

**FINAL
REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN**

VOLUME II

PROJECT OPERATIONS PLAN

**SITE MANAGEMENT PLAN AND COMMUNITY RELATIONS
SUPPORT PLAN**

**OLIN CHEMICAL SUPERFUND SITE
51 EAMES STREET
WILMINGTON, MASSACHUSETTS**

Submitted to:

United States Environmental Protection Agency

Region I – New England
One Congress Street
Boston, Massachusetts 02114

Submitted by:

Olin Corporation
3855 North Ocoee Street
Suite 200
Cleveland, Tennessee 37312

Prepared by:



MACTEC Engineering and Consulting, Inc.
107 Audubon Road
Wakefield, Massachusetts 01880

August 14, 2009

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Project No. 6107-09-0016.01

August 14, 2009

A handwritten signature in black ink, appearing to read "Peter Thompson", written over a horizontal line.

Peter Thompson
Project Manager

A handwritten signature in black ink, appearing to read "Michael J. Murphy", written over a horizontal line.

Michael J. Murphy
Project Principal

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LIST OF ACRONYMS AND ABBREVIATIONS

3-D	Three-dimensional
AOC	Agreement on Consent
ARAR	Applicable or Relevant and Appropriate Requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Chain of Custody
CRP	Community Relations Plan
CRSP	Community Relations Support Plan
CSL	Calcium Sulfate Landfill
DAPL	Dense Aqueous Phase Liquids
DOT	Department of Transportation
DQO	Data Quality Objective
Draft FRI	Draft Focused Remedial Investigation
EDD	Electronic Data Deliverable
ESRI	Environmental Systems Research Institute
FDRs	Field Data Records
FOL	Field Operations Leader
FSP	Field Sampling Plan
Geomega	Geomega, Inc.
GIS	Geographic Information System
H&S	Health and Safety
HASP	Health and Safety Plan
IDW	Investigation Derived Wastes
IRSWP	Interim Response Steps Work Plan
LIMS	Laboratory Information Management Software
LNAPL	Light Non-aqueous Phase Liquid
MACTEC	MACTEC Engineering and Consulting, Inc.
MassDEP	Massachusetts Department of Environmental Protection
MBTA	Massachusetts Bay Transit Authority
MCP	Massachusetts Contingency Plan
NCP	National Contingency Plan
off-PWD	off-Property West Ditch
Olin	Olin Corporation
OU	Operable Unit

PM	Project Manager
PP	Proposed Plan
POP	Project Operations Plan
PPE	Personal Protective Equipment
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
RAM	Release Abatement Measure
RGP	Remediation General Permit
RI/FS	Remedial Investigation and Feasibility Study
ROD	Record of Decision
RPM	Remedial Project Manager
SAP	Sampling and Analysis Plan
SHSO	Site Health and Safety Officer
Site	Olin Chemical Superfund Site
SM	Site Manager
SMP	Site Management Plan
SOW	Statement of Work
SQL	Sample Quantitation Limit
TED	Technical Environmental Database
USEPA	United States Environmental Protection Agency

1.0 INTRODUCTION

Consistent with the Statement of Work (SOW), the Remedial Investigation and Feasibility Study (RI/FS) Work Plan includes a Project Operations Plan (POP). The POP is a required document within the RI/FS Work Plan and is comprised of three volumes as detailed below. The remaining components of the RI/FS Work Plan are included in Volume I. Volume I discusses the general and Operable Unit (OU) specific objectives from the RI/FS, identifies data gaps and uncertainties to be addressed by the RI/FS Work Plan, the structure, components and objectives for individual RI/FS deliverables, Preliminary Identification of Applicable or Relevant and Appropriate Requirements (ARARs) to help guide the RI/FS, approaches for data assessment and modifications to the RI/FS Work Plan, Data Requirements for Potential Remedial Alternatives and Technologies, and the Expanded Schedule (Critical Path Method) for the RI/FS.

The POP is comprised of four inter-related plans that will guide the completion of the RI/FS. They are detailed in three volumes:

Volume II – Site Management Plan and Community Relations Support Plan

- Site Management Plan (SMP) provides a written understanding and commitment of how various project aspects such as access, security, contingency procedures, management responsibilities, investigation-derived waste disposal, and data handling will be managed;
- Community Relations Support Plan (CRSP) provides a written understanding and commitment of how Olin Corporation (Olin) will support the United States Environmental Protection Agency's (USEPA's) Community Relations Program at the Olin Chemical Superfund Site (Site).

Volume III – Sampling and Analysis Plan

- Volume III-A – Field Sampling Plan (FSP) provides a summary of the sampling objectives and describes the sampling program for each area of investigation at the Site;
- Volume III-B – Quality Assurance Project Plan (QAPP) documents in writing the site-specific objectives, policies, organizations, functional activities, sampling and analysis activities, and specific quality assurance/quality control (QA/QC) activities designed to achieve the data quality objectives (DQO's) of the RI/FS. The QAPP provides sampling, analytical, and validation procedures, as well as QA/QC requirements prepared in accordance with the format required by USEPA Region 1.

Volume IV – Health and Safety Plan

- The Health and Safety Plan (HASP) establishes the procedures, personnel responsibilities, and training necessary to protect the health and safety (H&S) of all on-

Site personnel during the RI/FS. The HASP provides for routine but potentially hazardous field activities and for unexpected Site emergencies, and provides requirements and procedures for biological, physical, and chemical hazards to RI/FS Site workers.

This document, Volume II of the RI/FS Work Plan, includes the SMP and the CRSP. The SMP and CRSP have been prepared for the Site in Wilmington, Massachusetts (Figure 1.0-1), on behalf of Olin by MACTEC Engineering and Consulting, Inc. (MACTEC). The SMP (Sections 2 through 6 of this volume) and CRSP (Section 7 of this volume) have been prepared consistent with Section 2 part II.F.1 of the Statement of Work, Remedial Investigation and Feasibility Study, Olin Chemical Superfund Site, prepared by the USEPA Region I – New England and dated June 2007 (USEPA, 2007).

A detailed description of the Site is contained in Section 1.0 of the Draft Focused Remedial Investigation (Draft FRI) Report for the Site, Wilmington, MA (MACTEC, 2007a). The Site encompasses the approximate 50 acre Olin Property and surrounding areas to the west, east, and south, where contaminants have migrated by surface water and or groundwater transport. The current site features on the Property are shown in Figure 1.0-2. Site features in the surrounding off-Property area are shown in Figure 1.0-3. The Property is bounded on the east by the Massachusetts Bay Transit Authority (MBTA) tracks, on the south by the Woburn/Wilmington Town Line, on the west by an inactive Boston and Maine Railroad spur, and on the north by Eames Street. The Property is located in an industrialized area of Wilmington within a General Industrial zone. Intensive industrial land use occurs on the eastern, northern, and western sides of the Property. The southern side of the property is bounded by the Woburn Landfill, a former municipal solid waste landfill that has been closed. Residential properties are located along Main Street and Cook Avenue, located to the west of the Property, and along Eames Street before it intersects with Woburn Street.

The former facility is located on the northern half of the Property which is currently unused and contains a vacated office building, a small metal butler building, a former guard shack, two vacant warehouses, paved and grassed areas, and concrete slabs from other former buildings. In 2006, Olin installed a forty foot office trailer and two metal storage trailers in the northeast quarter of the Property near Plant B, which houses a groundwater treatment system. Olin has two full time employees that maintain the Property and operate the Plant B treatment system. The Property is enclosed within an 8-foot high fence with four exterior access gates.

The Plant B groundwater recovery/treatment system has been in operation since 1982. The system was installed in response to the seepage of a light non-aqueous phase liquid (LNAPL), from spills of previous owners, into the East Ditch that is located at the eastern perimeter of the former facility property. The treated groundwater is discharged to surface water on the former facility property in compliance with a Remediation General Permit (RGP). Treated groundwater is discharged in batches daily between Monday and Friday during normal working hours. Groundwater extracted on weekends is stored in tanks on the Olin property for treatment during normal operations between Monday and Friday.

A Slurry Wall/Cap containment structure is located on the Property between the existing warehouses and South Ditch. This containment structure was constructed in 2000/2001 as a Release Abatement Measure (RAM) for Dense Aqueous Phase Liquids (DAPL) consistent with the Massachusetts Contingency Plan (MCP) and approved by Massachusetts Department of Environmental Protection (MassDEP). Both Plant B and the containment area are monitored in accordance with the Interim Response Steps Work Plan (IRSWP) (MACTEC, 2007b).

Within the Property, there is also an on-Property ditch system which consists of natural drainages, which were modified in the early 1950s to improve drainage during site development (the on-Property West Ditch and the on-Property South Ditch), and a natural wetland drainage complex (Ephemeral Drainage). These features are shown in Figure 1-2. A surface water body known as the Central Pond and a wetland area known as the Central Wetland are located north of and adjacent to the Lower South Ditch.

The southern half of the Property is forested, except in the southwestern corner where the closed Calcium Sulfate Landfill (CSL) is located. The CSL is approximately 2.5 acres in size. The forested area and the plant operations area are separated by the South Ditch and bordering wetland areas of the Ephemeral Drainage. Approximately 20 acres within this forested area is subject to the terms of an Environmental and Open Space Restriction that restricts future development activities on the portion of the Property.

In accordance with the SOW, a Draft FRI Report was prepared and submitted to USEPA in October 2007 (MACTEC, 2007a). The Draft FRI Report was prepared to support scoping of additional remedial investigations at the Site and identified data gaps for the three OUs at the Site.

The RI/FS Work Plan has been developed to address those specific data gaps and additional data needs identified by USEPA.

2.0 PROJECT ORGANIZATION AND COMMUNICATION

This section, the first section of the SMP, discusses the roles and responsibilities of principal project team members within Olin and MACTEC for the management and implementation of the RI activities presented in the RI/FS Work Plan.

The Project Organization and Communication Chart is provided in Figure 2.0-1. This organization chart is restricted to the major management positions described in the following subsections. Table 2-1 lists these individuals and their contact information.

2.1 PROJECT TEAM MEMBERS

The project team consists of individuals from Olin; MACTEC; and Geomega, Inc. (Geomega). The efforts of MACTEC and Geomega are coordinated through Olin. Olin's project management team consists of two key management positions identified as the Olin Site Team Leader and the Site Manager (SM) whose roles and responsibilities are described in the following section.

MACTEC's project management team consists of five key management positions identified as the Project Manager (PM), the Project Principal, the Site Health and Safety Officer (SHSO), the Project QA/QC Officer, and the Field Operations Leader (FOL) whose roles and responsibilities are described in the following section.

Geomega's project team includes a Senior Geochemist and a Senior Hydrogeologist.

Several subcontractors may be used to complete the RI/FS work at the Site. These subcontractors include, but are not limited to D.L. Maher Company; TestAmerica Westfield; Lancaster Laboratories, Inc.; Dana Perkins; GeoSierra Environmental, Inc. and Waste Management, Inc. Subcontractor contact information is provided at the end of this section.

2.2 ROLES AND RESPONSIBILITIES

The following sections describe the roles and responsibilities of the key team members.

2.2.1 Olin Corporation

Site Team Leader

Garland Hilliard is the Olin Site Team Leader and is responsible for the overall management of Olin's responsibilities under the Agreement on Consent (AOC). He will hold the following roles and responsibilities:

- Responsible for leading activities designed to meet Olin's obligations under the AOC and SOW;
- Responsible for providing review and approval of deliverables prepared for submission to USEPA in fulfillment of the Olin's obligations under the AOC and SOW; and
- Responsible for communication of Olin project commitments to Olin Management.

Site Manager

Steve Morrow is the Olin SM for Wilmington and is responsible for managing the Wilmington Site on a daily basis. Mr. Morrow is the primary point of contact for communication to USEPA through James DiLorenzo, USEPA's Remedial Project Manager (RPM). He will hold the following roles and responsibilities:

- Responsible for communication to the USEPA RPM;
- Responsible for project communication to MACTEC, on-Site Olin personnel, and other Olin subcontractors;
- Responsible for providing review and approval of deliverables prepared for submission to USEPA in fulfillment of the Olin's obligations under the AOC and SOW;
- Primary point of contact for communication with USEPA and other project stakeholders and is responsible for transmitting project deliverables to USEPA, developing and communicating project schedules that concern Olin's project commitments to USEPA; and other communications as needed;
- Responsible for directing USEPA communications to Olin and MACTEC project teams;
- Responsible for supervising Olin's on-Site personnel and compliance of Site activities with applicable, local, state and federal regulations and requirements;
- Responsible for managing the scope and schedule of MACTEC obligations to Olin under the RI/FS project; and
- Acting as Olin's representative in public meetings and settings.

2.2.2 MACTEC Engineering and Consulting, Inc.

Project Manager

Peter Thompson will serve as MACTEC's PM for the RI/FS and is responsible for the overall execution of MACTEC's responsibilities in the Site project. The PM will hold the following roles and responsibilities:

- Responsible for the successful completion of MACTEC's overall project, while maintaining Safety as the number one priority;
- Responsible for and accountable to ensure that the SHSO has the authority to implement the HASP;
- Provide senior project management and oversight in directing and organizing project staff and activities to maintain project schedule and work quality, including performance and effectiveness of MACTEC employees assigned to the project;
- Provide senior project management for contract administration/management, inclusive of assuring contract compliance with contract specifications and MACTEC Policies and Directives;
- Be the primary point of contact with Olin for daily communication, review and approval of project deliverables with authority to resolve technical and/or other issues;
- Initiate and approve procurement of subcontractors working under MACTEC's direction;
- Employ effective people management skills to ensure completion of the project as scheduled, within budget, in a manner that protects the environment; and
- Other duties, as assigned.

Project Principal

Michael Murphy will serve as the Senior Project Principal for the RI/FS and is responsible for technical quality of project deliverables and for technical execution of the project. Mr. Murphy, in addition to Mr. Thompson, is responsible for verifying that the project deliverables meet or exceed MACTEC quality standards and procedures identified in the MACTEC Quality Assurance Manual, provided under separate cover to USEPA. The project principal will hold the following responsibilities:

- Provide senior technical guidance and direction to the project;
- Technical oversight of project deliverables during their preparation;
- Responsible for review and approval of MACTEC deliverables in conjunction with the PM;
- Responsible for technical direction of project staff under his direct supervision;

- Responsible for the technical quality of MACTEC project work and deliverables;
- Direct technical staff during preparation of technical deliverables and oversee review of other professionals to verify work is being completed by professionals with appropriate training and experience to competently complete work efforts;
- Direct technical scope of data collection activities to verify that data intended to be collected is sufficient, suitable, and appropriate for completion of risk assessment activities for the project;
- Provide senior technical support at meetings requested by USEPA; and
- Other duties as assigned.

Site Health and Safety Officer

Annette McLean will be MACTEC's SHSO, and she will be principally responsible for H&S and regulatory compliance. Ms. McLean will verify that all work is performed in a safe manner in accordance with MACTEC's HASP.

The SHSO shall have the qualifications and experience to recognize potential chemical safety problem areas in operations. The SHSO shall be capable of directing the surveillance activities of the H&S technicians and identifying field personnel, who on a daily basis will function as the Site H&S Supervisor. The Site H&S Supervisor may be the same individual as the FOL or another appropriately trained field person who is on-Site.

The SHSO will hold the following roles and responsibilities:

- Surveillance of investigation activities involving hazardous materials, including monitoring and surveys of areas in which hazardous materials may be present;
- Conduct training programs and otherwise instruct personnel in the proper procedures for the handling of hazardous material prior to use; at periodic intervals (refresher training), and as required by changes in procedures, equipment, and regulations, etc.;
- Immediately terminate any activity that could pose a threat to public, workers, or the environment;
- Develop and maintain training programs in accordance with 10 CFR Part 19.12;
- Develop and implement the Site-specific HASP;
- Ensure that all workers are monitoring for exposures to hazardous material, chemical compounds, and other hazards where appropriate;
- Review analytical and air monitoring data, as appropriate, with respect to potential exposures to Site workers and the public;
- Ensure that required qualifications and training are maintained current;

- Perform periodic safety inspections to ensure compliance with MACTEC, Olin, and regulatory requirements;
- Coordinate with and verify that the Site H&S Supervisor conducts daily safety meetings;
- Interface and freely communicate with project personnel for all aspects related to H&S Compliance;
- Primary interface with MACTEC's Regional and Corporate H&S Managers;
- Perform monthly and quarterly self-assessments if required by site activities;
- Verify on-Site subcontractors have reviewed and are aware of the requirements of MACTEC's Site HASP;
- Interface and freely communicate with project personnel for all aspects related to H&S Compliance; and
- Other duties, as assigned.

Project Quality Control and Quality Assurance Officer

Chris Ricardi will be MACTEC's Project QA/QC Officer and he will be principally responsible for QA/QC compliance activities related to analytical data acquisition, analysis, and validation. The QA/QC Officer will verify that work is performed in accordance with the QAPP, included in the Sampling and Analysis Plan (SAP).

The QA/QC officer will hold the following roles and responsibilities:

- Responsible for preparation and senior review of the QAPP;
- Responsible for coordinating or performing QA/QC audits in the field for compliance with the QAPP;
- Responsible for reporting to the Project Principal and PM any identified quality issues that have or could potentially affect quality and usability of environmental data;
- Responsible for developing corrective actions for any such conditions;
- Responsible for oversight and review of all data validation activities;
- Technical oversight of analytical programs;
- Technical oversight and communication with subcontract laboratories;
- Management of data validation tasks and final review and approval of data validation report; and
- Other duties, as assigned.

Field Operations Leader

Chris Mazzolini will be the FOL who will function as MACTEC's designated General Site Supervisor, and will principally be responsible for operational aspects of field investigation activities. Mr. Mazzolini functions as the on-site manager for field investigations and will hold the following roles and responsibilities:

- Responsible understanding and implementing this RI/FS work plan;
- Responsible for the daily oversight of the project field investigation and sampling activities, while maintaining Safety as the number one priority;
- Responsible for the effective scheduling and utilization of the on-site personnel and equipment to ensure completion of the work in accordance with the project schedule;
- Responsible for organizing and maintaining field investigation data records, logging and checking field notebooks, and verifying proper calibration of field instruments and equipment;
- Responsible for overseeing sample management and communication with project laboratories concerning the scheduling and delivery of environmental samples under appropriate chain of custody (COC);
- Responsible for assisting USEPA and its subcontractors or representatives in obtaining split samples;
- Responsible for documenting compliance with pertinent local, state and federal regulations, if applicable;
- Responsible for verifying the on-site personnel possesses the skills, project, and Site-specific training as required by the project work plan and HASP;
- Acts as MACTEC's on-site representative for management of MACTEC's subcontractors;
- Conduct meetings, as needed, with the on-site personnel to detail the daily work activities. Utilize the daily meetings as a means of obtaining feedback to discuss the progress, problems, comments, and status of project activities with the on-site staff and project management team;
- Provide daily/weekly status updates to the PM concerning project progress and performance;
- Accountable to the SHSO to assure that he/she has sufficient resources and authority to implement the HASP;
- Responsible for completing work in a manner that protects the environment; and
- Other duties, as assigned.

2.2.3 Geomega, Inc.

Geomega has provided consulting services to Olin on this project over the past decade and has principally been involved in hydrogeological investigations, groundwater modeling, and

investigation of the geochemistry of DAPL interactions in subsurface and surface water systems. Geomega will continue to support Olin in providing these technical services for the project.

Geomega Senior Geochemist

Andy Davis is a principal at Geomega, will serve as Geomega's senior geochemist for the RI/FS project and will contribute his technical expertise and oversight to interpretation of geochemical effects of potential remedial efforts at the Site related to DAPL constituents in the subsurface and in surface water. His input will assist evaluating effects of remedial alternatives and activities on mobility and fate of Site contaminants.

Geomega Senior Hydrogeologist

Christopher Dacey will serve as Geomega's senior hydrogeologist for the RI/FS project and will contribute his technical expertise and oversight to induction logging programs, other aspects of hydrogeologic characterization, statistics, and groundwater modeling efforts at the Site.

2.3 SUBCONTRACTORS

Olin will utilize several subcontractors, including but not limited to its primary environmental consultants, MACTEC and Geomega, to complete the RI/FS work at the Site, and Geo Sierra to conduct pulse inference testing for the Containment Area Slurry Wall. Other subcontractors include, but are not limited to the drilling, survey, and analytical laboratory subcontractors listed below. Depending on work activities, these subcontracts will be through Olin or MACTEC.

Consultants

MACTEC Engineering and Consulting, Inc.
107 Audubon Road, Suite 301
Wakefield, MA 01880
Phone: 781-245-6066

Geomega, Inc.
2995 Baseline Road, #202
Boulder, CO 80303
Phone: 303-443-9117

Geo Sierra Environmental, Inc.
An Affiliate of Panther Technologies, Inc.
220 Route 70 East, Suite D
Medford, New Jersey USA 08055
Phone: (609) 714-2420
Fax: (609) 714-2495

Drilling

D.L. Maher Company
A Division of Boart Longyear
71 Concord Street
North Reading, MA 01864
Phone: 781-933-3210

Surveyor

Dana F. Perkins, Inc.
1049 East Street
Tewksbury, MA 01876-1464
Phone: 978-858-0680

Laboratories

Test America Westfield
Westfield Executive Park
53 South Hampton Road
Westfield, MA 01085
Phone: 413-572-4000

Katahdin Analytical Services, Inc.
600 Technical Way
Scarborough, ME 04074
Phone: 207-874-2400

Lancaster Laboratories, Inc.
2425 New Holland Pike
Lancaster, PA 17605-2425
Phone: 717-656-2300

IDW Disposal

Waste Management Inc.
448 Lincoln Highway
Fair Hills, PA 19030
Phone: 215-269-2108

3.0 SITE ACCESS AND CONTROL

The following sections describe plans and procedures to obtain access to property not owned by Olin and control of access on the Olin Property.

3.1 ACCESS AGREEMENTS

This section identifies locations and owners of property where access agreements may be required to conduct field activities and describes the procedures for obtaining landowner approval for access to property not owned by Olin.

3.1.1 Properties Where Access May Be Required

Since the Site extends beyond the Olin Property, it will be necessary to access adjoining off-Property areas during RI investigation activities. Off-Property access to sample surface waters (OU2) and groundwater (OU3) will be required on private and town properties. In addition, access to the East Ditch within the MBTA commuter rail right of way will require an access license and railroad safety training. Only those individuals having completed the railroad safety training will be allowed access to MBTA property along the East Ditch. Figure 3.1-1 shows the well locations, and parcels which may be required for access to conduct sampling for OU2 and OU3. In the past, Olin has installed monitoring wells outside of the 51 Eames Street Property, and it will be necessary to return to a number of these locations to collect environmental samples and measurements. In addition, additional monitoring well installations are proposed in the SAP to further define the extent of groundwater impacts. The parcel boundary lines shown in Figure 3.1-1 are identified by the Town of Wilmington Board of Assessors and the City of Woburn Board of Assessors. A preliminary list of parcels and property owners is included as Table 3.1-1. This table identifies owners who may potentially be contacted to request access.

3.1.2 Process for Obtaining Access Agreements

Olin will begin a process to obtain access agreements after approval of the Draft RI/FS Work Plan. Olin will first identify and confirm where permission to access off-Site private or public property is needed to execute the proposed remedial investigations and then develop an address database. An introduction letter requesting access will be prepared by Olin and sent via registered mail to the property owner(s). The letter will inform the property owner of the planned RI/FS activities, describe the nature and anticipated duration of the planned work during the RI/FS, 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. The letter will request that access also be granted to USEPA and its contractors for the duration of the RI/FS. The letter will include a pre-addressed postage paid return letter in the form of an access agreement. The USEPA will be kept informed of access-related issues, should they arise.

Prior to sampling activities, certified letters will be sent to property owners identified in Table 3.1-1 and shown on Figure 3.1-1 for which access is needed. If a response to the certified mailing to the property owners is not received by Olin, follow-up actions will include an attempt to contact the owner with a telephone call, and if unsuccessful, an attempt to contact the owner in person will be made.

In the event that Olin fails to obtain an access agreement, Olin will notify the USEPA in writing. The notification will include a description of the efforts made to obtain the necessary access and the reason for the lack of success. USEPA may then assist in obtaining access or approve alternative sampling locations.

When actual work is to be performed at a given property, written notice to the property owner will be provided at least fourteen days in advance of the required work.

Olin has obtained and filed an application from the MBTA for a license to access the MBTA right of way along the East Ditch to collect surface water and sediment samples for both OU2 and the Plant B IRSWP-related activities. The application is currently under mutual review and negotiation by MBTA and Olin and is progressing toward attainment of an agreement with the terms and conditions appropriate for the proposed activities. Olin will keep USEPA informed as to the progress of that agreement. When the license application is approved, the expected schedule for completion of required safety training will be established.

3.2 ACCESS CONTROL ON THE OLIN PROPERTY DURING SITE INVESTIGATION ACTIVITIES

The point of entry to the Property is through a gate on Eames Street which is locked when Olin employees are not on the Property. The entire Olin Property is enclosed by an eight-foot high chain-linked fence. The perimeter fence has four additional locked gates: one located east of Plant B, a second located on the west side adjacent to the South Ditch Weir, a third located in the

south west corner to access the CSL, and a fourth located at the southeastern corner of the Property adjacent to the South Ditch. Access gate locations are shown on Figure 1.0-2.

3.2.1 Site Office Trailer

In 2006, Olin installed a 40-foot office trailer near Plant B for use by the Olin employees who operate Plant B and maintain the Property. The office trailer will be established as the headquarters for the Olin field program activities at the Site. The field office has electrical power, telephone communication, lavatory facilities, space and equipment for storage of field project files, and an area to hold meetings. Depending on the needs of the field work, the office may contain computer(s), printer(s), fax machine, and photocopier.

All visitors to the Property must sign in upon arrival at the office trailer. A log-in book is maintained in the office trailer.

3.2.2 Site Security

Property access is controlled along the entire Property perimeter by an eight-foot high fence. All access gates are locked when Olin employees are not on the Property. The main access gate has an electric eye sensor which signals the office and Plant B when a vehicle passes through the gate during weekdays, when the gate is open. Access to the office trailer is around the east side of the former office building through a man-gate in an interior fence that is located between the former office building and the perimeter fence. This gate is also equipped with an electric eye sensor that alerts Olin's employees if a visitor is entering the Property. Signage directs visitors to check in at the office trailer. Any person coming on site will be required to read the Olin Site Health and Safety Plan and sign that they have read the document.

When RI/FS activities are conducted at the Site outside of the fenced area or at any off-Property locations, access to these areas will be allowed to only authorized representatives of Olin, USEPA, and MassDEP. In addition, the required use of appropriate precautions such as barricades, flagging, and/or warning signs is included in the HASP to restrict unauthorized entry to potentially hazardous areas, such as the vicinity of drilling rigs when work is being conducted.

3.2.2.1 Government Property

On-Property storage space for government property will be provided in the former guard shack or within the locked butler building, if USEPA desires such accommodations. Both buildings will be locked and only authorized personnel will have access to these secured buildings.

3.2.2.2 Prevention of Unauthorized Access

All access gates are locked when Olin employees are not on the Property. An electronic eye has been installed to monitor activity at the main access gate and the man-gate near the office trailer. An audible alert sounds in the office trailer to alert Olin personnel when someone passes through these gates.

3.3 DECONTAMINATION AREAS AND DRUM STAGING AREAS

This section outlines the process for use of temporary decontamination pads or locations and the specific locations for staging of drums for soils and liquids that are collected as Investigation Derived Wastes (IDW). The assessment and management of IDW is discussed in Section 4. Specific equipment decontamination procedures are discussed in the SAP. Borings and wells will be installed by a rotasonic drilling rig at outside locations. Direct push sampling equipment will be utilized inside buildings.

3.3.1 Equipment Decontamination Areas

Site investigation activities requiring the use of drilling equipment are proposed for the on-Property areas and include completion of shallow soil borings by sonic drilling methods. At off-Property locations, sonic drilling methods will be used to install additional groundwater monitoring wells, including shallower bedrock wells (100 feet into rock). This drilling method does not generate significant amounts of IDW materials. Deeper bedrock wells will be drilled by air hammer or other drilling methods. Air hammer drilling methods may generate large water returns in areas where bedrock is capable of producing such quantities of water. During work off-site, decontamination of drilling equipment will occur at a temporary decontamination pad constructed at each drill location prior to moving to the next drilling location. For on-Property drill locations, decontamination will occur at a temporary decontamination pad constructed specifically for the OU1 investigation program. The decontamination methods include removal of soil material by using hand tools and/or a brush with water and a phosphate free detergent such as Liquinox as needed, and use of a high pressure sprayer for cleaning drilling rods, bits, and sampling equipment that are exposed to subsurface conditions. The back of the drilling rig will

be sprayed with a high pressure washer to remove loose soil material, if needed. The decontamination fluids from on-site operations will be containerized on the Olin Property for disposal characterization.

For off-Property drill locations, the decontamination waters generated from cleaning of down-hole equipment (drill rods, bits, and sampling equipment), will be containerized, and transported back to the 51 Eames Street Property and staged as discussed below. Wash waters generated by spraying the back of the rig, will also be containerized. Soil material will be drummed and staged as discussed below.

Both well development waters and purge waters from well sampling will be containerized, transported to, and stored in the Drum Staging Area. The Drilling subcontractor will be responsible for containerizing decontamination and well development waters and transporting them to the Drum Staging Area. MACTEC will be responsible for containerizing well sampling purge waters and transporting them to the Drum Staging Area.

3.3.2 Drilling Fluids and Cuttings

Soil borings drilled on-Property will be completed to a depth greater than ten feet. Drilling waters, which should be minimal in volume, will be containerized. After sample collection, remaining drill cuttings will be containerized in 55-gallon Department of Transportation (DOT) approved drums and labeled to identify which boring cuttings each drum contains. The drilling subcontractor will be responsible for drumming soil cuttings and transporting them to the Drum Staging Area.

Monitoring wells drilled off-Property (except those installed for the off-Property West Ditch [off-PWD] Pilot Test) will be located at down gradient locations and are expected to be free of Site impacts. Soil cuttings from these explorations will be containerized in 55-gallon DOT-approved drums, labeled accordingly, and transported back to the 51 Eames Street Property for management as described in Section 4. Drilling fluids and well development waters will be containerized and transported to the Olin property. The drilling subcontractor will be responsible for drumming soil cuttings and containerizing drill and decontamination waters and transporting them to the Drum Staging Area.

3.3.3 Drum Staging Area

All soil IDW derived from soil borings and monitoring well installations will be drummed and staged on the loading dock at the on-Property East Warehouse. These drums will be stored on pallets, and the soil materials will be assumed to be non-hazardous until such time as analytical data demonstrate otherwise. Soil analytical results from RI samples collected from the on-Property soil borings will be used to evaluate whether drummed soils are potentially hazardous or non-hazardous soil materials. The drilling subcontractor will be responsible for drumming soil cuttings and transporting them to the Drum Staging Area and placing them at the direction of Olin. Olin will be responsible for management and inspection of the Drum Storage Area.

Soils determined to be hazardous waste will be manifested and sent off-Site for disposal at a facility permitted to accept such material. Olin may elect to manage soil that has been determined to be non-hazardous material at an off-Site facility permitted to accept such material, or add this material to its on-Property soil for re-use stockpile with approval from USEPA.

Depending on the volume of water generated during well installations, the drum Storage Area may also contain a bulk storage tank (or fractional tank) for containerizing drilling waters and drill rig decontamination IDW. These waters will be stored in the tank until it is characterized for disposal. Otherwise such waters will be placed in drums 55 gallon plastic DOT- approved drums staged on the loading platform. Purge water IDW from groundwater sampling will be transported to the Drum Staging Area by MACTEC and placed in 55 gallon plastic DOT- approved drums staged on the loading platform until characterized.

3.4 TEMPORARY WORK EXCLUSION ZONES

As part of the site control program included in the HASP, temporary work exclusion zones will be established at investigation locations, as appropriate for the investigation activity. The Property has been extensively investigated, and the need for formal exclusion zones and support zones adjacent to work areas is not expected. If such an exclusion zone is needed based on site conditions encountered when investigations occur, work will be stopped in accordance with the HASP, and work exclusion zones, decontamination zones, and support zones will be established. Temporary work exclusion zones will be established around the immediate area where work is being conducted involving heavy equipment and overhead hazards. Stakes and flags will be set up around drill rigs, overhead zones, etc. as necessary during work activities to designate the temporary exclusion zone. Additional details are contained in the HASP.

4.0 MATERIAL CONTROL AND CONTINGENCY PLANS

Management of IDW will be in accordance with the USEPA memorandum “Guide to Management of Investigation Derived Wastes” (USEPA, 1992). Drill cuttings and drilling fluids will be drummed or otherwise containerized and labeled in accordance with DOT requirements and transported to the 51 Eames Street Property for temporary storage pending laboratory analysis of the soil and a determination for its final disposition. D.L. Maher, a division of Boart Longyear will be responsible for drumming any soil and water IDW and transporting such materials to the Property and the staging area at the warehouse. Olin will be responsible for proper disposal and management of the stored materials.

4.1 NON HAZARDOUS MATERIAL DISPOSAL

IDW generated during the RI/FS may include:

- soils;
- groundwater;
- debris; and
- other materials
 - personal protective equipment (PPE)
 - sampling equipment
 - plastic sheeting, containers, etc.
 - hand wash waters

The management of these wastes will be conducted to limit exposure of Site personnel to hazardous materials and to prevent introduction of contaminated materials to uncontaminated environmental media at the Site (groundwater, soils). The following describes protocols for testing, storage, and disposal of these materials.

IDW will be managed to limit the potential for release of contaminated materials to the environment. Spoils generated during the RI/FS may include, but are not limited to: soil cuttings and drilling fluids from soil boring advancement; water from well development, well purging and sampling, and equipment decontamination; and PPE. IDW shall be segregated by type to facilitate characterization and disposal of the materials.

PPE, including Tyvek® suits, gloves, paper towels, plastic sheeting, and disposable sampling equipment will be double bagged in standard garbage bags and disposed as municipal solid waste. If any sheeting or sampling equipment is obviously contaminated, (with LNAPL, for example) it will be decontaminated by thorough cleaning, or it will be managed as hazardous material.

In general, all IDW identified as potentially contaminated with hazardous materials will be stored in a designated and clearly marked IDW management area in the East Warehouse (see Figure 1.0-2). All drummed material will be stored on wooden pallets and will also be clearly labeled to indicate the source of the IDW and dates collected. The IDW storage area at the East Warehouse will be inspected regularly by Olin personnel to ensure that proper storage procedures are being followed. Potentially contaminated IDW will be identified based on its origin, olfactory and visual evidence, and laboratory results. Additional sampling and laboratory testing specific to each drum may be required to determine the proper disposition of these IDW.

4.2 MANIFESTING AND DISPOSAL OF HAZARDOUS MATERIALS

Contaminated IDW will be stored on-Property until properly disposed. IDW will be shipped to a licensed disposal facility following any further required waste characterization or stabilization requirements. All hazardous substances, pollutants, or contaminants transferred off-Site for treatment, storage, or disposal will be transferred in compliance with appropriate regulations. Such a transfer will only occur after approval by the USEPA, as required in the AOC.

4.3 CONTINGENCY NOTIFICATION PLAN

The Site has been thoroughly characterized, and the potential for unidentified hazardous conditions is considered low. A Site-specific Contingency Plan for potentially hazardous RI/FS activities is described in Section 7 of the HASP. Prior to conducting on-Site activities during the RI/FS that have potential to create hazardous conditions, Olin will coordinate such work with federal, state, and local authorities as necessary to protect the H&S of on-Site workers and area workers and residents that might be affected by those particular activities. The USEPA, MassDEP, and the Town of Wilmington Police and Fire Departments will be informed prior to starting such activities so that they will be properly coordinated. Activities of this nature are not anticipated at this time.

Upon the occurrence of any event during the work that causes or threatens any release of waste material from the Site into the environment or that may present an immediate threat the public

health, welfare, or the environment, Olin will take appropriate action to prevent, abate, or minimize such release or endangerment caused or threatened by the release. Olin will also immediately notify the USEPA RPM, or in the event of the RPM's unavailability, shall notify the Regional Duty Officer of the Emergency Planning and Response Branch, USEPA Region 1 (telephone (617) 918-1236) of the incident or Site conditions. MACTEC employees shall act in accordance with applicable provisions of the HASP in responding to such events. Telephone numbers for contact requiring notification are listed in the table that follows.

If the release involved a hazardous substance, Olin shall immediately notify the USEPA RPM, or in the event of the USEPA RPM's unavailability, shall also contact the Regional Duty Officer of the Emergency Planning and Response Branch at (617) 918-1236 and the National Response Center at (800) 424-8802.

Olin shall submit a written report to the USEPA within seven days after each such release setting forth: (i) the events that occurred; (ii) the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release; and (iii) the measures taken or to be taken to prevent the recurrence of such a release, and as otherwise described in Section 39.a and 39.b of the AOC.

Organization	Contact Person	Contact Number
Emergency Planning and Response Branch, USEPA Region 1	Regional Duty Officer	617-918-1236
USEPA	James DiLorenzo	617-918-1247
MassDEP	Joseph Coyne	617-348-4066
MassDEP Spill Number	MassDEP	888-304-1133
Board of Health Town of Wilmington	Town Office	978-658-4298
Fire Department Town of Wilmington	Town Office	Emergency: 911 Non-Emergency: 978-694-2006
Police Department Town of Wilmington	Town Office	Emergency: 911 or 978-658-3331 Non-Emergency: 978-658-5071
Wilmington Conservation Commission	Town Office	978-694-2024
Board of Health Town of Woburn	Town Office	781-932-4407
Fire Department Town of Woburn	Town Office	Emergency: 911 or 781-933-3131 Non-Emergency: 781-932-4580

4.4 CONTINGENCY PLAN FOR AIR MONITORING

Air monitoring other than monitoring of personnel breathing zones at drilling locations is not required. Planned RI/FS activities that would result in a release of fugitive emissions are not anticipated. If an activity is identified that could result in a level of fugitive emissions requiring a specific monitoring program, an air monitoring plan will be developed for that specific activity.

5.0 DATA MANAGEMENT PLAN

This subsection provides a description of the Project Database system and summarizes the general procedures for handling media-specific sampling and analytical results obtained before and during the RI/FS. Additional detailed and specific information regarding the data documentation, records, management, and validation is provided in the Section 15 of the QAPP.

5.1 DATA MANAGEMENT PROCEDURES

The greatest amount of data will be generated through the chemical analysis of field samples. The majority of the chemical analyses will be completed at off-Site laboratories, although some samples will be analyzed on-Site.

Off-Site laboratory chemical data will be sent to the data manager as an Electronic Data Deliverable (EDD) via email. The EDD will be in an EQUIS EZ format to expedite the process of uploading data. After validation is complete, as described in Section 15 of the QAPP, the EDD will be uploaded to Project Database. Any changes which occurred during validation will be incorporated into the upload of the EDD, and the record of the original laboratory qualifiers will be preserved. Once the data are loaded into the project database, a report is printed which will be compared to the validated hard copy of the lab report to ensure all data were correctly uploaded to the project database. The validated hard copy lab report will be retained in the MACTEC project files.

Data collected in the field during sample collection activities (e.g., pH, water level data) will be recorded on field data records (FDRs). Upon completion of field activities, the FDRs will be provided to the project data manager for data entry into the Microsoft® Access™ Project Database. Data entry will be limited to those parameters which need to be compiled for later evaluation in the RI/FS.

5.1.1 Sample Initiation and Tracking

MACTEC may use one of two different procedures for sample tracking depending on the nature of the field sampling activities. Both sample tracking processes have been developed to ensure that each sample is accounted for at all times. This process will track the sample from the time it is collected to the time the data associated with the sample have been uploaded into the Project Database. For routine sampling programs, such as repeated groundwater monitoring events,

MACTEC will provide a list of samples identification numbers and analytical methods to TestAmerica, who in turn will prepare sample labels and deliver labeled bottles to the Site. Upon completion of sampling, a COC is filled out which initiates the sample tracking procedure.

The following steps are taken in this process:

- Upon completion of the field program the field staff will give copies of all COCs to the data manager.
- The data manager will enter into the sample tracking database the following: sampling program, sample identification, date sampled, time sampled, sample type, matrix, laboratory shipped to, date shipped to lab and analyses requested.
- The data manager will enter the date on which the EDD was received from the lab. The data validator will enter the date on which the hard copy report was received from the lab.
- The data manager will enter the date the validation memo is completed both electronically and in hard copy.
- The data manager will enter the date the sample data are uploaded to the Project Database.
- The data manager will enter the date the Project Database is posted for the use of the project team.

MACTEC has also developed an electronic sample tracking system called Sample Track which was designed to interface the Project Database. Sample Track is a Microsoft® Access™ program that electronically initiates a Sample COC record as sample location and sample analysis information is entered. Once the sample identification, media, and analysis fields are entered, the program is used to generate sample labels for field samples. When the samples are collected and returned to the field office, they are checked into Sample Track by entering sample date, time, sample depth, sampler name, and related information. When the samples are to be sent to the laboratory, an electronic COC is generated and printed and the samples are shipped or delivered to the laboratory. When the laboratory EDD is received, it is checked electronically against the Sample Track COC record to verify that all samples were analyzed for the requested methods. After this point, sample management follows procedures specified in Section 15 of the QAPP and in the bullets located prior to this paragraph.

5.1.2 Data Quality Assessment

As defined by USEPA, the DQO's process is "the process used to establish performance and acceptance criteria, which serve as the basis for designing a plan for collecting data of sufficient

quality and quantity to support the goals of the study” (USEPA, 2006). Environmental data that are subsequently collected are evaluated to understand whether they are of sufficient quality to support the evaluation objectives of the study. This process includes but is not limited to identification and documentation of appropriate sampling procedures, analytical methods, and detection limit criteria for chemical data; frequency of analyses and QA/QC criteria for QC samples; and validation and QA/QC criteria for acceptance or qualification of that data.

Chemical data will be used to assess soil, groundwater, surface water, and sediment quality. In the future, these data will be used to support contaminant assessments in the RI report and the risk characterization for media with completed exposure pathways including surface water and sediment. Data Quality Assessment for chemical and other data is discussed in the QAPP. The following QAPP sections address Data Quality Assessment: Project Quality Objectives and Measure Performance Criteria for chemical data (Section 7), Sampling Procedures and Requirements (Section 9), Sample Handling and Tracking (Section 10), Field and Laboratory Analytical Methods (Sections 11 and 12), Quality Control (Section 13), Data Documentation, Records and Management (Section 15), and Data Assessment (Section 16).

In the RI report, a comprehensive data quality assessment and data usability report will be presented to guide the use of the collected environmental data. Quality management reports are discussed in Sections 18, 19 and 20 of the QAPP.

5.1.3 Data Control, Accuracy and Security

Chemical data will be collected, documented, analyzed, and validated in accordance with the requirements established in the QAPP as discussed in the previous subsection. Data validation procedures described in the QAPP are consistent with the requirements of the USEPA Region 1 data validation guidelines. The Project Database is controlled and secure and only specifically trained and approved database managers are allowed live access to the database. All database entries are independently checked to confirm accuracy with the results reported by the laboratory. The methods and processes for updating, validating, and confirming data in the database are described in Section 15.5 of the QAPP.

5.2 OLIN PROJECT DATABASE

This section generally describes the Project Database used for maintaining project data and data management process. As indicated previously, additional procedural information is provided in the QAPP.

5.2.1 Database Description

A standardized database was constructed many years ago using Microsoft® Access™ to store, query, and report historical project data and has undergone several phases of verification against original hardcopy laboratory data deliverables. This database houses information for sampling locations, water levels, field samples, and analytical data and was used to develop tables and supporting figures for the Draft FRI (MACTEC, 2007a). The size of this Microsoft® Access™ data base has grown to the point of where it has approached practical computing limitations inherent to Microsoft® Access™. In anticipation of the additional data to be collected under the RI/FS, the Microsoft® Access™ data base has been migrated to MACTEC's proprietary Technical Environmental Database (TED) housed on a dedicated and redundant sample quantitation limit (SQL) Server located in Portland, Maine. All data records in the Olin Access database are preserved in TED. TED is backed up nightly and allows for database functions not available in the former Project Database that will be needed to comply with data reporting requirements listed in the SOW, such as generating data validation action reports that compare laboratory qualifiers to final validated data qualifiers. In addition, TED will more efficiently facilitate future data uploads to the Olin USEPA data hosting website.

The Microsoft® Access™ database was organized into key tables: WellBoringDetails, WaterLevelData, LaboratorySamples, ChemicalData and ChemicalDataBlanks with the following supporting tables: SampleTypes, MatrixTypes and ParameterList. The WellBoringDetails table contains information for the sampling locations at the facility. The WaterLevelData contains water level measurements. The LaboratorySamples table contains information for field samples collected for the project. The ChemicalData and ChemicalDataBlanks tables contain the analytical data associated with the field samples and QC samples, respectively. The supporting tables consist of valid values for sample types, matrix types and parameter names. The TED is similar in structure to the Microsoft® Access™ database but allows for an increased number of fields in the sample collection, sample analysis, sample analysis results, field parameters, and chemical abstract system tables.

The Project Database is the primary tool for storage of historical data, and will also serve as a comprehensive platform for housing future data. The database structure will also support the data extraction, calculations and reporting necessary for the risk assessment process.

The TED database receives input directly from laboratory EDDs in the EQUIS EZ format for ease of data transfer and to avoid mistakes in data transcription (into the unvalidated data table). The EDD output format is provided by analytical laboratories from their Laboratory Information Management Software (LIMS) systems, thereby eliminating the need for manual transcription and/or reformatting.

Data validation procedures and quality measures taken during the database population process are discussed in Section 15 of the QAPP. Upon completion of data validation, the data are corrected for valid values and validation updates. The data then undergo a secondary verification against the validation report. When the secondary verification is complete, the data are uploaded to the validated data table of the Project Database.

5.3 DATA ORGANIZATION, ANALYSIS AND PRESENTATION

For all reports using site-specific chemical data, the database queries are all generated directly from the Project Database by the database manager. The Project Database data have already undergone data validation, and the accuracy of those data has already been checked and verified as it is entered and accepted as final data in the database. Analysis of the data for interpretation purposes is conducted by qualified individuals. All tables and figures for reports are reviewed by the preparer and the professional assigned to check the figure or table for accuracy against original source data.

MACTEC uses many different commonly used software applications for data presentation including Microsoft® Word, Microsoft® PowerPoint®, Microsoft® Excel® and other products in graphics design and computer aided design. Two specific applications are described below that are most commonly used for data interpretation and presentation. These include Environmental Systems Research Institute (ESRI) ArcMap Geographic Information Systems (GIS) and Tecplot software for three-dimensional (3-D) visualization.

5.3.1 Geographic Information System

Implementation of ESRI ArcMap is through multiple licenses allowing professional staff to take advantage of this tool for data analysis and presentation. MACTEC has a GIS manager who helps to develop and modify GIS project applications. For this project, a read-only copy of the database is used by the ESRI application to develop chemical distribution figures for reports. These figures are prepared from the same data source as tables used in reports. Results posted on figures are spot checked against tables to verify accuracy.

5.3.2 Three-Dimensional Data Visualization

Tecplot is a 3-D design software used in the aeronautics industry for fluid dynamic evaluations. The software has extensive capabilities in rendering data located in a 3-D matrix with known x, y, and z coordinates. Tecplot is used for the Olin Site to render 3-D visualizations. Data for these visualizations are based on survey information, surface interpretations, and chemical and cell construction information.

6.0 FINANCIAL REPORTS FOR RI/FS ACTIVITIES

On a requested basis, Olin will provide to USEPA total cost incurred for RI/FS activities over the requested period.

7.0 COMMUNITY RELATIONS SUPPORT PLAN

7.1 INTRODUCTION

As specified in the 2007 SOW, USEPA, in coordination with the MassDEP, shall prepare a Community Relations Plan (CRP) to describe community relations activities during the RI/FS process. This CRSP has been developed consistent with Section 2 part II.F.4 of the Statement of Work, Remedial Investigation and Feasibility Study, Olin Chemical Superfund Site (USEPA, 2007), which requires the Respondents to support USEPA's community relation efforts. The purpose of this CRSP is to affirm and describe anticipated support from Olin for the community relations efforts by USEPA. This CRSP provides a written understanding and commitment of how Olin will support the USEPA's CRP at the Site.

The areas of support are identified in the following four subsections.

7.2 MEETING PARTICIPATION AND PRESENTATIONS

Olin will participate in and present information at public meetings at the request of USEPA. The purpose of these meetings will be to help residents and other stakeholders understand highly technical laws related to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and scientific concepts pertinent to the Site and to present updates on the status of the RI/FS. USEPA may hold such public meetings during the initiation, conduct and completion of the RI/FS. Support for such meetings may include:

- Preparing and making presentations
- Preparing visual aids, such as Site figures
- Participating in meetings

When requested by USEPA, Olin or its consultants on behalf of Olin, may make oral presentations and assist USEPA in explaining technical data and information. USEPA shall be responsible for developing the agenda and outline for such meetings, delivering opening remarks and presentations, and maintaining meeting minutes.

7.3 FACT SHEETS AND UPDATES

As requested by the USEPA, Olin will provide assistance in publishing and copying fact sheets and updates to stakeholder parties. The purpose of fact sheets and updates is to help residents and

other stakeholders better understand highly technical laws, concepts and information during the RI/FS Process.

It shall be USEPA's responsibility to prepare the fact sheets or updates and if USEPA requests Olin to review these documents, Olin will provide technical input. If USEPA requests Olin to assist publishing and copying fact sheets, it is assumed that USEPA will provide Olin with a final camera ready copy of the fact sheet text in Adobe® PDF format.

7.4 MAILING LISTS

Olin will assist USEPA in developing and maintaining mailing lists to which fact sheets and updates would be distributed by USEPA. This assistance would include consultations with USEPA to help identify residences and properties in proximity to the Site which would be included within a mailing list. Olin will use its prior mailing lists as a means to create the initial mailing list. Periodically, at the request of USEPA, Olin or its consultant will contact the town tax assessor or postmaster general to resolve undeliverable mail addresses. To the extent necessary to contact residents and stakeholders for whom contact information is in doubt, mailings will be addressed to "Resident" at the listed street address. The mailing address list will be maintained in an electronic format that can be used with mail merge functions in database and word processing programs to generate address labels.

7.5 RESPONSIVENESS SUMMARIES

The National Contingency Plan (NCP) under 40CFR 300.430(f)(3)(F) requires that a responsiveness summary be prepared following the 30-day comment period on the Proposed Plan (PP) and requires that the responsiveness summary be made available as a stand alone document for public distribution with the Record of Decision (ROD). Although not specifically required by the NCP, responsiveness summaries may also be prepared following the official public comment periods on the RI/FS. The purpose of the responsiveness summary is to provide a comprehensive and thorough response to all major comments and concerns raised by the community in writing. The responsiveness summary is typically prepared by the lead agency (USEPA) and includes discussion of both technical and legal issues pertinent to its response to public comments.

As requested by USEPA, Olin will assist USEPA in preparing responsiveness summaries to public questions and concerns originating during the during the 30-day public comment period on the RI/FS Reports and Plans. USEPA does not have an obligation to consider comments

originating before or after the official comment period but may elect to do so. Olin will also assist addressing such comments if requested by USEPA.

8.0 REFERENCES

MACTEC Engineering and Consulting, Inc. (MACTEC), October, 2007a. Draft Focused Remedial Investigation Report, Olin Chemical Superfund Site, 51 Eames Street, Wilmington, Massachusetts.

MACTEC, July, 2007b. Draft Interim Response Steps Work Plan, Olin Chemical Superfund Site, 51 Eames Street, Wilmington, Massachusetts.

United States Environmental Protection Agency (USEPA), June, 2007. Statement of Work, Remedial Investigation and Feasibility Study, Olin Chemical Superfund Site.

USEPA, February 2006. Guidance on Systematic Planning Using the Data Quality Objectives Process, Office of Environmental Information, EPA/240/B-06/001.

USEPA, 1992. Guide to Management of Investigation-Derived Wastes. OSWER 9345.3-03FS.

TABLES

**Table 2-1
Project Team Contact Information**

**Site Management Plan
Olin Chemical Superfund Site
Wilmington, Massachusetts**

Person	Organization	Contact Information
James DiLorenzo	USEPA	Office of Site Remediation and Restoration 1 Congress Street, Suite 1100 (HBO) Boston, MA 02114-2023 617-918-1247
Joseph Coyne	MassDEP	One Winter Street Boston, MA 02108 617-348-4066
Steve Morrow	Olin Corporation	3855 North Ocoee Street, Suite 200 Cleveland, TN 37312 423-336-4511
Garland Hilliard	Olin Corporation	3855 North Ocoee Street, Suite 200 Cleveland, TN 37312 423-336-4479
Peter Thompson	MACTEC (Shipping)	511 Congress Street Portland, ME 04101
	(Postal)	P.O. Box 7050 Portland, ME 04112-7050 207-828-3490
Michael Murphy	MACTEC	107 Audubon Road Building 2, Suite 301 Wakefield, MA 01880 781-213-5600
Annette McLean	MACTEC	107 Audubon Road Building 2, Suite 301 Wakefield, MA 01880 781-213-5608
Chris Ricardi	MACTEC (Shipping)	511 Congress Street Portland, ME 04101
	(Postal)	P.O. Box 7050 Portland, ME 04112-7050 207-828-3694
Chris Mazzolini	MACTEC	107 Audubon Road Building 2, Suite 301 Wakefield, MA 01880 781-213-5607

Prepared by/Date: PHT 10/2/2008
Checked by/Date: MH 10/3/2008

**Table 3.1-1
List of Properties Where Property Access May Be Required**

**Site Management Plan
Olin Chemical Superfund Site
Wilmington, Massachusetts**

Map/Lot	Property Owner	Town
Map 02 Lot 7E	David Marshall	Wilmington
Map 14 Lot 2B	James Magee	Wilmington
Map 14 Lot 6	Town of Wilmington	Wilmington
Map 15 Lot 2C	Gary Molgard	Wilmington
Map 24 Lot 116	Adam Paszak	Wilmington
Map 24 Lot 117	Paul Cook	Wilmington
Map 24 Lot 121	Boston Maine RR C/O Guilford Trans IND INC	Wilmington
Map 24 Lot 205	Hidden Jewell LLC	Wilmington
Map 24 Lot 206	Janis Realty Trust	Wilmington
Map 24 Lot 207	4 Jewell Dr LLC	Wilmington
Map 24 Lot 208	Jul-Jak Inc	Wilmington
Map 24 Lot 208B	10 Jewell LLC	Wilmington
Map 24 Lot 209A	14 Jewell LLC	Wilmington
Map 24 Lot 31A	David Morton TR	Wilmington
Map 24 Lot 31C	Evergreen Realty	Wilmington
Map 24 Lot 31D	Eames & Main St Realty	Wilmington
Map 24 Lot 33A	Adele Spellenberg TR	Wilmington
Map 24 Lot 54	Lisa Stanley	Wilmington
Map 24 Lot 63	Dana Speranza	Wilmington
Map 24 Lot 64	Paul Trites	Wilmington
Map 24 Lot 65	Brian Syring	Wilmington
Map 24 Lot 66	Stevan Kruse	Wilmington
Map 24 Lot 72A	Frank Ingram	Wilmington
Map 24 Lot 74	Brian Syring	Wilmington
Map 24 Lot 87	Roger Lessard	Wilmington
Map 24 Lot 94	Michael Oley	Wilmington
Map 25 Lot 10	Kevin Berrigan	Wilmington
Map 25 Lot 11	Sammy Lafollette	Wilmington
Map 25 Lot 12	Rita Macinnis	Wilmington
Map 25 Lot 13	John Amicangioli	Wilmington
Map 25 Lot 2	Robert Buckley TRS	Wilmington
Map 25 Lot 3	Raymond Lepore	Wilmington
Map 25 Lot 4	Robert Autenzio JR	Wilmington
Map 25 Lot 5	Jonathan Larock	Wilmington
Map 25 Lot 6	Michael Tkachuk	Wilmington
Map 25 Lot 7	Charles Spinazola	Wilmington
Map 25 Lot 8	Angelina Covelle L.E.	Wilmington
Map 25 Lot 9	Theresa Clements	Wilmington
Map 26 Lot 2	Paul Bimbo	Wilmington
Map 26 Lot 3	Kenneth Perry	Wilmington
Map 26 Lot 4	Sean Brennan	Wilmington
Map 26 Lot 5	Michael Tkachuk	Wilmington
Map 26 Lot 6	John Spinazola	Wilmington
Map 26 Lot 7A	Keith McConnell	Wilmington
Map 26 Lot 7B	Keith McConnell	Wilmington
Map 26 Lot 7C	Robert Dillon LE	Wilmington
Map 26 Lot 9	Town of Wilmington	Wilmington
Map 27 Lot 11D	Middlesex Canal Assoc Inc	Wilmington
Map 27 Lot 11E	Town of Wilmington	Wilmington
Map 27 Lot 13	Town of Wilmington	Wilmington
Map 27 Lot 14	Walter Malatesta	Wilmington
Map 27 Lot 14C	Daniel Sarno	Wilmington
Map 27 Lot 14F	Robert Berg Jr	Wilmington
Map 27 Lot 17H	Carl Crupi	Wilmington
Map 27 Lot 17K	Steven Wingate	Wilmington
Map 37 Lot 1	New England Resins Pigments Corp	Wilmington

**Table 3.1-1
List of Properties Where Property Access May Be Required**

**Site Management Plan
Olin Chemical Superfund Site
Wilmington, Massachusetts**

Map/Lot	Property Owner	Town
Map 37 Lot 3	Woburn St. Assoc LLC	Wilmington
Map 37 Lot 4	E C Whitney & Son	Wilmington
Map 37 Lot 4A	E C Whitney & Son	Wilmington
Map 37 Lot 5	Hamun/G&W Realty	Wilmington
Map 37 Lot 6	Dawson-MacDonald Realty	Wilmington
Map 37 Lot 7	Analog Devices	Wilmington
Map 37 Lot 9B	Bottling Group LLC	Wilmington
Map 38 Lot 1	Koch Membrane Sys Inc	Wilmington
Map 38 Lot 2	880 Main St LLC Bulldog Realty Trust C/O Stephen Karen Keohan TRS	Wilmington
Map 38 Lot 3	United Tool Die CO INC	Wilmington
Map 39 Lot 9	Town of Wilmington	Wilmington
Map 39 Lot 11A	U Haul Real Estate CO Property Tax Dept	Wilmington
Map 48 Lot 73A	AVCO MFG Corp	Wilmington
Parcel 4	Wilmington Conservation Commission	Wilmington
Map 03 Block 05 Lot 02	Boston Edison Co	Woburn
Map 04 Block 01 Lot 02	Donald Robbins	Woburn
Map 04 Block 01 Lot 05	Peter Spinazola Trustee Anchor Realty Trust	Woburn
Map 04 Block 05 Lot 01	New Boston 324 Limited PTNR	Woburn

Prepared by/Date: BJR 9/12/2008
Checked by/Date: PHT 10/2/2008

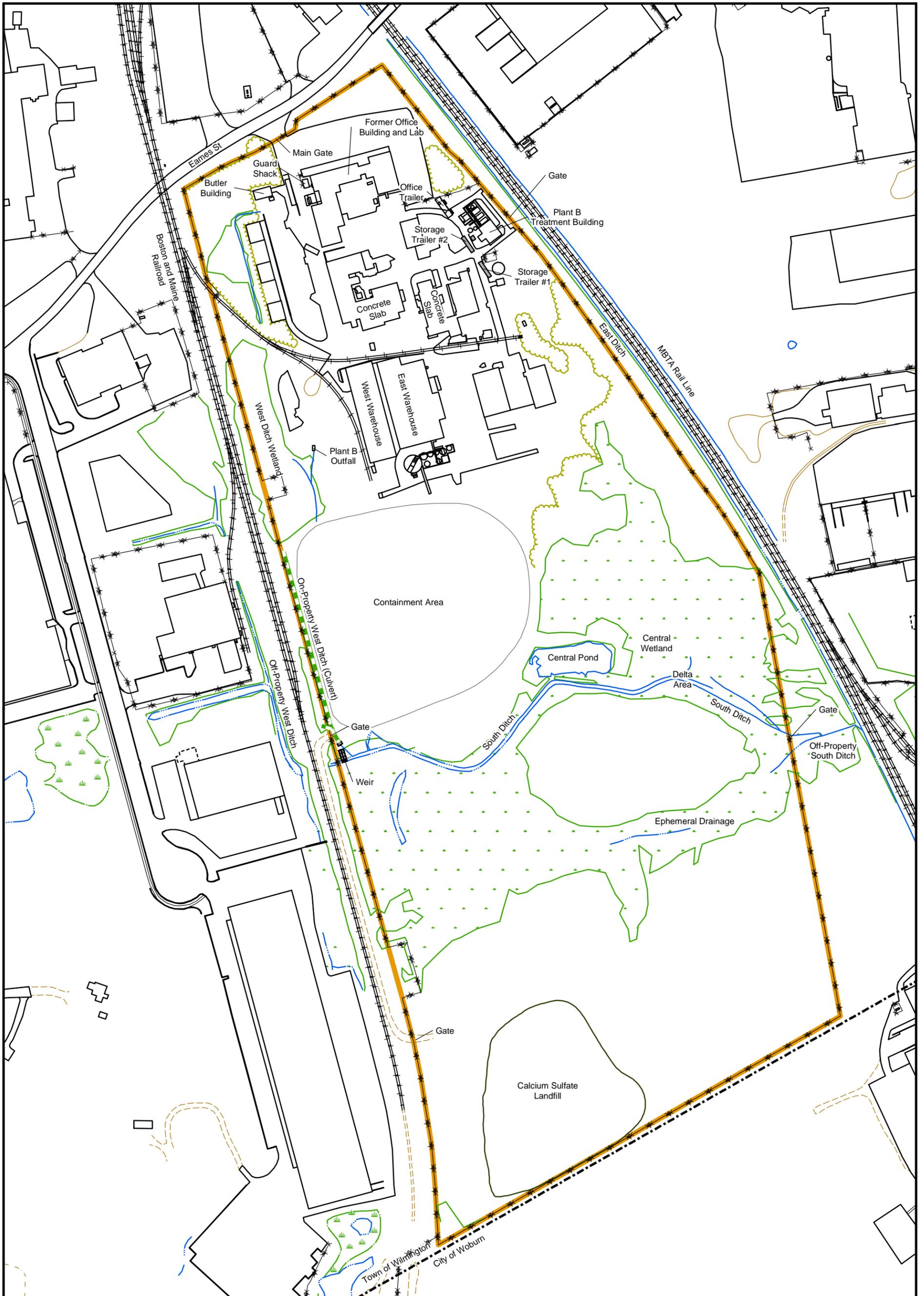
FIGURES



Olin Chemical Superfund Site
Wilmington, Massachusetts



Figure 1.0-1
Site Location
Site Management Plan



Legend		
51 Eames St. Property Boundary	Paved Road	Surface Water
Fences	Unpaved Road	Trails
Railroad	Sidewalks	Wetland Boundary
	Structures	Wooded Areas
		Town Line

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 Wakefield, MA 01880

N
 0 100 200 400 Feet

Figure 1.0-2
Current Site Features
on the Former Facility

Site Management Plan
Olin Chemical Superfund Site
Wilmington, Massachusetts

Prepared/Date: BJR 08/21/08 Checked/Date: PHT 08/21/08

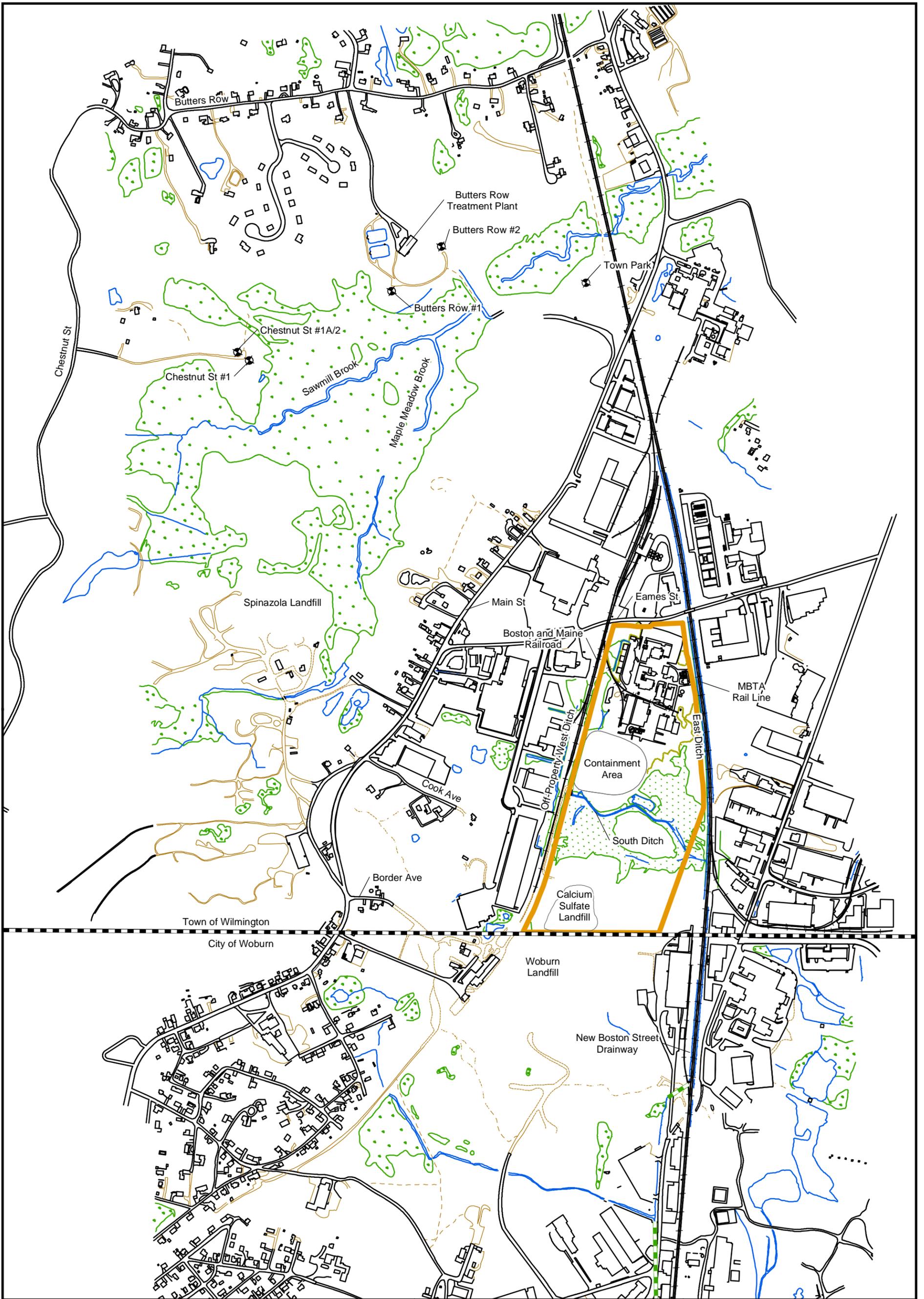


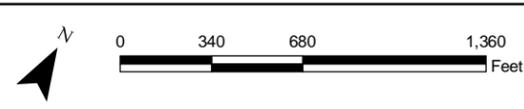
Figure 1.0-3
Current Site Features Off-Property Areas

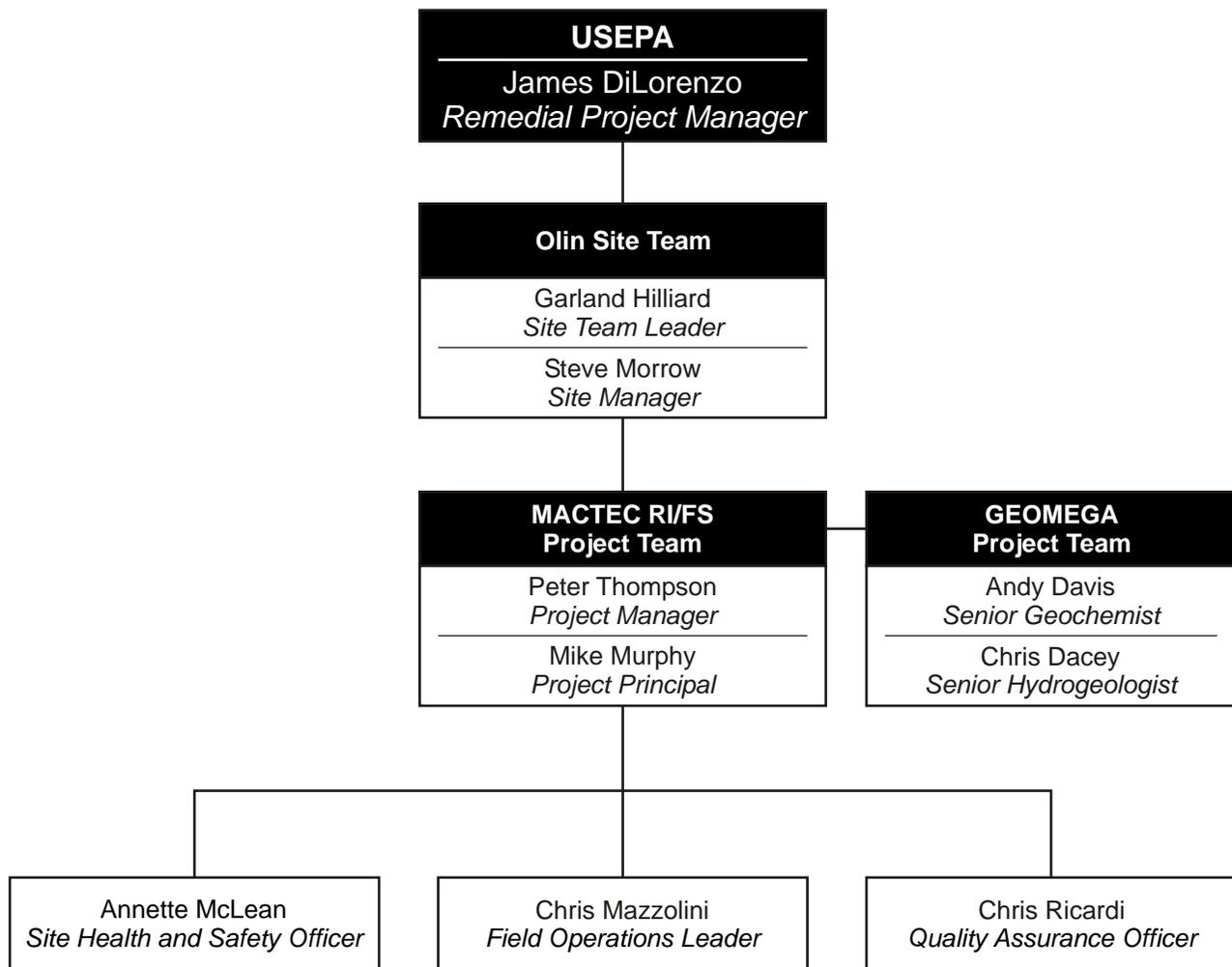
Site Management Plan
Olin Chemical Superfund Site
Wilmington, Massachusetts

Prepared/Date: BJR 04/20/09 Checked/Date: PHT 04/20/09

- Legend**
- Town Wells
 - ▭ Town Line
 - Paved Road
 - Unpaved Road
 - Sidewalks
 - Structures
 - 51 Eames St. Property Boundary
 - Surface Water
 - Trails
 - Wooded Areas
 - Wetland Boundary
 - Culvert

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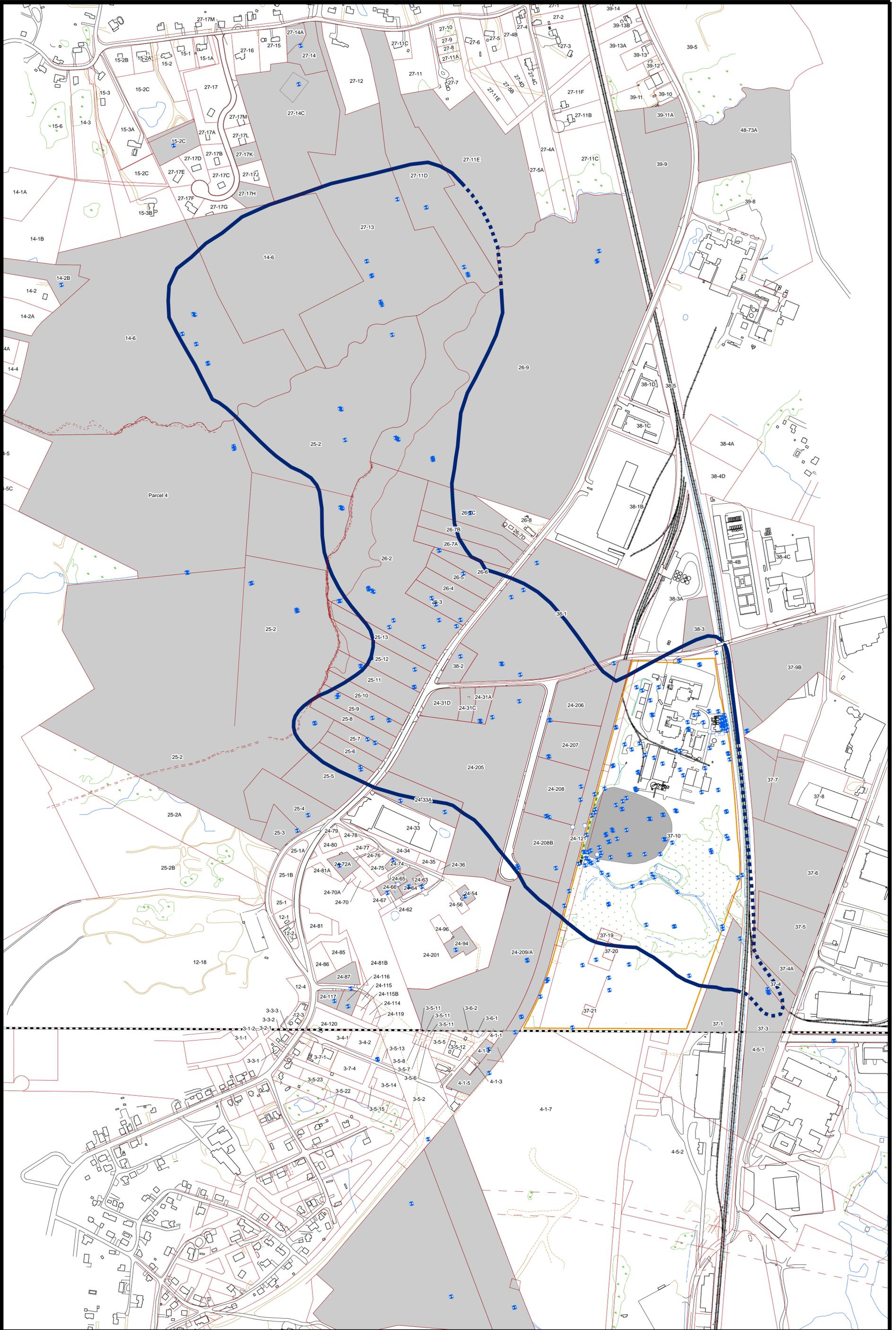


Prepared/Date: JPH 8/15/08
 Checked/Date: PHT 8/15/08

August 2008
 6100080016 Task 03



Figure 2.0-1
 Project Organization and Communication
 Site Management Plan
 Olin Chemical Superfund Site
 Wilmington, Massachusetts



- Legend**
- Parcel Boundary
 - Extent of Groundwater Impact
 - Inferred Extent of Groundwater Impact
 - Groundwater Sample Location
 - Wilmington/Woburn Town Line
 - 51 Eames St. Property Boundary
 - Property where access may be required
 - Water
 - Railroad
 - Paved Road
 - Unpaved Road
 - Wetland Boundary

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0 275 550 Feet

Figure 3.1-1
Properties Where Access May Be Required

Site Management Plan
Olin Chemical Superfund Site
Wilmington, Massachusetts

Prepared/Date: BJR 04/24/09 | Checked/Date: MH 04/24/09