Queen St.	010356	Commercial	88 Beal Dr. Southington, CT 06489
145008	P J OF SOUTHINGTON INC	172 Queen St.	012090	Commercial	C/O 9 Dogwood Dr. Danbury, CT 06811
145009	E & J MAYO LLC	176 Queen St.	009691	Commercial	176 Queen St. Southington, CT 06489
145010	K & J MAYO LLC	30 Lazy Ln.	004210	Commercial	176 Queen St. Southington, CT 06489
145011	LAZY LANE CORP	90 Lazy Ln.	002201	Industrial	14 Huntley Rd. Holmdel, NJ 07733
145012	S R S INCORPORATED	114 Lazy Ln.	012011	Commercial	14 Huntley Rd. Holmdel, NJ 07733
145013	MAIELLARO MICHAEL	106 Lazy Ln.	007589	Commercial	106 Lazy Ln. Southington, CT 06489
145014	YORSKI RAYMOND & YOLANDA	156 Lazy Ln.	013655	Residential	156 Lazy Ln. Southington, CT 06489
133061	JADEL FARMS INC	136 Curtis St.	005940	Industrial	400 Shuttle Meadow Dr. New Britain, CT 06052
133066	SOUTHINGTON TOWN OF	Curtis St.	014018	Exempt	75 Main St. Southington, CT 06489
133070	REPOLI DENNIS F & FRANCIS N	Queen St.	010556	Vacant Comm.	755 Manchester Rd. PO Box 8 East Glastonbury, CT 06025
133071	MJM MILESTONE LLC	72 Queen St.	002038	Commercial	72 Queen St. Southington, CT 06489
133072	OAK HILL CEMETERY ASSOC	Queen St.	013973	Cemeteries	North Main St. Southington, CT 06489
122053	INLAND AMERICAN SOUTHINGTON LLC	505 North Main St.	003886	Commercial	2901 Butterfield Rd Oak Brook, IL 60523
145028	254 QUEEN STREET LLC	254 Queen St.	010199	Commercial	43 Commission St. Southington, CT 06489
133043	WROBLEWSKI CEZARY & ANNA K	58 Ivy Dr.	008190	Residential	58 Ivy Dr. Southington, CT 06489
144021	DEMOTSES GENE S	242 Lazy Ln	013083	Residential	242 Lazy Ln. Southington, CT 06489
145021	CT DEP			Former Rail Road	79 Elm St. Hartford, CT 06106
133063	CT DEP			Former Rail Road	79 Elm St. Hartford, CT 06106
Rail Road	CT DEP	On SRSNE Site		Former Rail Road	79 Elm St. Hartford, CT 06106

Figures



REFERENCE: SOUTHTON, CONN. USGS QUAD. 1968 PR 1992, MERIDEN, CONN. USGS QUAD. 1966 PR 1984, NEW BRITAIN, CONN. USGS QUAD. 1966 PR 1984, & BRISTOL, CONN. USGS QUAD 1967 PR 1984

2000' 0 2000'
APPROX. SCALE: 1" = 2000'



SRSNE SUPERFUND SITE
SOUTHTON, CONNECTICUT
SITE MANAGEMENT PLAN

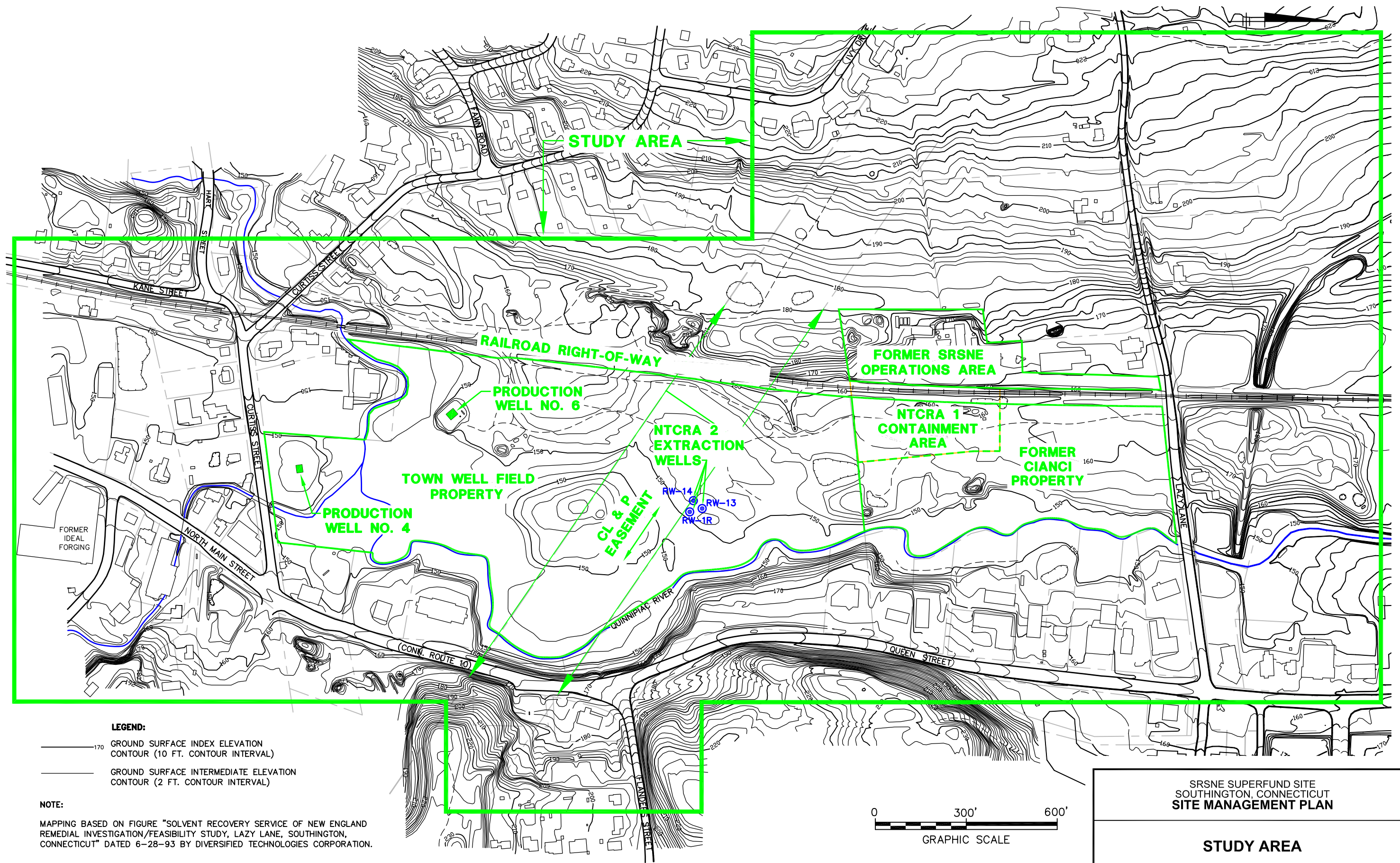
SITE LOCATION MAP



FIGURE
A-1

CITY: SYRACUSE, NY; GROUP: ENVCAD; DB: PGL GMS; PM: M. GEFELL; LVR: ON=OFF=REF; G:\ENVCAD\SYRACUSE\ACT100\054634\000\00014\DWG\54634B03.DWG; LAYOUT: A-2; SAVED: 3/19/2009 8:27 AM; ACADVER: 17.05 (LWS TECH); PAGES: 17; PLOT: 3/19/2009 8:27 AM; BY: STOWELL, GARY

XREFS: 54634X01
IMAGES: PROJECTNAME: ---



LEGEND:

- 170 GROUND SURFACE INDEX ELEVATION CONTOUR (10 FT. CONTOUR INTERVAL)
- GROUND SURFACE INTERMEDIATE ELEVATION CONTOUR (2 FT. CONTOUR INTERVAL)

NOTE:

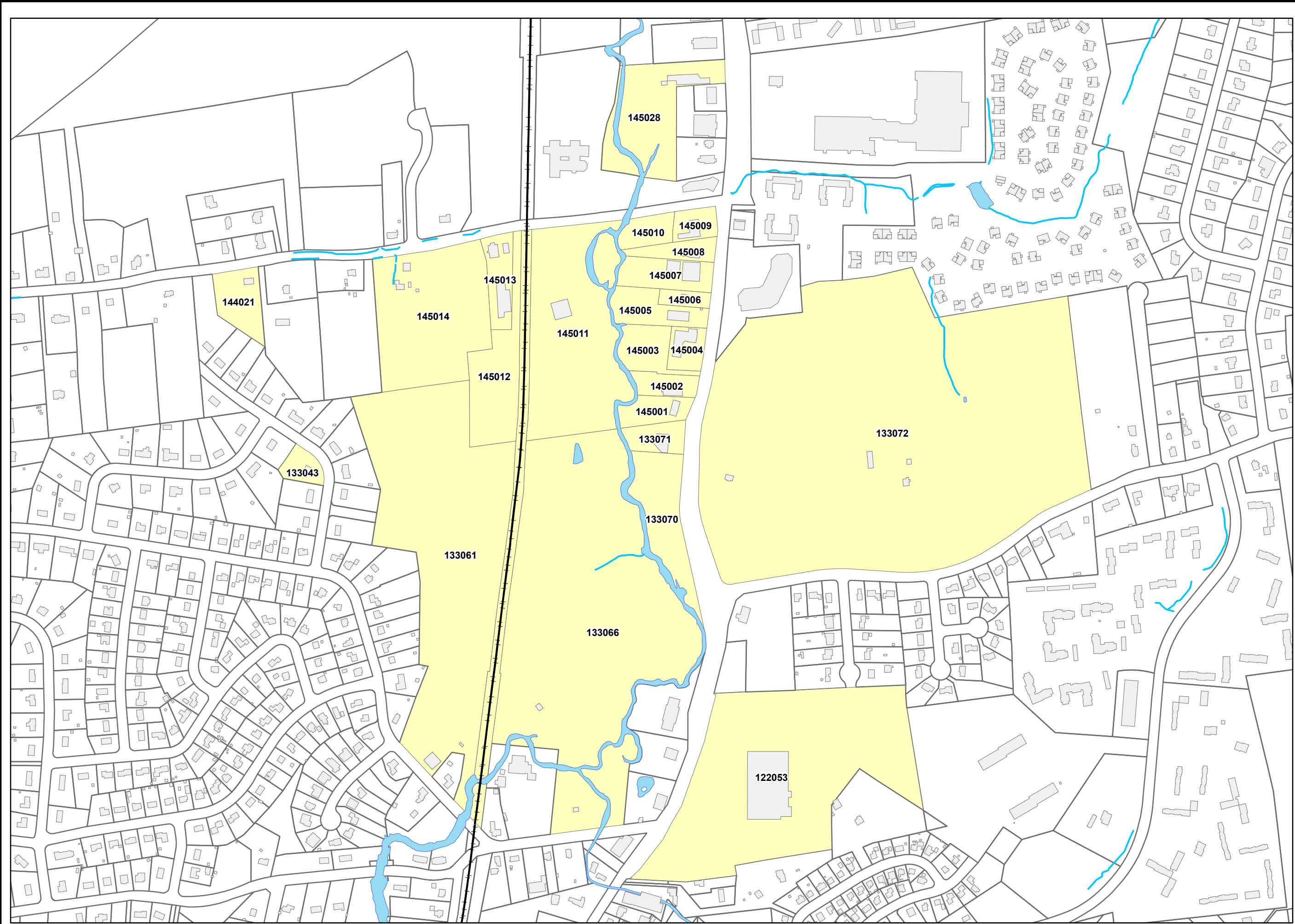
MAPPING BASED ON FIGURE "SOLVENT RECOVERY SERVICE OF NEW ENGLAND REMEDIAL INVESTIGATION/FEASIBILITY STUDY, LAZY LANE, SOUTHTON, CONNECTICUT" DATED 6-28-93 BY DIVERSIFIED TECHNOLOGIES CORPORATION.

SRSNE SUPERFUND SITE
SOUTHTON, CONNECTICUT
SITE MANAGEMENT PLAN

STUDY AREA



FIGURE
A-2




SRSNE
Off-Site Properties
Requiring Access
Figure A-4

Description:
Access requests for offsite
properties

- Map Legend:**
- Railroad
 - Stream
 - Building
 - Lake
 - River
 - Parcel Boundary
 - Parcel of Interest

Spatial Projection:

 Coordinate System:
Connecticut State Plane
FIPS Zone: 0600
Units: US Survey Feet
Datum: NAD83

Plot Info:
File: 090403_SRSNE_access.mxd
Project No.: 1547-3212
Plot Date: April 3, 2009
Arc Operator: JJK
Revised By: TH

Appendix A-1

Example Access Notification
Letter

Date

{Property Owner Name}
{Property Owner Address}
{Property Owner Town/City}

Subject: Access to Property at {Address} Southington, CT

Dear Sir/Madam or Mr. / Ms.:

This letter requests access to your property located at {Address} Southington, CT to conduct certain investigations in support of the Remedial Design / Remedial Action (RD/RA) at the Solvent Recovery Services of New England, inc. (SRSNE) Superfund Site (the "Site") in Southington, CT. The City of Southington, CT public records indicate that the property is defined as Parcel number {Parcel No.}.

de maximis inc. has been selected by the SRSNE Site Group to serve as Project Coordinator and Supervising Contractor for the RD/RA activities at the Site.

The SRSNE Site Group has entered into a Consent Decree (CD) with the United States Environmental Protection Agency (USEPA) pursuant to which remedial response actions at the Site will be designed and implemented. The CD was lodged on October 30, 2008. RD related activities are anticipated to take at least two years.

Information on the history of the Site can be found at:

http://yosemite.epa.gov/r1/npl_pad.nsf/f52fa5c31fa8f5c885256adc0050b631/B03BF769BDA06D1B8525691F0063F6F7?OpenDocument

(or by performing a search for SRSNE at):

<http://www.epa.gov/region1/superfund/index.htm>

Pursuant to Paragraph 27 of the CD, if access to any property is necessary to perform investigation or response actions, an access agreement must be obtained that grants access to the SRSNE Site Group, their authorized representatives (meaning contractors retained by the SRSNE Site Group, which include ***de maximis, inc.*** and its contractors), USEPA and the Connecticut Department of Environmental Protection (CTDEP), as well as their officers, employees, agents, contractors, consultants, and other authorized representatives for purposes of implementing and overseeing the implementation of the work to be performed under the CD. The specific work will be detailed in project work plans that will be reviewed and approved by USEPA in

consultation with the CTDEP. The purpose of the RD is to collect samples from various media for laboratory analysis, to support the design process.

Prior environmental studies conducted at the Site have included {list out activities, if any} on your property. We currently anticipate that completing the RD will require the following activities on your property:

- Land survey;
- Installation of surface water monitoring stations;
- Surface water monitoring;
- Collection of sediment samples;
- Exploration soil borings and collection of soil samples; and
- Installation of temporary or permanent groundwater monitoring wells and collection of groundwater samples.

The RD process will proceed in a phased manner, starting with the activities detailed below. The need for remedial action activities on your property will be determined based on the results of the RD process. We will contact you again at the conclusion of the RD process to discuss whether the RD process has identified specific activities needed on your property.

{Property Owner} should know that at times during RD activities, a representative from de maximis, one or several of the contractor firms named above or USEPA may be on-site to observe and oversee these activities.

At this time, we are requesting permission to access your property to conduct the following activities:

Land Survey

Land survey is a necessary, ancillary task to provide survey control and a base map for design development. The land survey task will involve the following major elements:

- Locate visible Site features, including, roadways, paths, drainages, culverts, fence, and other features
- Subsurface utility information will be compiled from field observations/measurements and available record information.

This activity will utilize one, 2-person team, a vehicle and the necessary field instruments to conduct the land survey. The team will be wearing regular work clothes with high visibility vest. This activity will take {proposed work period} to complete.

Surface Water Sampling

This activity will be performed by a 2-person team. Surface water sampling equipment will consist of one vehicle, coolers containing sample bottles, and field instruments. The team will be wearing regular work clothes, hip waders (if needed) and protective gloves. This activity will be conducted {proposed work period}.

Sediment Sampling

This activity will be performed by a 2-person team. Equipment used for the collection of sediment samples include one vehicle, coolers containing sample bottles, stainless steel spoons and bowls, and field instruments. The team will be wearing regular work clothes, hip waders and protective gloves. This activity will take {proposed work period} to complete.

Monitoring Well Installation

The SRSNE Site Group will be installing {# of Wells} as shown on the attached figure. This activity will be performed by one field geologist and a two person drilling team. Drilling equipment will consist of a drill rig, a geoprobe and/or hand driven monitoring point, two support vehicles, coolers containing sample bottles, stainless steel spoons and bowls, and field instruments. The team will be wearing regular work clothes with protective gloves. This activity will take {proposed work period} to complete.

Monitoring Well Elevation Survey

This activity will utilize one, 2-person team, a vehicle and a water level measuring device. The monitoring well survey will consist of locating and opening {# of Wells} existing wells and documenting observations. Collecting groundwater elevations will consist of lowering the water level measurement device into the existing monitoring well to measure the depth to groundwater. The team will be wearing regular work clothes with protective gloves. This activity will take {proposed work period} to complete.

Groundwater Sampling

This activity will also consist of one, 2-person team, a vehicle and an array of small equipment. The equipment list will consist of a pumping apparatus, coolers with sample bottles, poly tubing, instrumentation to measure groundwater quality parameters, water level meter, a tool box, airlines and regulators and a bottle of nitrogen (inert gas - non-flammable). The nitrogen bottle will be used in place of a generator to limit intrusive

noise. The team will be wearing regular work clothes with protective gloves. This activity will take {proposed work period} to complete.

Exploration Soil Boring

The SRSNE Site Group will be installing {# of Borings} as shown on the attached figure. This activity will consist of one field geologist and a two person drilling team. Drilling equipment will consist of a drill rig, a geoprobe and/or hand driven monitoring point, two support vehicles, coolers containing sample bottles, stainless steel spoons and bowls, and field instruments. This activity will take {proposed work period} to complete.

General Assumptions

- Working hours are from 8am to 5pm Monday through Friday.
- de maximis will provide {Property Owner} one week notice prior to start of any activity on-site.
- All investigative derived waste (IDW) (i.e., soil, groundwater) will be removed from your property and properly disposed.

de maximis and other contractors retained by the SRSNE Site Group will be responsible for the health and safety of their workers while on your property, and will provide you with certificates of insurance at the time we notify you of our intent to start work. In addition, de maximis will maintain the work areas in an appropriate manner, and will coordinate with you or your representative to address any necessary restoration of our work locations.

With respect to the results of any testing performed at your property, de maximis will provide you with the sampling results after USEPA review and we will make ourselves available to discuss with you the results of tests conducted on your property. Attached please find a draft agreement for your review and execution, and a figure showing the location of work to be done on or in the vicinity of your property.

Thank you in advance for your cooperation in helping ***de maximis, inc.*** with this program at the Site. A representative of de maximis will contact you in the next week to discuss any questions you may have regarding this work. In the meantime, if you have any questions in connection with this matter, please contact me at (860) 298-0541.

Sincerely,

Bruce Thompson
de maximis, inc.
Project Coordinator

CONSENT FOR ACCESS TO PROPERTIES

In signing this agreement, {Property Owner} hereby licenses and authorizes the SRSNE Site Group, their contractors, USEPA and the CTDEP, to access portions of the property (excluding buildings) located at {Property Owner Address} in Southington, CT for purposes relating to the Consent Decree (CD) with the United States Environmental Protection Agency (USEPA) pursuant to which remedial response actions at the Site will be designed and implemented. The CD was lodged on October 30, 2008.

Name: _____

Address of Properties:

City:

State:

I consent that officers, employees, contractors, and authorized representatives of the United States Environmental Protection Agency (USEPA), CTDEP and the SRSNE Site Group, may enter upon and have continued access to my property for the purposes of conducting certain work under the terms and as described in the attached letter to me from Bruce Thompson dated {date of letter}.

I realize that these actions are undertaken pursuant to response and enforcement responsibilities under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

This written permission is given by me voluntarily and with knowledge of my right to refuse.

Name: _____

Title: _____

Firm: _____

Date Authorized:

Appendix A-2

Example Sign-In/Sign-Out
Sheet



Activity:

[illegible]