

Stewardship Permit

Pursuant to Chapters 439 and 446k of the Connecticut General Statutes, a permit is issued to:

Permittees:

LANXESS Corporation
and
Borough of Naugatuck
280 Elm Street, Naugatuck, CT

Facility Identification:

Former Uniroyal Chemical Facility
EPA ID No. TBD
Permit Number: DEEP/REM/SP/2022-5030

To perform site-wide environmental investigation and cleanup (corrective action measures) and long-term stewardship at the hazardous and solid waste disposal facility in accordance with Connecticut General Statutes (CGS) Sections 22a-6, 22a-449(c), and Section 22a-449(c)-110 of the Regulations of Connecticut State Agencies (RCSA) as specified in the conditions set forth in this permit.

This permit regulates and authorizes the Permittees to perform corrective action measures and long-term stewardship at the facility. The permit does not authorize operation of a hazardous and solid waste management facility in the sense of treating, storing, or disposing of hazardous and solid wastes generated off-site.

All terms in this permit are defined in the permit or if not defined in the permit are as defined in Section 22a-449(c)-100 of the RCSA or in Title 40 of the Code of Federal Regulations (CFR) Parts 260, 261, 262, 264, 268, 270, 273 or 279.

This permit is based on the information described in the Stewardship Permit application (Application No. 202006880) filed on June 1, 2020. The Permittees must keep records of all data used to complete the permit application and any supplemental information submitted for the effective term of this permit. The permit application is incorporated by reference as part of the permit. Any false statements or inaccuracies contained in the information submitted by the Permittees may result in the suspension, revocation or modification of this permit and civil or criminal enforcement action.

The Permittees shall comply with all terms and conditions contained in the Permit. Any violation of any provision of this permit may subject the Permittees to enforcement action pursuant to the CGS including but not limited to Sections 22a-6a and 22a-131.

This permit is transferrable upon the Commissioner's written authorization, provided the Permittees and potential transferee have complied with the requirements set forth in CGS Section 22a-6o.

This permit may be revoked, suspended, modified, transferred, or reissued, in order to comply with applicable law. The Commissioner may also modify this permit when it is deemed necessary to do so.

The Permittees shall submit a revised permit application to the Commissioner at least one hundred and eighty (180) calendar days before making any changes to any of the permitted areas or activities. Any application shall be approved in writing by the Commissioner prior to the Permittees implementing such

change. The Permittees shall submit an application for a renewal of this permit to the Commissioner at least one hundred eighty (180) calendar days prior to its expiration date.

The terms and conditions of Consent Order No. SRD-178 issued on December 7, 2006 (the "Consent Order") are hereby superseded with the terms and conditions of this permit, and the Consent Order is hereby revoked for administrative purposes.

In the event of a conflict between any previously issued solid waste permit and the terms and conditions of this permit, the terms and conditions of this permit shall supersede.

This permit is hereby in effect and shall expire ten (10) years from this date.

August 18, 2022

Date

Katherine S. Dykes

Katherine S. Dykes
Commissioner

STEWARDSHIP PERMIT
LANXESS CORPORATION
and
BOROUGH OF NAUGATUCK

FORMER UNIROYAL CHEMICAL FACILITY
280 ELM STREET
NAUGATUCK, CT

EPA ID No. TBD
Permit No. DEEP/REM/SP/2022-5030

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LANXESS Corporation and
Borough of Naugatuck
280 Elm Street, Naugatuck CT

EPA ID No. TBD
DEEP/REM/SP/2022-5030

SECTION I
STANDARD FACILITY CONDITIONS

LANXESS CORPORATION
and
BOROUGH OF NAUGATUCK

EPA ID No. TBD
Permit No. DEEP/REM/SP/2022-5030

SECTION I
STANDARD FACILITY CONDITIONS

A. EFFECT OF PERMIT

Except as is provided in the Regulations of Connecticut State Agencies (RCSA) Section 22a-449(c)-110(a)(2) and except for any federally enforceable requirement(s), compliance with this permit (Permit) during its term constitutes compliance, for purposes of enforcement, with Connecticut General Statutes (CGS) Section 22a-449(c). This Permit may be modified, revoked and reissued, or terminated during its term as set forth in RCSA Section 22a-449(c)-110(a)(1), which incorporates by reference, with changes, Title 40 of the Code of Federal Regulations (40 CFR) Parts 270.41, 270.42 and 270.43.

The Permittees shall perform the activities required in Section II of this Permit in accordance with the application (Application No. 202006880) received by the Department of Energy and Environmental Protection (Department) on June 1, 2020 and the requirements of this Permit. In the event of a conflict between the Permittees' application and the requirements of this Permit, the requirements of this Permit shall take precedence and apply.

The issuance of this Permit does not authorize any injury to persons or property or invasion of other private rights, or any infringement of state or local law or regulations.

Term (Duration) - The effective date of this Permit is the date on which the Permit is signed by the Commissioner. This Permit is in effect for a term of ten (10) years and may be renewed at the end of the term, in accordance with the requirements described in the "Duty to Reapply" Section of this Permit.

In accordance with 40 CFR 270.73(a), upon issuance of this Permit the Permittees' Interim Status granted under the Resource Conservation and Recovery Act (RCRA) is hereby terminated. In addition, upon the Commissioner's determination that the Permittees have satisfied the requirements of this Permit, a Certificate of Completion shall be issued to the Permittees.

B. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

C. CONFIDENTIAL INFORMATION

The Permittees may claim that any information required to be submitted by this Permit contains or constitutes confidential information in accordance with CGS Section 1-210(b).

D. IMMINENT HAZARD ACTIONS

Notwithstanding any provision of this Permit, enforcement actions may be brought pursuant to Section 7003 of the RCRA, CGS Section 22a-6, or any other applicable law.

E. DUTIES AND REQUIREMENTS

1. Duty to Comply

The Permittees shall comply with all conditions of this Permit except that the Permittees need not comply with the conditions of this Permit to the extent and for the duration such

noncompliance is authorized in an Emergency Permit that explicitly authorizes any such noncompliance. Noncompliance by the Permittees with the terms of this Permit, except under the terms of an Emergency Permit, shall constitute a violation of this Permit and any applicable laws or regulations and is grounds for enforcement action, for Permit termination, revocation and reissuance or for denial of a Permit renewal. Emergency Permit as used herein shall mean Emergency Permit as identified in RCSA Section 22a-449(c)-110(a)(1) incorporating 40 CFR 270.61.

Unless superseded by a more stringent provision in this Permit, the Permittees shall comply with all of the applicable requirements of RCSA Sections 22a-133k-1 et. seq. (Remediation Standard Regulations or RSRs), as amended, and 22a-449(c)-100 et. seq., including any portion of 40 CFR 260 through 279 incorporated by reference therein.

A violation of this Permit for purposes of state and federal law constitutes a violation of a RCRA Permit.

2. Duty to Reapply

This Permit shall expire ten (10) years after the effective date of this Permit. The Permittees shall renew this Permit if any activity required under this Permit is not completed prior to the expiration date of this Permit. The Permittees need not reapply if all remedial activities required by state and federal regulations have been completed and no engineering or applicable institutional controls are needed to ensure the remediation's effectiveness. The Permittees shall apply for renewal of this Permit one hundred and eighty (180) calendar days prior to the date of expiration of this Permit, in accordance with RCSA Sections 22a-449(c)-104(a) and 22a-449(c)-110 incorporating 40 CFR 264.101 and 270.10(h) and any other applicable law.

3. Obligation for Continuing Corrective Action and Long-Term Stewardship Controls

The Permittees are required to renew and continue this Permit for any period necessary to comply with the requirements of this Permit.

4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce any activity authorized by this Permit in order to maintain compliance with the conditions of this Permit, unless otherwise required to do so by another state or federal authority.

5. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittees shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent its noncompliance from having significant adverse impacts on human health or the environment. No action taken by the Permittees pursuant to this section of this Permit shall affect or limit the Commissioner's authority under any other statute or regulation.

6. Permit Actions

This Permit may be modified, revoked and reissued, or terminated as provided for in 40 CFR 270.41, 270.42 or 270.43, and in accordance with all applicable law, including but

not limited to, CGS Sections 22a-6g and 6h and RCSA Sections 22a-3a-5 and 22a-449(c)-110. The filing of a request by the Permittees for a Permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition of this Permit.

7. Property Rights

This Permit does not convey any property rights of any sort, or any exclusive privilege to the Permittees.

8. Duty to Provide Information

The Permittees shall furnish to the Commissioner, within a reasonable time, any information which the Commissioner may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit or to determine compliance with this Permit. The Permittees shall also furnish to the Commissioner, upon request, copies of records required to be kept by this Permit.

9. Operation and Maintenance of Remedial Systems

The Permittees shall at all times properly operate and maintain all facilities and remedial systems of treatment and control (and related appurtenances) which are installed or used by the Permittees to achieve compliance with the conditions of this Permit and any Long-Term Stewardship Plans applicable to this Facility. Proper operation and maintenance, at a minimum, includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate laboratory quality assurance procedures. This provision requires the operation of backup, auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit.

10. Inspection and Entry

The Permittees shall allow the Commissioner, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- (a) Enter at reasonable times upon the Site where a regulated activity is located or conducted, or where records must be kept under the conditions of this Permit;
- (b) Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, operations regulated or required under this Permit; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by RCRA, any substance or parameters at any location.

11. Security

Pursuant to RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.14, the Permittees shall prevent the unknowing entry, and minimize the possibility for unauthorized entry,

of persons or livestock onto the active portion of the Facility. The Permittees shall secure the Facility to the extent necessary to protect human health.

12. Preparedness, Prevention, Contingency Plan and Emergency Procedures

- (a) The Permittees shall comply with the requirements of RCSA Section 22a-449(c)-104(a)(1) incorporating 40 CFR 264 Subpart C “Preparedness and Prevention” and 40 CFR 264 Subpart D “Contingency Plan and Emergency Procedures” until active remediation is complete.
- (b) The Permittees shall ensure that each entity under contract to provide emergency response services at the Facility has a Permit, issued by the Commissioner pursuant to CGS Section 22a-454, authorizing such entity to provide emergency response services. The Permittees shall maintain a copy of such Permit in the operating record for its Facility. The Permittees shall ensure that any action(s) taken by an entity (including such entity’s officers, employees, agents and subcontractors) providing emergency response services at its Facility conforms to the requirements of this Permit.
- (c) The Permittees shall ensure that each entity under contract with the Permittees to provide emergency response services visits the Site annually so that such entity is familiar with the Permittees’ Site and can respond to an emergency. The Permittees shall maintain in the operating record for its Facility a certification, in accordance with the requirements of RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11, attested to by each emergency response entity under contract with the Permittees to provide emergency response services, stating that such entity has complied with the requirements specified in this paragraph.

13. Monitoring and Records

The Permittees shall ensure that samples and measurements taken for the purpose of monitoring are representative of the monitored activity.

The Permittees shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Permit (e.g. records from groundwater monitoring including wells and surface elevations), the certification required by RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit, for a period of at least three (3) years from the date of the sample, measurement, certification, report or application. This period may be extended by request of the Commissioner at any time.

Records for monitoring information shall include:

- (i) The date, exact place and time of sampling or measurements;
- (ii) The individual(s) or company who performed the sampling or measurements;
- (iii) The date(s) analyses were performed;
- (iv) The individual(s) or company who performed the analyses;

- (v) The analytical techniques or methods used; and
- (vi) The results of such analyses.

14. Operating Record

The Permittees shall maintain, in writing, the following information in the Facility's operating record until termination of this Permit:

- (a) Summary reports and details of all incidents that require implementing the Contingency Plan pursuant to 40 CFR 264 Subpart D;
- (b) Records and results of inspections as required by this Permit, except this data need only be kept for three (3) years from the date of any such inspection;
- (c) Monitoring, testing or analytical data, and corrective action where required by 40 CFR 264 Subpart F or any regulatory section noted in 40 CFR 264.73(b)(6);
- (d) All corrective action cost estimates under RCSA Section 22a 449(c) 104 and 40 CFR 264.142 and 40 CFR 264 Subpart H; and
- (e) Any other information required by this Permit or by any applicable law to be maintained in the Facility Operating Record.

15. Signatory Requirements

The Permittees' application and all reports or information submitted to the Commissioner by the Permittees pursuant to this Permit shall be signed by the Permittees or the delegated licensed environmental professional for the Site and contain the certification prescribed in RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11.

16. Transfers

This Permit is not transferable to any person without the advanced written authorization of the Commissioner, who may request whatever information the Commissioner deems necessary regarding the potential transferee. Before any such transfer, the Permittees and any proposed transferee shall fully comply with the requirements of CGS Section 22a-60. The Commissioner may require modification or revocation and reissuance of this Permit to change the name of the Permittees and as an incident to any such transfer, incorporate such other requirements, as the Commissioner deems necessary.

In advance of transferring ownership or operation of its Facility prior to the termination of this Permit, the Permittees shall notify the prospective new owner or operator in writing of the requirements of this Permit, 40 CFR 264 through 270, and of the RCSA Section 22a-449(c)100 et al. The Permittees shall provide such prospective new owner or operator with a copy of this Permit.

The Permittees' failure to notify the new Permittee of the requirements of this Permit in no way relieves the new Permittee of his obligations to comply with all applicable requirements.

If the transfer of the property takes place and the Permittees retain this Permit, an access agreement between the Permittees and the prospective new owners of the Facility shall be approved by the Commissioner prior to the sale of the Facility/Site. The agreement shall include the anticipated times, locations and frequency of access needed in order for the Permittees to complete corrective action activities and conduct inspection, operation and management activities for all remedial systems. A copy of any Operations and Management Plan, referenced in the "Operation and Maintenance of Remedial Systems" Section of this Permit, and any Long-Term Stewardship Plans applicable to this Facility shall be provided to the prospective new owner prior to transfer of the property.

17. Reporting Requirements

- (a) Anticipated Non-Compliance. The Permittees shall give as much advance written notice as possible to the Commissioner of any planned changes in the Facility or activity, which may result in non-compliance with any requirement of this Permit.
- (b) Compliance Schedules. Except where otherwise provided for in this Permit, reports of compliance and non-compliance with, or any progress reports on, interim and final requirements contained in any Compliance Schedule (Section III) of this Permit, shall be submitted no later than fourteen (14) calendar days following each schedule date, to the extent such reports are required herein.
- (c) 24-Hour Reporting.
 - (i) The Permittees or designee shall verbally report to the Commissioner any remediation or waste related activity at its Facility, irrespective of whether such activity is in compliance with the requirements of this Permit, which does or may pose an imminent and substantial endangerment to human health or the environment, immediately but not later than twenty-four (24) hours from the time the Permittees become aware or should be aware of the circumstances causing such endangerment.

The report to the Commissioner shall include:

- (A) Name, address, and telephone number of the Permittees;
- (B) Name, address, and telephone number of the Facility;
- (C) Date, time and type of incident;
- (D) Description of the occurrence and its cause;
- (E) Name and quantity of waste(s) or constituents thereof involved;
- (F) The extent of injuries, if any;
- (G) An assessment of actual or potential hazards to human health and the environment;
- (H) Estimated quantity and disposition of recovered waste that resulted from the incident;

- (I) All information concerning the release of any waste or constituents thereof that may cause an endangerment to public drinking water supplies; and
 - (J) All information concerning a release or discharge of waste or constituents thereof or of a fire or explosion from the Facility, which could threaten human health or the environment
- (ii) A written submission shall also be provided within five (5) calendar days of the time the Permittees become aware of the circumstances described in subdivision (i) above. The written submission shall contain a description of the endangerment and its cause; the period of endangerment including exact dates and times, if the endangerment has been abated, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the endangerment. The Permittees shall maintain in the operating record of its Facility a copy of all such written reports. The Commissioner may waive the five (5) day written notice requirement in favor of a written report within fifteen (15) days of the incident requiring reporting.
- (iii) Nothing in this section shall affect or relieve the Permittees of their obligations under CGS Sections 22a-6u or 22a-450.
- (d) Other Noncompliance. The Permittees shall report all instances of noncompliance with this Permit not otherwise required to be reported by this Permit to the Commissioner as part of any other required monitoring report, no later than thirty (30) days of the date the Permittees are aware, or reasonably should have been aware of any such noncompliance. Any such report shall contain, at a minimum, the information listed in this Permit.
- (e) Other Information. When the Permittees become aware that they failed to submit any relevant facts or information in a Permit application, or submitted incorrect information in a Permit application, report or other document provided to the Commissioner regarding this Permit, they shall submit such relevant facts or correct information to the Commissioner within thirty (30) calendar days of becoming aware of such facts or information.

18. Computation of Time

- (a) Except as is expressly provided for in this Permit, the computation of time periods set forth in this Permit shall be as follows:
- (i) Any time period scheduled to begin on the occurrence of an act or event shall begin on the day after the act or event.
 - (ii) Any time period scheduled to begin before the occurrence of an act or event shall be computed so that the period ends on the day before the act or event.

(iii) If the final day of any time period falls on a Saturday, Sunday or a federally or state recognized legal holiday, the time period shall be extended to the next working day.

(b) Submission of Reports. Where this Permit requires the submission of a written report, a notification or other information or documentation to the Commissioner, the report or notification shall be deemed submitted on the date such report, notification or other information is received by the Department.

19. Availability, Retention and Disposition of Records

The Permittees shall ensure that all records required under RCSA Sections 22a 449(c) 100 to 119, the Remediation Standard Regulations or this Permit, including all plans, are furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the Department or the United States Environmental Protection Agency (EPA).

The retention period for all records required under RCSA Sections 22a-449(c)-100 to 119 and this Permit is extended automatically during the course of any unresolved enforcement action regarding the Facility or as requested by the Commissioner or the Regional Administrator of EPA.

20. Additional Requirements

Requirements not included in this Permit, which become effective by statute or regulation, and not made specifically inapplicable to facilities with a Permit, shall apply to the Facility. In the event of any conflict between this Permit and any such requirement, the Permittee shall comply with the more stringent requirement. If the Permittee does not fully comply with the more stringent requirement, the Department may enforce either requirement.

21. Federal, State and Local Laws

Nothing in this Permit shall be construed to prohibit any federal, state or political subdivision thereof from imposing any requirements to the extent authorized by law which are more stringent than those imposed by this Permit.

In addition, nothing in the Permit shall relieve the Permittees of their obligation to comply with any other applicable federal, state, or local statute, regulation or ordinance.

22. Modification of the Compliance Schedule

The Permittees may request to modify the submittal due dates of the Compliance Schedule (Section III) of this Permit at any time. Such requests shall be submitted for the Commissioner's review and written approval and shall include sufficient justification for such request(s).

The Commissioner may grant extensions of submittal due dates based on the Permittees' demonstration that sufficient justification for the extension exists. Extensions to due dates, which this Permit explicitly defines as being due by a certain time or during a certain time interval, may be granted by the Commissioner if sufficient justification for the extension is demonstrated by the Permittees.

23. Retention of a Licensed Environmental Professional

- a. The Permittees shall designate and/or retain one or more qualified Licensed Environmental Professionals (LEPs) acceptable to the Commissioner to prepare the documents required in Section II of this permit and shall notify the Commissioner in writing of the identity of such LEP(s). The Permittees shall assign such LEP(s), acceptable to the Commissioner, until the requirements of Section II of the Permit are fully complied with. For the purposes of this Permit, the Commissioner finds Nicholas Hastings to be an acceptable LEP.
- b. The Permittees shall notify the Commissioner in writing of the identity of any LEP other than the one(s) approved by the Commissioner, within ten (10) days after assigning or retaining any LEP for the purpose of addressing the actions required by this permit. The Permittees shall submit to the Commissioner a description of the assigned LEP's education, experience and training which is relevant to the work required by this Permit within ten (10) days after a request for such a description has been made. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable LEP unacceptable.

F. DEFINITIONS

Any term not otherwise defined herein shall be defined as that term is defined in RCSA 22a-449(c)-100 through 119 incorporating 40 CFR 264 through 279. Notwithstanding Sections I.E.20 and I.E.21 of this Permit, in the event of any conflict between any of the following definitions and any definition provided in any other applicable legal requirement, the following definitions shall control

1. “Active Remediation” or “Active Remedial Activities” shall mean the period prior to completion of activity conducted pursuant to Section II of this Permit, with the exception of that period when the only remaining activity are activities such as post-remedial monitoring or monitored natural attenuation.
2. “Annual” with respect to monitoring shall mean that any associated required inspections, sampling, and analysis shall occur no later than December 31st of the calendar year. The results of such sampling and analysis shall be submitted to the Commissioner no later than March 1st of the subsequent year.
3. “Area of Concern” or “AOC” shall mean any area that has had a probable release of a hazardous waste or hazardous constituents and that is determined by the Department to pose a current or potential threat to human health or the environment.
4. “Certificate of Completion” shall mean a document recognizing the Commissioner’s determination that all environmental investigation and remediation has been completed and no long-term stewardship obligations remain. This non-regulatory certificate is issued based on the Commissioner’s regulatory determination that a Permit is not needed for the Facility or portion of Facility.
5. “Certificate of Stewardship” shall mean a document recognizing the Commissioner’s issuance of a Long-Term Stewardship Permit for the Facility. This non-regulatory certificate is issued to communicate that the Permit’s purpose is not to authorize commercial waste management operations, and is limited to environmental investigations, remediation, and long-term stewardship obligations.
6. “Constituent of Concern” shall mean a component, breakdown product, or derivative of a substance that may be found in the environment as a result of a release at or from the Facility, or a reaction caused by such a release, and that is determined by the Department to pose a current or potential threat to human health or the environment.
7. “CFR” shall mean the Code of Federal Regulations.
8. “Commissioner” shall mean the Commissioner of Energy and Environmental Protection as defined in the CGS Section 22a-2 or the Commissioner’s duly authorized designee.
9. “Corrective Action” shall mean the process of identifying, investigating, and remediating releases of hazardous constituents to the environment. “Corrective action” and “remediation” may be used interchangeably in this Permit.
10. “Department” or “DEEP” shall mean the Connecticut Department of Energy and Environmental Protection.

11. “Discover,” “Discovery,” or “Discovered” refer to the date on which the Permittees either:
(i) visually observe evidence of a new Solid Waste Management Unit (SWMU) or Area of Concern (AOC), (ii) visually observe evidence of a previously unidentified release of hazardous constituents to the environment, (iii) receive information which suggests the presence of a new release of hazardous waste or hazardous constituents to the environment, or (iv) receive information which indicates the presence of a previously undocumented release of hazardous waste or hazardous waste constituents to the environment.)
12. “Environmental Land Use Restriction” (ELUR) shall mean the easement granted to the Commissioner by the property owner that is recorded on the municipal land records in order to reduce the risk of human exposure to pollutants and hazards to the environment by preventing specific uses or activities at a property or a portion of a property, pursuant to Section 22a-133q-1 of the Regulations of Connecticut State Agencies, as revised on February 16, 2021, and as may be amended from time to time.
13. “Facility” shall mean, pursuant to 40 CFR 260.10 all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing or disposing of hazardous waste and all contiguous property under control of the owner or operator.

A specific, legally definable land parcel that is one of multiple parcels comprising the Facility may separately receive a Certificate of Completion from the Commissioner for only that parcel and portion of the facility. This Certificate of Completion indicates the Commissioner’s approval that all remediation is complete and no long-term stewardship obligations remain for that parcel (as indicated by the issuance of a letter determining that “remediation is complete without controls” and a “certificate of completion”). If such a finding is made, then the terms “Site” and “Facility” shall subsequently refer only to the land that no longer includes such parcel.

For the purposes of the Permit, Facility shall mean the 86.65-acre parcel of land located at 280 Elm Street in Naugatuck, CT, as delineated on Figure 1 and subject to the requirements of this Permit.
14. “Final Closure” shall mean the completion of the closure of all Hazardous Waste Management Units at the Permittee’s Facility in accordance with the requirements of this Permit.
15. “Hazardous Waste” or “Hazardous Wastes” shall mean hazardous waste as identified or listed as hazardous waste pursuant to 42 U.S.C. Section 6901 et. seq. and RSCA Section 22a-449(c)-101.
16. “Hazardous Waste Management Unit” or “HWMU” shall mean a contiguous area of land on or in which hazardous waste is placed, or the largest area in which there is a significant likelihood of mixing hazardous waste constituents in the same area and are subject to the closure and post-closure requirements of 40 CFR 264 Subpart G. Examples include: surface impoundment, waste pile, land treatment area, landfill cell, incinerator, a tank, and a greater than 90-day storage area.
17. “Land Disposal Unit” shall mean a Hazardous Waste Management Unit where Hazardous Waste or contamination remains in the Regulated Unit.
18. “Permittees” shall mean the persons responsible for the overall operation of the facility who have been issued a license by the Commissioner. As used herein “person” is defined in Section 22a-423, Chapter 446k, of the CGS and “license” is defined in Section 4-166, Chapter 54 of the CGS.

19. “Post-Closure Period” shall mean a minimum of thirty (30) years from the date of certification of closure of Land Disposal Units. This period shall be extended or shortened by the Commissioner in accordance with 40 CFR 264.117(a)(2). The Commissioner is extending the Post-Closure Period for a minimum of an additional ten (10) years from the date of this Permit’s issuance, and for as long as this Permit continues in effect, because waste or contamination remains in place. In the event all wastes and contaminated environmental media are removed, an alternate Post-Closure Period may be approved by the Commissioner.
20. “Quarterly” with respect to inspections, sampling and analysis shall mean that the inspections, sampling and analysis shall occur approximately once every three (3) consecutive months in a calendar year (e.g. January, April, July and October). The results of such inspections, sampling and analysis shall be submitted to the Commissioner according to the schedules established in the Long-Term Stewardship Plan(s).
21. “Regulated Unit” shall mean a surface impoundment, waste pile and land treatment unit or landfill that received hazardous waste after July 26, 1982 and is subject to the requirements of 40 CFR 264.91 through 264.100 for detecting, characterizing and responding to releases in the uppermost aquifer.
22. “Remediation” shall mean the process of identifying, investigating, and remediating releases of hazardous constituents to the environment. “Corrective action” and “remediation” may be used interchangeably in this Permit.
23. “Remediation Standard Regulations” (RSRs) means the Connecticut Remediation Standard Regulations as defined in the Regulations of Connecticut State Agencies (RCSA), Sections 22a-133k-1 through 22a-133k-3, adopted January 1, 1996 and amended February 16, 2021 and as otherwise amended.
24. “Semi-annual” with respect to inspections, sampling and analysis shall mean that sampling and analysis shall occur approximately once every six (6) consecutive months in a calendar year (e.g. during January and July, or April and October). The results of such inspections, sampling and analysis shall be submitted to the Commissioner according to the schedules established in the Long-Term Stewardship Plan(s).
25. “Solid Waste Management Area” or “SWMU” shall mean any unit which has been used for the treatment, storage or disposal of solid or hazardous wastes at any time, or any area that has been contaminated by routine or systematic releases of hazardous waste or hazardous constituents and are subject to the corrective action requirements of 40 CFR 264 Subpart F.
26. “Site” shall mean the same or geographically contiguous property which may be divided by public and private right-of-way, provided the entrance and exit between the properties is at a cross-road intersection, and access is by crossing opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way that such person controls and to which the public does not have access, is also considered part of the site property. The terms “Facility” and “Site” may be used interchangeably in this Permit.
27. “Verification” shall mean the rendering of a written opinion by a licensed environmental professional on a form prescribed by the commissioner that an investigation of the parcel has been

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performed in accordance with prevailing standards and guidelines and that the Facility has been remediated in accordance with the remediation standards.

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SECTION II
AUTHORIZED ACTIVITIES

LANXESS CORPORATION
and
BOROUGH OF NAUGATUCK

EPA ID No. TBD
Permit No. DEEP/REM/SP/2022-5030

SECTION II
AUTHORIZED ACTIVITIES

A. RCRA CORRECTIVE ACTION REQUIREMENTS

1. Performance of Corrective Action

The Permittees shall perform corrective action in accordance with the requirements of this Permit, the Remedial Action Plan(s) submitted and approved pursuant to this Permit, and any other plan(s) submitted and approved pursuant to this Permit.

The Permittees shall ensure that any investigations for each Solid Waste Management Unit (SWMU) and Area of Concern (AOC) are completed within two (2) years from the date of issuance of this Permit; and that remediation is initiated within three (3) years from the date of issuance of this Permit of any SWMU or AOC and completed within ten (10) years of issuance of this Permit or in accordance with an alternative schedule approved in writing by the Commissioner.

The conditions of this section apply to:

- (a) The SWMUs and AOCs as identified in Table 1
- (b) Any additional SWMUs and AOCs discovered during the course of corrective action, characterization, groundwater monitoring, field investigations, environmental audits, or other means; and
- (c) Contamination that has migrated or may migrate beyond the Facility boundary, whereas necessary to protect human health and the environment.

The Permittees shall implement corrective actions beyond the Facility boundary where necessary to protect human health and the environment consistent with RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.101(c), unless the Permittees demonstrate, to the satisfaction of the Commissioner, that despite the Permittees' best efforts, as determined by the Commissioner, the Permittees were unable to obtain the necessary permission to undertake such actions. The Permittees are not relieved of all responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for completion of such off-site corrective action will be required.

2. Schedule/Scope of Work

The Permittees shall submit schedule(s)/scope(s) of work as necessary for further investigation and remediation of releases of hazardous waste and hazardous substances at or from the Facility such that the remediation will achieve compliance with the Remediation Standard Regulations. Such schedule(s) and scope(s) of work shall include, at a minimum, a schedule for development and implementation of all outstanding investigation and remediation activities, and any specific activities identified by the Commissioner. Including at least the following plans and/or reports and activities:

- (a) Site Characterization and Investigation Work Plan. The Permittees shall submit for the Commissioner's review and written approval a work plan for additional site characterization and investigation activities as necessary.
- (b) Remedial Action Plan (RAP)
The Permittees shall submit for the Commissioner's review and written approval one or more RAP(s) and associated cost estimates, developed in accordance with Financial Assurance Responsibility Obligations of this Permit and RCSA Sections 22a-449(c)-104(a)(1), incorporating 40 CFR 264, and RCSA Sections 22a-133k-1 et. seq. which details the steps to be taken to perform corrective action. The RAP(s) shall address one or more environmental media at the entire Site or area affected by or any portion thereof and shall include:
- (i) Description of the areas at which the remediation will take place identifying the SWMUs and AOCs addressed and the environmental media being remediated;
 - (ii) Description of the remedial alternatives considered for performing the specified remediation and the most expeditious schedule for performing each alternative;
 - (iii) Proposed preferred alternative with supporting justification therefore;
 - (iv) Proposed detailed implementation plan and schedule to perform the preferred remedial actions, including the generation and collection of any supplemental site information needed to support completion of remedial design. Such schedule shall include a schedule for applying for and obtaining all Permits and approvals required for such remedial actions and describe the establishment of financial assurance for each proposed phase of remedial activity; and
 - (v) Identify the data gaps and describe the rationale used for determining whether (1) no further investigation is required, or (2) additional investigation is necessary to fill any significant data gaps. If additional investigation is needed, the Permittees shall include a plan for the implementation of such investigations and a report summarizing the findings;
 - (vi) Identify all areas exceeding any remedial criteria and a proposal for the additional characterization data needed to complete the remedial design in order to achieve compliance with RSRs for polluted soil, surface water and groundwater; and a proposed implementation plan and schedule addressing such areas of contamination.
 - (vii) Ecologically-based and human health-based criteria for sediment, an identification of all areas exceeding such criteria and a proposed implementation plan and schedule addressing such areas.

The RAP(s) and associated schedule(s) may propose activities be conducted in phases associated with a focus on a particular environmental medium, reasonably deferring filling the data gap to the remedial design stage where appropriate.

Any RAP containing monitored natural attenuation as the selected remedy for groundwater migrating off the Site shall include: 1) an evaluation of the need for source mitigation to achieve remedial criteria; 2) a monitoring and data evaluation plan designed to evaluate the remedy performance; and 3) a contingency remedy conceptual approach in the event that monitored natural attenuation does not perform as anticipated and a schedule for implementation

(b) Quality Assurance Project Plan

The Permittees shall prepare and submit for the Commissioner's review and written approval a Quality Assurance Project Plan (QAPP), prepared in accordance with the document titled: Quality Assurance Guidance for Conducting Brownfields Site Assessments, US Environmental Protection Agency OSWER Directive No. 9230.0-83P, and incorporating Connecticut's Reasonable Confidence Protocols, or subsequent federal or state guidance on QAPPs.

The Permittees shall ensure that the data is of sufficient quality to make decisions regarding investigation, potential remediation, and monitoring of the Site.

3. Ecological Risk Assessment

The Permittees have submitted to DEEP a Screening Level Ecological Risk Assessment in September 2003 and a Supplemental Naugatuck River Ecological Risk Assessment in August 2008. Species of concern were not identified at the site in a review of Natural Diversity Database areas at the time of the application. No further assessment is required at the time of the issuance of this Permit. The Permittees shall ensure that all ecological risks have been addressed appropriately including consideration of water bodies on the CT DEEP Impaired Waters List.

4. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs

The Permittees shall notify the Commissioner in writing, within fifteen (15) calendar days of discovery, of any new suspected or confirmed AOCs or SMWUs as discovered under this Permit. Such notification shall include, at a minimum, the following information:

- (a) Location of the unit(s) on a topographic map of appropriate scale (such as required under 40 CFR 270.14(b)(19));
- (b) Designation of the type and function of unit(s);
- (c) General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings);
- (d) The date that the unit(s) was operated;
- (e) Specifications of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes; and

- (f) All available information (groundwater data, soil, soil gas, sediment, air, and/or surface water data) pertaining to any release of hazardous waste or hazardous constituents from such unit(s).

5. Notification Requirements for Newly Discovered Releases From SWMUs and AOCs

- (a) The Permittees shall notify the Commissioner in writing of any newly discovered release(s) of hazardous waste or hazardous constituents discovered during the course of characterization, groundwater monitoring, field investigations, environmental audits, or other means, within fifteen (15) calendar days of discovery.

Such newly discovered release(s) may be from SWMUs or AOCs identified in this Permit or SWMUs or AOCs previously identified for which it had been determined that further investigation was not required.

- (b) If the Commissioner determines that further investigation of the SWMUs or AOCs is needed, the Permittee shall be required to prepare a plan for such investigations within sixty (60) calendar days of notification by the Commissioner.

6. Interim Measures (IM)

(a) Work Plan

- (i) Interim Measures Identified by Commissioner: Upon notification by the Commissioner, the Permittees shall prepare and submit an Interim Measures (IM) Work Plan for any SWMU or AOC that the Commissioner determines is necessary in order to minimize or prevent the further migration of contaminants, thereby limiting current and future potential for human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented to meet the requirements of the RSRs.

The IM Work Plan shall be submitted within sixty (60) calendar days of such notification and shall include the elements listed in this Permit. Such interim measures may be conducted concurrently with investigations required by this Permit.

- (ii) Interim Measures identified by Permittees: The Permittees may initiate IM at a SWMU or AOC by submitting the appropriate notification pursuant to this Permit. The Commissioner will process Permittee-initiated IM by either conditionally approving the IM or imposing an IM Work Plan per the conditions of this Permit. Permittee-initiated IM shall be considered conditionally approved unless the Commissioner specifically imposes an IM Work Plan within thirty (30) calendar days of receipt of notification of the Permittee-initiated IM. The scope and success of Permittee-initiated IM conditionally approved shall be subject to subsequent in-depth review; the Commissioner will either comment on or approve the Permittee-initiated IM. Permittee-initiated IM must follow the progress and final reporting requirements per the conditions of this Permit.

- (iii) The IM Work Plan shall ensure that the interim measures are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with and integrated into any long-term solution at the Facility. The IM Work Plan shall include: the interim measure's objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.

- (b) IM Implementation
 - (i) The Permittees shall implement the IM under in accordance with the approved IM Work Plan.

 - (ii) The Permittees shall give notice to the Commissioner within seven (7) calendar days of any planned changes, reductions or additions to the IM Work Plan

- (c) Interim Measures Reports
 - (i) Progress Reports: If the time required for completion of interim measures is greater than one year, the Permittees shall provide the Commissioner with progress reports at intervals specified in the approved Work Plan or annually for Permittee initiated interim measures. The Progress Reports shall contain the following information at a minimum:
 - (A) A description of the portion of the interim measures completed;

 - (B) Summaries of the findings;

 - (C) Summaries of any deviations from the IM Work Plan during the reporting period;

 - (D) Summaries of any problems or potential problems encountered during the reporting period; and

 - (E) Projected work for the next reporting period.

 - (ii) Completion Report: The Permittees shall prepare and submit to the Commissioner, within ninety (90) calendar days of completion of interim measures and receipt of validated analytical data. Such report shall contain, at a minimum, the following information:
 - (A) A description of the interim measures implemented;

 - (B) Summaries of results;

 - (C) Summaries of all problems encountered;

 - (D) Summaries of accomplishments and/or effectiveness of interim measures; and

- (E) Copies of all relevant laboratory/monitoring data etc. in accordance with this Permit.

7. Remedy Selection and Notification of Remedial Implementation

- (a) The Permittees shall propose a remedy or evaluate one or more remedial alternatives, if necessary, to meet the criteria in the Remediation Standard Regulations. The Commissioner may require that specific remedial alternatives be evaluated. All remedial alternatives must meet the threshold and balancing criteria specified below.

Threshold Criteria:

- (i) Protect human health and the environment;
- (ii) Achieve media cleanup objectives using criteria in the Remediation Standard Regulations; and
- (iii) Control sources of releases to reduce or eliminate further releases.

Balancing Criteria:

- (i) Long-term effectiveness;
- (ii) Toxicity, mobility and volume reduction;
- (iii) Short-term effectiveness;
- (iv) Implementability;
- (v) Cost;
- (vi) Community acceptance; and
- (vii) State acceptance.

The proposed remedy may include any IM implemented to date.

- (b) The Commissioner will select and approve the remedy to be implemented at the Facility. The Commissioner is not confined to these alternatives evaluated by the Permittees when selecting and approving a remedy for the Site or area affected by the Site or any portion thereof.

8. Public Notice Requirements

The Permittees shall provide public notice of any proposed remediation and the Commissioner's tentative determination that remediation and/or surface and groundwater monitoring is complete. Each public notice must provide a forty-five (45) calendar day comment period and a public information meeting or hearing no earlier than thirty (30) calendar days from the date of the public notice and no later than forty five (45) calendar days after the public notice.

- (a) Prior to the commencement of any proposed remedial action, the public notice shall summarize the investigations undertaken, the results of the investigations, clearly identify the proposed remedial activities, and include an address and telephone number for a contact person. The Permittees shall:
 - (i) Publish the notice in a newspaper having substantial circulation in the municipality in which the Site or the affected area is located;
 - (ii) Broadcast the notice on a radio station during the high volume listening times on the same day the notice is published;
 - (iii) Provide a copy of the notice to the Chief Elected Official and the Director of Health of the municipality where the Site or affected area is located;
 - (iv) Provide a copy of the notice to the owner or operator of the Site (if the Permittee is not the Site owner or operator) and to all persons on the Facility mailing list maintained pursuant to 40 CFR 124.10(c)(1)(ix); and
 - (v) Erect and maintain a sign at least six (6) feet by four (4) feet for at least thirty (30) calendar days in a legible condition at the Site, clearly visible from the public highway and including the words “ENVIRONMENTAL CLEAN-UP IN PROGRESS AT THIS SITE. FOR FURTHER INFORMATION CONTACT:”, and a telephone number at which any interested person may obtain additional information about the remediation.

- (b) Prior to the Commissioner’s final determination that remediation and/or or surface and groundwater monitoring is complete, the Permittees shall:
 - (i) Publish the notice in a newspaper having substantial circulation in the municipality in which the Site or the affected area is located;
 - (ii) Broadcast the notice on a radio station during the high volume listening times on the same day the notice is published;
 - (iii) Provide a copy of the notice to the owner or operator of the Site (if the Permittee is not the Site owner or operator) and to all persons on the Facility mailing list maintained pursuant to 40 CFR 124.10(c)(1)(ix); and
 - (iv) Include a summary of the basis for the Commissioner’s determination.

- (c) Upon the completion of the public comment period the Commissioner shall make a final determination. If the final determination is that remediation is complete then the Stewardship Permit will be terminated and a Certificate of Completion will be issued.

9. Implementation of Remedial Activities
The Permittees shall perform all remediation activities for soil, sediment, groundwater and surface water pollution in accordance with the approved RAP(s), any schedules contained therein, and in accordance with the Remediation Standard Regulations.

10. Completion of Active Remediation
 - (a) The Permittees shall notify the Commissioner in writing at least ninety (90) calendar days prior to the date it expects to complete the active remedial activity(ies) at the Site or area affected by the Site or any portion thereof.

 - (b) Within sixty (60) calendar days after the completion of the active remediation, the Permittees shall submit to the Commissioner via registered mail, a certification signed by the Permittees and by an independent, registered professional engineer stating that the active remediation phase(s) at the Site or areas affected by the Site or any portion thereof has been completed in accordance with the specifications of the approved RAP(s). Documentation supporting the certification shall be furnished upon the Commissioner's request.

B. LONG-TERM STEWARDSHIP RESPONSIBILITIES

1. Long-Term Stewardship Plans
Unless such plan has previously been approved by the Commissioner, the Permittees shall prepare and submit for the Commissioner's review and approval a Long-Term Stewardship Plan identifying how to maintain the effectiveness of the Facility's remediation into the future, including, but not limited to, engineered controls, institutional controls, air and water monitoring, ongoing active remediation, passive remediation, and monitored natural attenuation.

In the event that it is determined that the closure of any Hazardous Waste Management Unit requires the designation as a Land Disposal Unit, the Permittees shall incorporate the post-closure care for such units in the revised Plans. Such plans shall include:

- (a) A description and frequency of the planned maintenance and inspection activities that will be performed to ensure: (A) the integrity of the cap/final cover and/or other containment systems; and (B) the function of the monitoring equipment;

- (b) A compliance monitoring program developed in accordance with the requirements of RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.99, and an evaluation of the existing monitoring data to determine if compliance is achievable;

- (c) If it is determined that compliance cannot be achieved the Permittees shall include a description of how corrective action, required pursuant to 40 CFR 264.100, will be interrelated into site-wide corrective activities.

- (d) The name, address and phone number of the Facility contact person during the Post-Closure Care Period;

- (e) A schedule for the reporting requirements, including but not limited to, groundwater monitoring reports, scheduled and unscheduled inspection and

maintenance reports, and corrective action reports resulting from inspection and maintenance activities; and

- (f) A detailed estimate of the cost of performing post-closure care of the land disposal units developed in accordance with the 40 CFR 265 Subpart H.

2. Revisions to Approved Plans

If at any time the Commissioner or the Permittees determine that a revision to an approved Plan is needed or required, the Permittees shall prepare and submit for the Commissioner's review and written approval a revised Long-Term Stewardship Plan. If the Commissioner determines that a deviation from an approved Plan has occurred that requires a Class 2 or 3 modification of the Permit, or if the Commissioner has identified problems or issues related to implementation of an approved Plan, then the Commissioner may require the Permittees to prepare and submit for the Commissioner's review and written approval a revised Long-Term Stewardship Plan or a Corrective Action Plan to correct any such deviations or actions necessary to ensure the Facility conditions are maintained to protect human health and the environment.

The Permittees shall submit a written notification or request for a Permit modification to authorize a change in the approved Long-Term Stewardship Plan in accordance with the applicable requirements of 40 CFR 124 and 40 CFR 270. The written notification or request must include a copy of the amended Long-Term Stewardship Plan for the Commissioner's review and written approval.

3. Copy of Approved Plans

The Permittees shall ensure that a copy of any approved Long-Term Stewardship Plan is kept at the Facility or at an alternate location acceptable to the Commissioner, while Long-Term Stewardship is required to maintain the remediation.

4. Implementation of Long-Term Stewardship Plan, including:

Upon written approval of a Long-Term Stewardship Plan from the Commissioner, the Permittees shall perform long-term stewardship obligations for remediation systems, engineered controls, and applicable institutional controls, inclusive of surface and groundwater monitoring in accordance with previously approved plans.

- (a) Ensure Maintenance of Institutional Controls. Every five (5) years certify to the Commissioner on a form or in a format acceptable to the Commissioner that any applicable institutional control remains in place and no changes in land use or other use has occurred in violation of the institutional control approved by the Commissioner.
- (b) Operate and Maintain Remediation Systems, Monitoring Systems and Engineered Controls. The Permittees shall operate and maintain applicable remediation systems and engineered controls as warranted in accordance with any previously approved Operations and Maintenance Plan for any existing approved engineered control(s) in use at the Facility.

In the absence of an existing approved plan, the Permittees shall develop an Operations and Maintenance Plan for any remediation systems or Engineered

Controls used to implement the Remedial Action Plan or final remedy for this Facility, which includes, at a minimum, the following requirements.

- (c) Inspection Obligations. The Permittees shall inspect any remediation systems or engineered controls, such as vapor migration control systems, soil treatment systems, groundwater treatment and monitoring systems, landfill caps of waste in place and contaminated soil.

Inspections shall look for malfunctions, deterioration, and discharges, which may lead to any release of a substance.

For caps, such inspections shall include, but not be limited to:

- (i) Erosion, settling, subsidence or other events that may affect the grading or integrity of an engineered control providing a cap on contaminated soil or waste in place;
- (ii) Integrity of the final cover materials, soils and vegetation;
- (iii) Drainage control; and
- (iv) Evidence of a release from the capped area, including leachate seeps.

The Permittees shall ensure inspections of remediation systems and engineered controls are performed on a quarterly basis or another schedule approved by the Commissioner by a registered professional engineer.

The Permittee shall record all inspections in an inspection log. The inspection logs shall include: the date and time of the inspection, the name of the inspector and company or affiliation, a notation of the observations made, and the date and nature of any repairs.

Such records shall be kept for at least three (3) years from the date of inspection or for longer if a more stringent condition applies, and maintained in either an electronic format with a copy available to the Commissioner upon request, or a written copy in the Facility's Operating Record.

- (d) Monitoring Obligations. The Permittees shall at all times properly operate and maintain all monitoring wells which are installed or used by the Permittees to achieve compliance with this Permit as described in the approved Long-Term Stewardship Plan. Proper maintenance, at a minimum, includes inspections to detect existing and potential problems and adequate funding to maintain proper conditions and repair any problems.

The Permittees shall perform surface and groundwater monitoring on a frequency specified in the approved Long-Term Stewardship Plan, and consistent with the constituents of concern. The monitoring frequency must be specified in the Long-Term Stewardship Plan and must be consistent with RCSA 22a-449(c)-104, incorporating 40 CFR 264. A summary of monitoring requirements must be included in the Long-Term Stewardship Plan.

The Permittees are authorized by the Commissioner, without any additional authorizations or permits, to extract, in accordance with the provisions of the General Permit for the diversion of Water for Consumptive Use, groundwater using the groundwater extraction systems identified in the Long-Term Stewardship Plan. Such authorization is limited to the scope and duration of this permit.

5. Notification Requirements for Newly Discovered Releases

- (a) The Permittees shall notify the Commissioner in writing of any newly discovered release(s) of solid or hazardous waste or hazardous waste constituents discovered during the course of long-term stewardship, groundwater monitoring, environmental audits, or other means, within fifteen (15) calendar days of the date of discovery.
- (b) If the Commissioner determines that further investigation of the Site is needed, the Permittees shall be required to prepare a plan for further investigation within sixty (60) calendar days of notification by the Commissioner.

6. Future Corrective Action

If the Commissioner determines that environmental data indicates the remediation was not effective, the Permittees shall within one hundred eighty (180) days of the Commissioner's notice, submit for the Commissioner's review and written approval, a plan for the additional characterization and establishment of a corrective action program.

7. Miscellaneous

- (a) For any substances reported at or emanating from the Site, for which no remediation criteria has been adopted under the Remediation Standard Regulations, the Permittees shall, in accordance with the Remediation Standard Regulations, submit for the Commissioner's review and written approval a proposal for additional remediation and establishment of criteria for additional polluting substances.
- (b) The Permittees shall not operate the Facility in any manner that stores, treats, or disposes of hazardous wastes or in any way manages hazardous wastes other than hazardous wastes that may be generated during Facility maintenance, and/or corrective action activities. Such waste shall be managed in accordance with all applicable regulations. The Permittees shall comply with all applicable requirements of RCSA Section 22a-449(c)-102 incorporating 40 CFR Part 262 "Standards Applicable to Generators of Hazardous Waste".

C. FINANCIAL RESPONSIBILITY

1. Cost Estimates

The Permittees shall submit for the Commissioner's review and written approval written estimate(s) for the current cost of performing corrective action and long-term stewardship of the Site or areas affected by the Site in accordance with the requirements of this Permit. The Permittees shall ensure that such written estimates are prepared in accordance with the methodology specified in RCSA 22a-449(c)-104 incorporating 40 CFR 264.142(a) and 40 CFR 264.144(a), as applicable.

Note a fifteen percent (15%) contingency shall be applied to the estimates for unforeseeable elements or events which may increase the cost of performing corrective action and long-term stewardship.

2. Establishment of Financial Assurance

In accordance with the time frame specified in the Compliance Schedule of this Permit, the Permittees shall establish and continually maintain financial assurance for the Facility in accordance with one of the methods specified in 40 CFR 264.143(a)-(g), as modified by 22a-449(c)-104(a) (2). The Permittees shall ensure that the wording of the financial assurance mechanism(s) secured for the purpose of compliance with this section of the Permit is identical to the wording specified in 40 CFR 264.151, as modified by 22a-449(c)-104(a)(2).

Such assurance may be established incrementally. The Permittees shall submit a plan for the Commissioner's review and written approval, for incrementally establishing financial assurance.

3. Inflationary Adjustments

The Permittees shall adjust amounts of financial assurance to reflect inflationary costs as required by RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.142, and any factors that bear on the cost of performing the work that remains to be completed under this Permit. Adjustments shall be made each year, on the anniversary of the establishment of the mechanism(s) for financial assurance until the Commissioner releases the Permittees from the financial assurance requirements of this Permit.

The latest adjusted cost estimate(s) shall be kept at the Facility and a signed original shall be submitted to the Commissioner within fourteen (14) calendar days of preparation.

4. Periodic Reductions

Upon request by the Permittees, the Commissioner may approve periodic reductions in the amount of financial assurance commensurate with the completion of corrective action activities. Such request shall include a revised cost estimate and demonstration of completed work activities which equates to at least a fifteen percent (15%) reduction in the estimate costs.

5. Maintenance of Financial Assurance

The Permittees shall maintain such financial assurances in effect until the Commissioner notifies the Permittees in writing that it is no longer required to maintain such a mechanism for financial assurances as provided for in this Permit.

6. Release of Financial Assurance

(a) Within sixty (60) calendar days after receiving certification, submitted pursuant to this Permit that Active Remediation has been completed in accordance with the approved RAP, the Commissioner will notify the Permittees in writing that they are no longer required to maintain financial assurance for remediation, unless the Commissioner has reason to believe that the remediation activities have not been performed and/or completed in accordance with the approved RAP. The Commissioner shall provide the Permittees with a detailed written statement of any

such reason(s) to believe that remediation activities have not been performed and/or completed in accordance with the approved RAP.

- (b) Within sixty (60) calendar days after receiving certification, submitted pursuant to this Permit that post-remediation groundwater monitoring has been completed in accordance with the approved Groundwater Monitoring Plan, the Commissioner will notify the Permittees in writing that they are no longer required to maintain financial assurance for post-remediation groundwater monitoring, unless the Commissioner has reason to believe that the groundwater monitoring has not been performed and/or completed in accordance with the approved Groundwater Monitoring Plan. The Commissioner shall provide the Permittees with a detailed written statement of any such reason(s) to believe that post-remediation groundwater monitoring has not been performed and/or completed in accordance with the approved plan.

7. Failure to Perform

If the Permittees fail to perform any of the terms or conditions of this Permit, the financial assurance shall be available to the Commissioner to perform such terms or conditions of this Permit provided that, prior to drawing upon any mechanism(s) for financial assurance, the Commissioner shall notify Permittees, in writing, of the alleged failure to perform and provide Permittees with a reasonable period of not less than fifteen (15) calendar days in which to remedy the alleged non-performance.

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SECTION III
COMPLIANCE SCHEDULE

LANXESS CORPORATION
and
BOROUGH OF NAUGATUCK

EPA ID No. TBD
Permit No. DEEP/REM/SP/2022-5030

SECTION III
COMPLIANCE SCHEDULE

A. RETENTION OF LICENSED ENVIRONMENTAL PROFESSIONAL

Within thirty (30) calendar days of the effective date of this Permit, the Permittees shall retain one or more LEPs acceptable to the Commissioner to oversee the activities and prepare the documents required by this Permit and shall, by that date, notify the Commissioner in writing of the identity of such LEP. The Permittee shall assign and/or retain such qualified LEP acceptable to the Commissioner, until the Permittee has fully complied with this Permit.

B. SCHEDULE OF WORK

Within sixty (60) calendar days of the effective date of this Permit, the Permittees shall submit for the Commissioner's review and written approval a proposed schedule for the submission and implementation of:

Item	Description
Completion of Investigation Report	Details the investigation of the site
Remedial Action Plan	Details the steps to be taken to perform corrective action
Remedial Action Report	Details the actions taken under the Remedial Action Plan
Cost Estimates	Revised cost estimate for completing corrective action and performing long-term stewardship obligations in accordance with the requirements of Section II of this Permit.
Long-Term Stewardship Plans and Reports	Maintenance and Monitoring Plans and Reports for Remediation Systems, Engineered Controls, Institutional Controls, Groundwater Monitoring

C. ESTABLISH AND MAINTAIN FINANCIAL ASSURANCE

Within one hundred fifty (150) calendar days of the Commissioner's approval of the cost estimate submitted in accordance with this Permit, the Permittees shall establish and continually maintain financial assurance by one or more of the instrument formats prescribed by the Commissioner for Final Closure of the regulated units and corrective action of the Facility or areas affected by the Facility.

D. ANNUAL PROGRESS REPORTS

Until all actions required by this Permit have been completed to the Commissioner's satisfaction, the Permittees shall submit a progress report for the Commissioner's review. The report will be prepared on a calendar-year basis. Each such report shall be submitted to the Department no later than March 1st of each year.

Such reports shall, at a minimum:

- Describe the actions which the Permittees have taken in the prior calendar year to comply with the terms and conditions of this Permit;

- Summarize with charts and graphs any exceedances of Remediation Standard Regulations criteria detected during monitoring;
- Identify the measures taken to correct the cause of any such exceedances of Remediation Standard Regulations;
- Summarize the results of any inspections of engineered controls and institutional controls;
- Summarize corrections taken to address deficiencies identified in inspections of remediation systems, engineered controls, and institutional controls;
- Recommend, as appropriate, modifications of groundwater monitoring plans and remedial systems; and
- Identify any planned work for the upcoming year.

The Commissioner may issue a notice of deficiency to require the modification and revision of the Annual Progress Report. The Annual Progress Report shall contain the certification prescribed in RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11, signed by the Permittees or Licensed Environmental Professional.

FIGURE 1
SITE PLAN WITH AREAS OF CONCERN

KEY:

- | | | |
|--|--|--|
| ① Hazardous Waste Container Storage Area #1 | ④② Building 94 | ⑤⑨ No. 6 Fuel Oil Tank |
| ② Hazardous Waste Storage Area #2 | ④③ Building 100 | ⑥⑩ Drum Rolloff |
| ③ Building 54 Laboratory Sample Storage Unit | ④④ Building 101E | ⑦⑪ Building 75 Tank Farm |
| ④ Temporary Drum Storage Unit | ④⑤ Building 101W | ⑧⑫ Building 79 Tank Farm |
| ⑤ Tank system (Tank 33C)/Tank Farm 109 | ④⑥ Building 109 | ⑨⑬ Building 88/94 Tank Farm |
| ⑥ Nonenes Underground Storage Tank | ④⑦ Building 111 | ⑩⑭ Building 120 Tank Farm |
| ⑦ Nonenes Aboveground Storage Tank | ④⑧ Building 112 Lab Waste Storage Area | ⑪⑮ Building 124 Tank Farm |
| ⑧ Waste Nonenes Storage Pad | ④⑨ Building 121 | ⑫⑯ Underground Acetone Storage Tank |
| ⑨ Tank System (Tank 135C) | ④⑩ Building 124 | ⑬⑰ Aniline Sludge Pits |
| ⑩ Drum Lot | ④⑪ Building 310 Lab Waste Storage Area | ⑭⑱ Unloading Docks |
| ⑪ Tire Lot | ④⑫ Building 317 | ⑮⑲ Coagulation Pit |
| ⑫ Pretreatment Plant Drain Line | ④⑬ Building 321 | ⑯⑳ Less than 90 Day Container Storage Area Unit #3 |
| ⑬ South Yard Fill Material | ④⑭ Building 321 | ⑰㉑ Fuel Tank System |
| ⑭ Ground Staining Bldgs. 601/604 | ④⑮ Building 617 | ⑱㉒ Trash and Cardboard Compactors |
| ⑮ Building 676 Concrete Vats | ④⑯ Building 618 | ㉓㉔ Facility Wide Dumpsters (Not Shown) |
| ⑯ Former Coal Storage Area | ④⑰ Building 668 | ㉕㉖ Site Wide Underground Piping System (Not Shown) |
| ⑰ Railroad Tie Storage Area | ④⑱ Building 677 | |
| ⑱ Pretreatment Plant - Equalization Tanks | ④㉑ Building 681 | |
| ⑲ Pretreatment Plant - Clarifier | | |
| ⑳ Pretreatment Plant - Lift Station | | |
| ㉑ Pretreatment Plant - Sludge Pit | | |
| ㉒ Material Storage Area | | |
| ㉓ Fire Training Area | | |
| ㉔ Building 84 Condensate Sump | | |
| ㉕ Building 81 Wastewater Sump | | |
| ㉖ Building 55 Condensate Sump | | |
| ㉗ River Sediment | | |
| ㉘ Building 47 | | |
| ㉙ Building 52 | | |
| ㉚ Building 54 | | |
| ㉛ Building 55 Drum Cleaning Area | | |
| ㉜ Building 58 | | |
| ㉝ Building 72 | | |
| ㉞ Building 73 | | |
| ㉟ Buildings 75 & 335 | | |
| ㊱ Building 79 | | |
| ㊲ Building 80 | | |
| ㊳ Building 81 | | |
| ㊴ Building 86 | | |
| ㊵ Building 88 | | |
| ㊶ Building 89 | | |

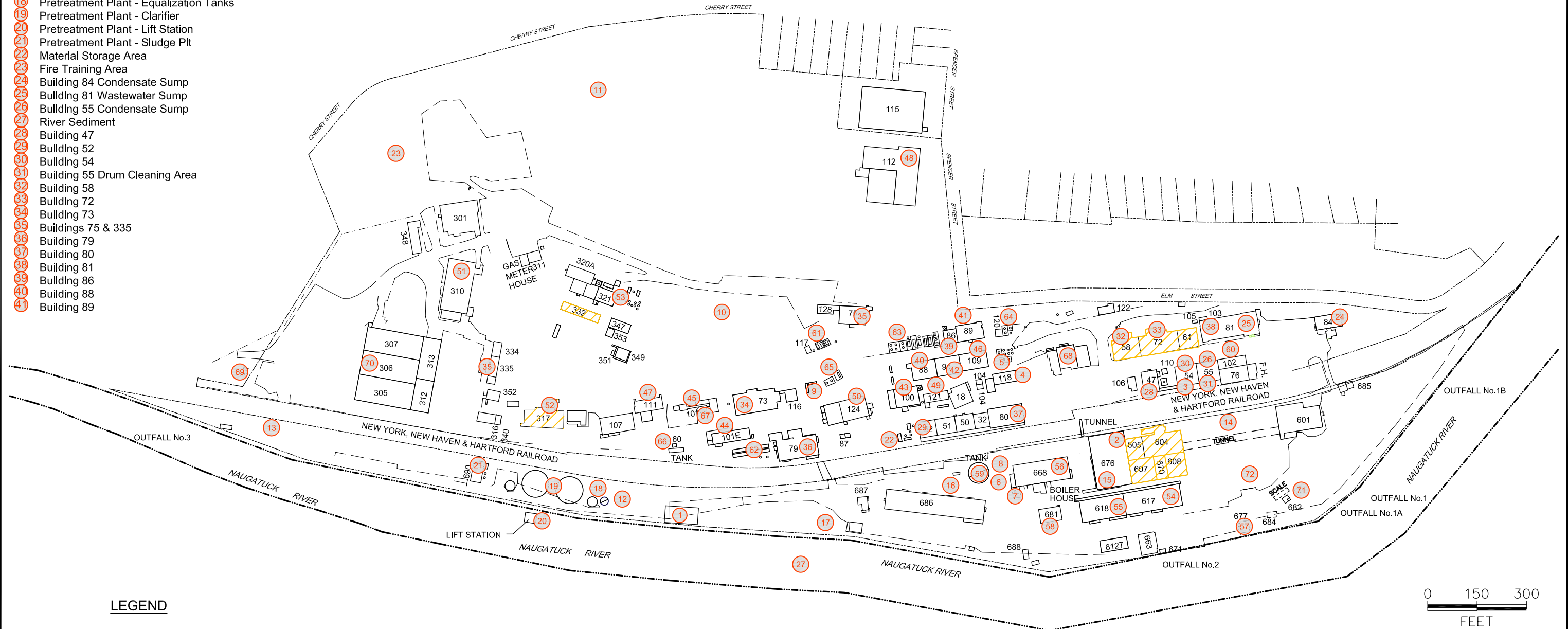
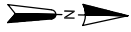


FIGURE 5
AOC LOCATIONS
CHEMTURA CORPORATION
NAUGATUCK, CONNECTICUT

TABLE 1

SOLID WASTE MANAGEMENT UNITS/AREAS OF CONCERN

**TABLE 1
LIST OF SOLID WASTE MANAGEMENT UNITS/AREAS OF CONCERN
FORMER UNIROYAL CHEMICAL FACILITY, NAUGATUCK, CT**

SWMU/AOC	DESCRIPTION
<p align="center"><u>AOC #1</u> Hazardous Waste Container Storage Area # 1</p>	<p>Storage area used to store 55-gallon drums of site-related waste from 1980 to 1999. Consists of 50 ft. X 200 ft. asphalt pad with concrete berm. Three catch basins used to direct runoff to PTP.</p> <p>Former Designation: SWMU #1 (W&C 1993), Hazardous Waste Container Storage Area #1 (CRA 2000)</p>
<p align="center"><u>AOC #2</u> Hazardous Waste Storage Area # 2</p>	<p>Storage area used to temporarily store 55-gallon drums of site related waste from 1980 to 1999. Consists of 18 ft. x 54 ft. area in the NW corner of Building 676. No constructed secondary containment. The storage area was marked by yellow painted boundaries on concrete floor and concrete block wall.</p> <p>Former Designation: SWMU #2 (W&C 1993), Hazardous Waste Storage Area #2 (CRA 2000)</p>
<p align="center"><u>AOC #3</u> Building 54 Laboratory Sample Storage Unit</p>	<p>Storage area used to store and consolidate liquid wastes from laboratory processes. Consists of 28 ft. x 70 ft. area on concrete floor with painted boundary lines. No constructed secondary containment, no floor drains.</p> <p>Former Designation: SWMU #3 (W&C 1993), Laboratory Sample Storage Unit (CRA 2004)</p>
<p align="center"><u>AOC #4</u> Temporary Drum Storage Unit.</p>	<p>Storage area used for temporary storage of 55-gallon drums of site-related waste on a flatbed trailer prior to transportation to AOC #1 or AOC #2. Area consists of 50 ft. x 50 ft. asphalt pad with curbing north of Building 118. One catch basin is used to direct spills and/or runoff to the PTP.</p> <p>Former Designation: SWMU #4 (W&C 1993), Temporary Drum Storage Area (CRA 2000)</p>
<p align="center"><u>AOC #5</u> Tank System (Tank 33C)/Tank Farm 109</p>	<p>12,000 gallon AST for the storage of waste nonenes. Secondary containment consists of 10 ft. concrete wall and catch basin to direct spills/runoff to PTP.</p> <p>Additional ASTs for the storage of bulk chemicals including DPA, hydrazine, Naugard P, Paracresol, phosphorous trichloride, phenol, polygard, propyl alcohol, sodium hypochlorite, and sulfuric acid.</p> <p>Former Designation: SWMU #5 (W&C 1993), Waste Nonenes Tank System (CRA 2000)</p>
<p align="center"><u>AOC #6</u> Nonenes Underground Storage Tank</p>	<p>13,000 gallon UST for the storage of waste nonenes prior to blending with No. 6 Fuel Oil for subsequent burning.</p> <p>Former Designation: SWMU #6 (W&C 1993), Nonenes UST (CRA 2000)</p>
<p align="center"><u>AOC #7</u> Nonenes Above Ground Storage Tanks</p>	<p>Unit consisted of one nonenes decanter AST and two nonenes blend tanks. All three ASTs within 2 ft. high concrete berm. Catch basin and piping directed spills and/or runoff to PTP.</p> <p>Former Designation: SWMU #7 (W&C 1993), Nonenes ASTs Unit (CRA 2000)</p>
<p align="center"><u>AOC #8</u> Waste Nonenes Storage Pad</p>	<p>The pad consists of a 25 ft. x 40 ft. asphalt pad with a 6-inch asphalt berm on 3 sides. A catch basin is present to transport spills and/or runoff to the PTP.</p> <p>Former Designation: SWMU #16 (W&C 1993), Nonenes Tanker Unloading Area (CRA 2004)</p>
<p align="center"><u>AOC #9</u> Tank System (Tank No. 135C)/Tank Farm 124</p>	<p>12,000 gallon AST for the storage of distillate tar residues and other waste products from plant operations. Secondary containment consists of 13 ft. high concrete wall with concrete base. Catch basin and piping to direct spills and/or runoff to PTP.</p> <p>Former Designation: SWMU #8 (W&C 1993), Tank 135C (CRA 2004)</p>
<p align="center"><u>AOC #10</u> Drum Lot</p>	<p>This area was historically used to store unclean "RCRA Empty" drums for reuse. Up to 30,000 drums stored at times.</p> <p>Former Designation: SWMU #9 (W&C 1993)</p>
<p align="center"><u>AOC #11</u> Tire Lot</p>	<p>19-acre fenced earthen lot that was used from 1915 to the mid-1950s for the storage of tires and tire beads, as well as for the disposal of a wide variety of solid wastes, including boiler ash, construction debris, scrap rubber, iron sludge, and chemical waste.</p> <p>Former Designation: SWMU #10 (W&C 1993)</p>
<p align="center"><u>AOC #12</u> Pretreatment Plant Drain Line</p>	<p>PTP constructed in 1974 to process facility-wide waste water and storm water runoff prior to discharge. In 2002, the main drain pipe from the PTP was inspected and observed to be damaged. The pipe was repaired.</p> <p>Suspected Groundwater contamination from this AOC.</p> <p>Former Designation: SWMU #11 (W&C 1993)</p>
<p align="center"><u>AOC #13</u> South Yard Fill Materials</p>	<p>Disposal of fly ash and iron oxide sludge over several acres in the South Yard from the production of aniline.</p> <p>Former Designation: SWMU #11 (W&C 1993)</p>
<p align="center"><u>AOC #14</u> Ground Staining – Buildings 601/604</p>	<p>Black fibrous material observed on the ground between Bldgs. 601 and 604.</p> <p>Former Designation: SWMU #12 (W&C 1993)</p>

TABLE 1
LIST OF SOLID WASTE MANAGEMENT UNITS/AREAS OF CONCERN
FORMER UNIROYAL CHEMICAL FACILITY, NAUGATUCK, CT

SWMU/AOC	DESCRIPTION
<u>AOC #15</u> Building 676 Concrete Vats	Several concrete floor vats of black sticky material on the first floor of Bldg. 676. Former Designation: SWMU #13 (W&C 1993)
<u>AOC #16</u> Former Coal Storage Area	Coal was stored on the ground west of Building 668. Former Designation: SWMU #17 (W&C 1993)
<u>AOC #17</u> Railroad Tie Storage Area	Area used for storage of railroad ties. Approximately 100 railroad ties observed on the ground in 1993. Former Designation: SWMU #18 (W&C 1993)
<u>AOC #18</u> Pretreatment Plant Equalization Tanks	Two 250,000 gallon tanks in the south yard used to provide steady flow of influent to the PTP. Tank bottoms consist of concrete with epoxy coating. Former Designation: SWMU #19 (W&C 1993)
<u>AOC #19</u> Pretreatment Plant Clarifiers	Two 650,000 gallon ASTs in the south yard used to aid in sludge removal from the PTP waste stream. Tank bottoms consist of concrete with epoxy coating. Former Designation: SWMU #20 (W&C 1993)
<u>AOC #20</u> Pretreatment Plant Lift Station	Two 15,000 gallon ASTs used to raise the pH of the PTP influent prior to treatment. Former Designation: SWMU #21 (W&C 1993)
<u>AOC #21</u> Pretreatment Plant Sludge Pit	10,000 gallon sump for the removal of sludge from the PTP flow stream. Former Designation: SWMU #22 (W&C 1993)
<u>AOC #22</u> Material Storage Area	Storage area for materials stored in drums that needed further processing. Material stored on gravel surface. Former Designation: SWMU #29 (W&C 1993)
<u>AOC #23</u> Fire Training Area	Two large concrete pits in the Tire Lot (AOC #11). Former Designation: SWMU #34 (W&C 1993)
<u>AOC #24</u> Building 84 Condensate Sump	Concrete sump in basement of Building 84. Former Designation: SWMU #23 (W&C 1993)
<u>AOC #25</u> Building 81 Wastewater Sump	Concrete sump in basement of Building 81. Former Designation: SWMU #24 (W&C 1993)
<u>AOC #26</u> Building 55 Condensate Sump	Concrete sump in basement of Building 55 for the removal of condensation from equipment and sink discharge waters. Former Designation: SWMU #25 (W&C 1993)
<u>AOC #27</u> Naugatuck River Sediment	Sediments adjacent to historic storm and waste water discharge points. Former Designation: Naugatuck River Sediments (W&C 1993)
<u>AOC #28</u> Building 47	Building 47 was part of the non-manufacturing operations on-site. Floor trenching was identified during 1993 RFA. Former Designation: SWMU #41 (W&C 1993)
<u>AOC #29</u> Building 52	Building 52 was part of the non-manufacturing operations on-site. One parts cleaning unit was identified during 1993 RFA. Former Designation: SWMU #45
<u>AOC #30</u> Building 54	Building 54 was part of latex production from early 1940's to 1975. Three baghouse filter systems identified during 1993 RFA. Baghouse filters used to filter airborne material and funnel captured material into lever packs. Packs then sent to hazardous waste storage area for off-site disposal. Former Designation: SWMU #30 and SWMU #43 (W&C 1993)
<u>AOC #31</u> Building 55 Drum Cleaning Area	Operations conducted on first floor of Building 55. Drums cleaned using Oakite, NaOH, and water. Former Designation: SWMU #26 (W&C 1993)

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LIST OF SOLID WASTE MANAGEMENT UNITS/AREAS OF CONCERN
FORMER UNIROYAL CHEMICAL FACILITY, NAUGATUCK, CT

SWMU/AOC	DESCRIPTION
<u>AOC #32</u> Building 58	Building 58 contained a chemical pilot plant that operated from the early 1950's to the early 1980's. Building 58 was demolished in 2000/2001. Floor trenching observed during 1993 site inspection. Former Designation: SWMU #41 (W&C 1993)
<u>AOC #33</u> Building 72	Building 72 contained a chemical pilot plant that operated from the early 1950s to the early 1980s. Building 72 has been removed. Floor trenching, inactive baghouse filter and inactive scrubber systems observed during 1993 site inspection. Former Designation: SWMU #41, SWMU #43, and SWMU #44 (W&C 1993)
<u>AOC #34</u> Building 73	Building 73 was part of the manufacturing operations on site. Specifically, products underwent additional processing after initial production. Baghouse filters used to filter airborne material and funnel captured material into lever packs. Packs then sent to hazardous waste storage area (AOC #1 or #2) for off-site disposal. Four baghouse filters identified during 1993 RFA. Former Designation: SWMU #43 (W&C 1993)
<u>AOC #35</u> Buildings 75 & 335	Buildings 75 and 335 were historically leased to Modern Metal Finishing Co. to conduct metal anodizing and other coating processes. Former Designation: SWMU #28 (W&C 1993)
<u>AOC #36</u> Building 79	Building 79 was used for chemical processing of antioxidants. Floor trenching, baghouse filter, and 2 scrubber systems observed during 1993 site inspection. Adjacent to Building 79 tank farm (AOC #62) Former Designation: SWMU #41, SWMU #42, SWMU #43, SWMU #44 (W&C 1993)
<u>AOC #37</u> Building 80	Building 80 was part of the non-manufacturing operations on site. One baghouse filter and one inactive scrubber system identified during 1993 RFA. Former Designation: SWMU #43 (W&C 1993)
<u>AOC #38</u> Building 81	Building 81 has been used as part of the non-manufacturing operations on-site and is still currently active and used for records storage and office space. Fume hoods and transport carts identified during 1993 RFA. Former Designation: SWMU #38 (W&C 1993)
<u>AOC #39</u> Building 86	Building 86 was used for on-site manufacturing. Floor trenching observed within the building. Former Designation: None
<u>AOC #40</u> Building 88	Building 88 was used for chemical processing of multiple compounds including accelerators, activators, and antioxidants. Two baghouse filter systems and four scrubber systems identified during 1993 RFA. Former Designation: SWMU #43 and SWMU #44 (W&C 1993)
<u>AOC #41</u> Building 89	Building 89 was used for on-site manufacturing. Floor trenching observed within the building. Former Designation: None
<u>AOC #42</u> Building 94	Building used for the chemical processing of accelerators. Scrubber system identified during 1993 RFA. Floor trenching observed within the building. Former Designation: SWMU #44
<u>AOC #43</u> Building 100 and Tank Farm	Building used for chemical processing of various chemicals including Naugalube 438L, non-stainers, and Omite. Cylindrical filter units and 3 scrubber systems identified during 1993 RFA. Former Designation: SWMU #27, SWMU #41, SWMU #42, and SWMU #44 (W&C 1993)
<u>AOC #44</u> Building 101E	Building used for on-site drying, grinding, milling and packaging processes involving the handling of various chemicals including Naugard and BLE-75. Equipment washout area present within the building. Baghouse filter identified during 1993 RFA. Former Designation: SWMU #32, SWMU #42, and SWMU #43 (W&C 1993)
<u>AOC #45</u> Building 101W	Building 101W was part of the manufacturing operations on site. Specifically, products underwent additional processing after initial production. Waste drums and one baghouse filter identified during 1993 RFA. Former Designation: SWMU #42 and SWMU #43

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FORMER UNIROYAL CHEMICAL FACILITY, NAUGATUCK, CT**

SWMU/AOC	DESCRIPTION
<u>AOC #46</u> Building 109	Building 109 was used for the chemical processing of antioxidants including AO449N, Cyclohexene, Cyclohexene Oxide, Dinonenes, Naugard 492, Naugard 512, Naugard P, Polygard, and UMNO. Waste drums and/or barrels and 2 scrubber systems identified during 1993 RFA. Former Designation: SWMU #42 and SWMU #44 (W&C 1993)
<u>AOC #47</u> Building 111	Building 111 was used as part of the non-manufacturing operations on-site. Fume hoods and transport carts identified during 1993 RFA. Former Designation: SWMU #38 (W&C 1993)
<u>AOC #48</u> Building 112 Lab Waste Storage Area	Building 112 has been used as part of the non-manufacturing operations on site and is still currently active. Laboratory waste storage area located in Building 112 served as a RCRA regulated <90-day storage facility. Also includes fume hoods and chemical transport carts identified during 1993 RFA. One parts cleaner identified during 1993 RFA. Former Designation: SWMU #35, SWMU #38, and SWMU #45 (W&C 1993)
<u>AOC #49</u> Building 121	The floor of Building 121 historically exposed to brine and brine treatment chemicals. Former Designation: SWMU #30 (W&C 1993)
<u>AOC #50</u> Building 124	Building 124 was used for chemical processing including 438L, Durazone, Naugard SFR, and WAND (chlorinated ester). Waste drums and/or barrels, 1 baghouse filter, and 2 scrubber systems identified during 1993 RFA. Former Designation: SWMU #42, SWMU #43, and SWMU #44 (W&C 1993)
<u>AOC #51</u> Building 310 Lab Waste Storage Area	Building 310 has been used as part of the non-manufacturing operations on-site and is still currently active. Laboratory waste storage area located in Building 310 served as a RCRA regulated <90-day storage unit. Also includes fume hoods and chemical transport carts identified during 1993 RFA. Former Designation: SWMU #33, SWMU #38, and SWMU #42 (W&C 1993)
<u>AOC #52</u> Building 317	Building 317 used for chemical processing including n-DPA, DPA, and flexamine. Building taken out of service in 1990 and demolished in 2000. Former Designation: Building 317
<u>AOC #53</u> Building 321/Building 321 Tank Farm	Building 321 was used for on-site manufacturing. Floor trenching observed within the building. Former Designation: SWMU # 41 (W&C 1993)
<u>AOC #54</u> Building 617	Building 617 was used as part of the non-manufacturing operations on-site. Two parts cleaning units were identified during the 1993 RFA. Former Designation: SWMU #45
<u>AOC #55</u> Building 618	Building 618 was used as part of the non-manufacturing operations on-site. Five parts cleaning units were identified during 1993 RFA. Former Designation: SWMU #45
<u>AOC #56</u> Building 668	Building 668 is the facility Boiler House. Historically fuel for boilers was fuel oil as well as a mixture of #6 Fuel Oil and nonenes for recycling of nonene wastes. One parts cleaner and one fly ash hopper identified during 1993 RFA. Former Designation: SWMU #15 and SWMU #45 (W&C 1993)
<u>AOC #57</u> Building 677	Floor trenching was identified within Building 677 during 1993 RFA. Former Designation: SWMU # 41 (W&C 1993)
<u>AOC #58</u> Building 681	Building 681 was used as part of the non-manufacturing operations on-site. One 55-gallon waste oil drum containing waste oil from Building 681 machinery identified during 1993 RFA. Former Designation: SWMU #14
<u>AOC #59</u> No. 6 Fuel Oil Tank	No. 6 fuel oil used in boiler house. Above ground storage tank located adjacent to boiler house (referenced in RFA W&C 1993 SWMU #6). Former Designation: None
<u>AOC #60</u> Drum Rolloff	Rolloff adjacent to Building 55 for the disposal of cleaned drums. Rolloff no longer on-site. Former Designation: SWMU #37 (W&C 1993)

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SWMU/AOC	DESCRIPTION
<u>AOC #61</u> Building 75 Tank Farm	Storage of bulk chemicals including Hydrochloric acid, xylene, and 2-ME. Former Designation: None
<u>AOC #62</u> Building 79 Tank Farm	Multiple above ground storage tanks located south of Building 79 (AOC #36). Storage of bulk chemicals including acetone, aniline, DPA, and BLE. Former Designation: SWMU #31 Acetone Storage Tank (W&C 1993).
<u>AOC #63</u> Building 88/94 Tank Farm	Storage of bulk chemicals including Nonenes, dimethyl-hylamine, propylene oxide, heptane, caustic, Naugalube 438 L, antioxidant AO451 sludge, zinc water, ethylchloride, formaldehyde, and diisobutylene. Former Designation: None
<u>AOC #64</u> Building 120 Tank Farm	Storage of bulk chemicals. Former Designation: None
<u>AOC #65</u> Building 124 Tank Farm	Storage of bulk chemicals including Naugard SFR Wastewater, triacetoneamine, ethylbenzene, hexanol, High pH waste, aluminum chloride solution, and carbon bisulfide. (Excludes Tar Storage Tank). Former Designation: None
<u>AOC #66</u> Former Underground Acetone Storage Tank	35,000 gallon UST installed in 1998 for the storage of acetone. Located south of Building 79 and Building 79 Tank Farm. Former Designation: None
<u>AOC #67</u> Aniline Sludge Pits	Two 30 ft. x 20 ft. aniline sludge pits located south of Building 73 used historically for dewatering liquid aniline waste. Sludge generated by the dewatering was disposed in the South Yard (iron oxide sludge). Both pits were scraped out and backfilled in the mid-1950s. Former Designation: SWMU #46 Aniline Sludge Pits (W&C 1995)
<u>AOC #68</u> Unloading Docks	Three unloading docks used historically for the transfer of bulk chemicals for use in production processes. Former Designation: None
<u>AOC #69</u> Coagulation Pit	Coagulation pit used for the coagulation of effluent material from the SBR rubber processing operations. Former Designation: None
<u>AOC #70</u> Less Than 90 Day Container Storage Area Unit #3	This container storage area is located in Building 306. The area was constructed in 2000 for the temporary storage of investigation and remediation derived wastes. The Storage Area is currently active. Former Designation: None
<u>AOC #71</u> Former Fuel Tank System	Two USTs, one 6,000 gallon unleaded gasoline tank and one 1,000 gallon diesel fuel tank used for fueling facility vehicles. System consisted of the two USTs, a concrete vehicle pad with catch basin, and a 5,000 gallon oil/water separator installed in 1997. Discharge from oil/water separator to site stormwater system. Former Designation: None
<u>AOC #72</u> Trash and Cardboard Compactors	Two electric trash compactors located in open area between buildings 617 and 682. Former Designation: SWMU #36 (W&C 1993)
<u>AOC #73</u> Facility Wide Dumpsters	Dumpsters located throughout facility for disposal of general refuse including cardboard, packaging, misc. non-chemical solids, and general trash. Former Designation: SWMU #39 (W&C 1993)
<u>AOC #74</u> Site Wide Underground Piping System	Facility-wide piping connected each building to main pipe. Historically, discharge was directed to Naugatuck River. Piping connected to PTP in 1974. Former Designation: SWMU #40
<u>AOC #75</u> Combined PCB Investigation Area	Combined area containing PCB impacts from materials management from other AOCs during site demolition activities including Building 317, the Reclaim Building, and Reclaim Building Transformer Area.
<u>AOC #76</u> Ecological Risk – MW-3 Area Metals Impacts	Metals impacts to groundwater were identified as part of the Ecological Risk Assessment. Shallow groundwater at MW-3 is impacted with Cadmium, Copper and Zinc above applicable criteria.