

Stewardship Permit

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

Permittee:

Plainville Plating Company
21 Forestville Avenue
Plainville, CT 06062

Facility Identification:

EPA ID No. CTD001149459
Permit Number: DEEP/REM/SP/2021-5998

To perform site-wide environmental investigation and cleanup at the permitted 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 Permittee to perform post-closure care of the regulated surface impoundments and complete environmental investigation and cleanup (“post-closure” and “corrective action” measures required by the Resource Conservation and Recovery Act). The permit does not authorize operation of a hazardous waste management facility in the sense of treating, storing, or disposing of hazardous wastes 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 et seq. of the RCSA incorporating with changes 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. 201912974) filed on October 31, 2019. The Permittee 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 Permittee may result in the suspension, revocation or modification of this permit and civil or criminal enforcement action.

The Permittee shall comply with all terms and conditions contained in the permit. Any violation of any provision of this permit may subject the Permittee 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 Permittee 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 Permittee 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 activities. Any application shall be approved in writing by the Commissioner prior to the Permittee implementing such change. The Permittee 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.

In the event of a conflict between any previously issued 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.

June 2, 2021

Date

Katie S. Dykes

Katie S. Dykes

Commissioner

Department of Energy and Environmental Protection

Plainville Plating Company
21 Forestville Avenue
Plainville, CT

Permit No. DEEP/REM/SP/2021-5998
EPA ID No. CTD001149459

**STEWARDSHIP PERMIT
PLAINVILLE PLATING COMPANY
21 FORESTVILLE RD
PLAINVILLE, CT**

**EPA ID No. CTD001149459
Permit No. DEEP/REM/SP/2021-5998**

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21 Forestville Avenue
Plainville, CT

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SECTION I

**STEWARDSHIP PERMIT
STANDARD FACILITY CONDITIONS**

**PLAINVILLE PLATING COMPANY
21 FORESTVILLE AVENUE, PLAINVILLE, CT**

**EPA ID No. CTD001149459
Permit No. DEEP/REM/SP/2021-5998**

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 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 Title 40 of the Code of Federal Regulations (“40 CFR”) Parts 270.41, 270.42 and 270.43.

The Permittee shall perform the activities required in Section II of this Permit in accordance with the application (Application No. 201912974) received by the Department of Energy and Environmental Protection (Department) on October 31, 2019 and the requirements of this Permit. In the event of a conflict between the Permittee’s 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” paragraph of this Permit.

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

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 Permittee 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 Permittee shall comply with all conditions of this Permit except that the Permittee 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 Permittee 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 Permittee 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 Permittee shall renew this Permit if any activity required under this Permit is not completed prior to the expiration date of this Permit. The Permittee 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 Corrective Action, Post-Remediation Requirements, Post-Closure Care, Long-Term Stewardship Controls

The Permittee is required to continue this Permit for any period necessary to comply with any outstanding or remaining post-closure and corrective action requirements, as specified in Section II 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 Permittee 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 Permittee 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 Permittee 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 Permittee.

8. Duty to Provide Information

The Permittee 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 Permittee 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 Permittee 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 Permittee to achieve compliance with the conditions of this Permit. 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 Permittee 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 Permittee shall prevent the unknowing entry, and minimize the possibility for unauthorized entry, of persons or livestock onto the active portion of the Facility. The Permittee shall secure the Facility to the extent necessary to protect human health.

12. Preparedness, Prevention, Contingency Plan and Emergency Procedures

- (a) The Permittee 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 Permittee 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 Permittee shall maintain a copy of such Permit in the operating record for its Facility. The Permittee 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 Permittee shall ensure that each entity under contract with the Permittee to provide emergency response services visits the Site annually so that such entity is familiar with the Permittee's Site and can respond to an emergency. The Permittee 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 Permittee to provide emergency response services, stating that such entity has complied with the requirements specified in this paragraph.

13. Monitoring and Records

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

The Permittee 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. For disposal facilities these records shall be maintained for the post-closure period.

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

- (a) 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;
- (b) 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); and
- (c) Any other information required by this Permit or by any applicable law to be maintained in the Facility Operating Record.

15. Signatory Requirements

The Permittee's application and all reports or information submitted to the Commissioner by the Permittee pursuant to this Permit shall be signed by the person specified (signatory) in and contain the certification prescribed in RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11. The signatory may authorize in writing an individual or a position title to submit reports with the certification on the signatory's behalf. The signatory should submit such authorization in writing to the department.

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 Permittee 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 Permittee 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 Permittee 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 Permittee shall provide such prospective new owner or operator with a copy of this Permit.

The Permittee's 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 Permittee retains this Permit, an access agreement between the Permittee 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 Permittee to complete closure, post-closure care and corrective action activities and conduct inspection, operation and management activities for all remedial systems. A copy of the Operations and Management Plan shall be provided to the prospective new owner prior to transfer of the property.

17. Reporting Requirements

(a) Anticipated Non-Compliance. The Permittee 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) Twenty four Hour Reporting.

(i) The Permittee 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 Permittee becomes 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 Permittee;
 - (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 Permittee becomes 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 Permittee 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 Permittee of its obligations under CGS Sections 22a-6u or 22a-450.
- (d) Other Noncompliance. The Permittee shall report all instances of noncompliance with this Permit not otherwise required to be reported by this Permit to the Commissioner along with any other required monitoring report, no later than

thirty (30) days of the date the Permittee is aware, or reasonably should have been aware of any such noncompliance. Any such report shall contain, at a minimum, the information listed in Condition No. I.E.17.(c)(i).

- (e) Other Information. When the Permittee becomes aware that it 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, it 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 Permittee 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 Permittee's 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 Permittee of its obligation to comply with any other applicable federal, state, or local statute, regulation or ordinance.

22. Modification of the Compliance Schedule

The Permittee 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 Permittee's 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 Permittee.

23. Delegation of a Licensed Environmental Professional

Pursuant to RCSA Section 22a-133v, the Department may delegate a licensed environmental professional (LEP) who, if delegated, may verify that site-wide environmental investigation at the Facility has been performed in accordance with prevailing standards and guidelines and remediation activities have addressed any and all requirements of the Commissioner and have achieved compliance with the RSRs.

The Commissioner may delegate the site-wide environmental, investigation, corrective action, and post closure care to a licensed environmental professional (LEP), licensed pursuant to RCSA Section 22a-133v. In that case, such LEP shall verify that site-wide environmental investigation at the Facility has been performed in accordance with prevailing standards and guidelines and remediation activities have addressed any and all requirements of the Commissioner and have achieved compliance with the Remediation Standard Regulations. Pursuant to RCSA Section 22a-133v, a licensed environmental professional (LEP) ~~shall~~ may verify that site-wide environmental investigation at the Facility has been performed in accordance with prevailing standards and guidelines and remediation activities have addressed any and all requirements of the Commissioner and have achieved compliance with the Remediation Standard Regulations.

- (a) In the event the Commissioner revokes the LEP delegation then the Permittee shall ensure all reports and documents required by this Permit are submitted for the Commissioner's review and written approval within the timeframes specified.
- (b) The Permittee shall notify the Commissioner in writing of the identity of any LEP other than the one 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 Permittee 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.

24. Approvals

Permittee shall use best efforts to submit to the Commissioner all documents required by this permit in a complete and approvable form. In approving any document or other action under this permit, the Commissioner may approve the

document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this permit.

If the Commissioner notifies the Permittee that any document or other action required by this permit is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Permittee shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies.

If such corrections or modifications are not made within such timeframe to finalize the document or action, then the department may seek resolution through enforcement of this permit.

Nothing in this paragraph shall excuse noncompliance or delay.

F. DEFINITIONS

Any term not otherwise defined herein shall be defined as that term is defined in RCSA 22a-449(c)-100 thru 119 incorporated 40 CFR 264 through 279.

1. “Active Remediation” or “Active Remedial Activities” shall mean the period prior to completion of activity conducted pursuant to Section II.B. of this Permit, with the exception of that period when the only remaining activity is post-remedial monitoring or monitored natural attenuation.
2. “Annual” shall mean that sampling and analysis shall occur no later than December 31st if 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 having a probable release of a hazardous waste or hazardous constituents and is determined by the Department to pose a current or potential threat to human health or the environment.
4. “Constituent of Concern” or “Constituent of Concern”—a component, breakdown product, or derivative of a substance that may be found in the environment as a result of a release or a reaction caused by such a release. “CFR” shall mean the Code of Federal Regulations in effect on the date that this Permit is issued.
5. “CFR” shall mean the Code of Federal Regulations in effect on the date that this Permit is issued.
6. “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.
7. “Department” or “DEEP” shall mean the Connecticut Department of Energy and Environmental Protection.
8. “Discover,” “Discovery,” or “Discovered” refer to the date on which the Permittee either: (i) visually observes evidence of a new Solid Waste Management Unit (SWMU) or Area of Concern (AOC), (ii) visually observes evidence of a previously unidentified release of hazardous constituents to the environment, (iii) receives information which suggests the presence of a new release of hazardous waste or hazardous constituents to the environment, or (iv) receives information which suggests the presence of a previously undocumented release of hazardous waste or hazardous waste constituents to the environment.)
9. “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 June 27, 2013 (amended ELUR Regulations)
10. “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.

For the purposes of the Permit, Facility shall mean the 2.3-acres of land located at 21 Forestville Avenue in Plainville, Connecticut consisting of the 1.87 acre of land (Parcel ID 26-B-21 in the town land records) and the adjacent parcel (Parcel ID 26-B-22)

currently used as a parking lot, as delineated on Figure No. 1 and subject to the requirements of this Permit.

11. “Final Closure” means the completion of the closure of all Hazardous Waste Management Units at the Permittee’s Facility in accordance with the requirements of this Permit.
12. “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.
13. “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.

For the purposes of this Permit, Hazardous Waste Management Unit shall mean the Surface Impoundment as defined below.
14. “Permittee” shall mean the person responsible for the overall operation of the facility who has 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.
15. “Period of Active Remediation” shall mean the period of time prior to the completion of remedial activity conducted pursuant to this Permit, with the exception of that period when the only remaining activity is post-remediation monitoring and monitored natural attenuation.
16. “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). For the purposes of this permit, the start date of the Post-Closure Period is December 7, 1989. In the event the waste is removed, an alternate post-closure period may be approved by the Commissioner.
17. “Quarterly” shall mean that sampling and analysis shall occur once every three (3) consecutive months in a calendar year (i.e. January, April, July and October). The results of such sampling and analysis shall be submitted to the Commissioner within sixty (60) calendar days of the date of sampling.
18. “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.
19. “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 June 27, 2013 and as otherwise amended.
20. “Semi-annual” shall mean that sampling and analysis shall occur during the months of April and October of each calendar year. The results of such sampling and analysis shall be submitted to the Commissioner within sixty (60) calendar days of the date of sampling.

21. “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.
22. “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 he 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.
23. “Surface Impoundment” means the approximately 95 ft by 172 ft by 12 ft high area located along the northern portion of the Facility comprised of the former settling lagoon and the two smaller sludge drying beds that were used for the disposal of approximately 3,000 cubic yards of metal hydroxide sludge (F006). This area has been closed and is regulated as a RCRA landfill.

Plainville Plating Company
21 Forestville Avenue
Plainville, CT

Permit No. DEEP/REM/SP/2021-5998
EPA ID No. CTD001149459

SECTION II

**STEWARDSHIP PERMIT
AUTHORIZED ACTIVITIES**

**PLAINVILLE PLATING COMPANY
21 FORESTVILLE AVENUE
PLAINVILLE, CT**

**EPA ID No. CTD001149459
Permit No. DEEP/REM/SP/2021-5998**

SECTION II AUTHORIZED ACTIVITIES

A. POST-CLOSURE REQUIREMENTS

1. Post-Closure Care and Groundwater Monitoring Plan.
The Permittee shall prepare and submit for the Commissioner's review and written approval a revised Post-Closure Plan for the Surface Impoundment inclusive of maintenance and monitoring of the RCRA cap and surface and groundwater monitoring.
2. Revised Plans
If at any time the Commissioner or the Permittee determines that a revision to the Post-Closure Plan is needed or required, the Permittee shall prepare and submit for the Commissioner's review and written approval a revised post-closure plan in accordance with the requirements set forth in 40 CFR 264 Subpart F.
3. Modifications to Approved Plans
The Permittee shall submit a written notification or request for a permit modification to authorize a change in the approved Post-Closure 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 post-closure plan for the Commissioner's review and written approval.
4. Copy of Approved Plans
The Permittee shall ensure that a copy of the approved Post-Closure Plan is kept at the Facility or at an alternate location acceptable to the Commissioner, until the Post-Closure Care Period has been completed and certified in accordance with the requirements of this Permit.
5. Proper Operation and Maintenance
The Permittee shall at all times properly operate and maintain all monitoring wells which are installed or used by the Permittee to achieve compliance with this permit. Proper maintenance, at a minimum, includes inspections to detect existing and potential problems and adequate funding to maintain proper conditions and repair any problems with the Surface Impoundment.
6. Monitoring Frequency
The Permittee shall perform surface and groundwater monitoring in accordance with the frequency specified in the approved Post-Closure Plan.
7. Notification Requirements for Newly Discovered Releases
 - (a) The Permittee 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 post-closure care, 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 Permittee shall be required to prepare a plan for further investigation within sixty (60) calendar days of notification by the Commissioner.
8. Inspections
 - (a) The Permittee shall inspect the Surface Impoundment for malfunctions, deterioration, and discharges, which may lead to any release of hazardous or

solid wastes. The Permittee shall remedy any deterioration that an inspection reveals, to ensure that the problem does not lead to an environmental hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

- (b) The Permittee shall ensure inspections are performed in accordance with the Post-Closure Plan overseen or under the direction of a registered professional engineer. Such inspections shall include, but not be limited to:
 - (i) Erosion, settling, subsidence or other events that may affect the grading;
 - (ii) Integrity of the cap and final cover soils and vegetation;
 - (iii) Drainage control;
 - (iv) Groundwater monitoring systems.
- (c) 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.

B. RCRA CORRECTIVE ACTION REQUIREMENTS

1. Performance of Corrective Action

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

The Permittee shall ensure that further investigations for each Solid Waste Management Units ("SWMUs") and Areas of Concern ("AOCs") are completed within two (2) years from the date of initiation of such investigation; and that remediation is initiated within three (3) years from the date of initiation of investigation 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) SWMUs and AOCs as identified in Table II-1;
- (b) Any additional SWMUs or 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 Permittee shall implement corrective actions beyond the Facility boundary where necessary to protect human health and the environment consistent with RCRA Section 22a-449(c)-104 incorporating 40 CFR 264.101(c), unless the Permittee demonstrates, to the satisfaction of the Commissioner, that despite the Permittee's best efforts, as determined by the Commissioner, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is 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 Permittee shall submit schedule(s)/scope(s) of work 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 (RSRs). Such schedule(s) and scope(s) of work shall include, at a minimum, a schedule for development and implementation of the following plans and/or reports:

- (a) Site Characterization and Investigation Work Plan. The permittee will prepare a work plan for additional site characterization and investigation activities in accordance with the schedule in Section III of this Permit. The plan will also include:
 - i) Conceptual Site Model. The permittee will prepare an updated conceptual site model incorporating any new information and data available.
 - ii) Constituents of Concern List. The Permittee will update the constituents of concern list to include but not be limited to the addition of Per- and polyfluoroalkyl substances (PFAS).

3. Completion of Investigation

Upon completion of investigation, the permittee shall submit a Completion of Investigation Report with a Commissioner approved transmittal form for the Commissioner's review and approval.

4. Remedial Action Plan ("RAP")

The Permittee shall prepare and submit for the Commissioner's review and written approval one or more RAP(s) and associated cost estimates, developed in accordance with this Permit and RCSA Sections 22a-449(c)-104(a)(1) and 22a-133k-1 et.seq. (RSRs), incorporating 40 CFR 265 Subpart G, 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 Permittee 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) A plan to ensure continued operation of the Sub-Slab Depressurization System (SSDS) currently installed in the area of the former 1,1,1 -TCA Satellite Accumulation Area (AOC12) until such time approval from the Commissioner is granted to cease operation.
- (viii) 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.
- (ix) Recording of an Environmental Land Use Restriction on the Town of Plainville Land Records if warranted, 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 RCSA Section 22a-133q-1.

The RAP and associated schedule 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.

5. Quality Assurance Project Plan

A Quality Assurance Project Plan (QAPP) was submitted in the permit application and the issuance of this permit constitutes its approval.

6. Ecological Risk Assessment

On August 15, 2017, the Permittee submitted a Screening Level Ecological Risk Assessment (SLERA) to the Commissioner. Based on the results of SLERA, the Permittee is required to conduct additional studies and activities to determine the potential for ecological receptors to be exposed to contaminants. The Permittee submitted for the Commissioner's review a Base Line Ecological Assessment (BERA) Work Plan dated May 29, 2019. The Commissioner provided comments on the Work plan to the Permittee on March 3, 2020. The permittee shall conduct the BERA in accordance with the BERA work plan and as necessary, further evaluate Site-related environmental risk or identify and implement appropriate remedial activities.

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

The Permittee shall notify the Commissioner in writing, within fifteen (15) calendar days of discovery, of any new suspected or confirmed AOCs, SMWUs or hazardous waste management units as discovered under Condition No. II.B.1.(b). 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).

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

- (a) The Permittee 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 Condition No. II.C.1.(b) 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.

9. Interim Measures (IM)

(a) Work Plan

- (i) Upon notification by the Commissioner, the Permittee 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 Condition No. II.B.9.(a)(i). Such interim measures may be conducted concurrently with investigations required by this permit.

- (ii) The Permittee 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. 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 in Condition No. II.B.9.(c).
- (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 Permittee shall implement the IM in accordance with the approved IM Work Plan.
- (ii) The Permittee shall give notice to the Commissioner within seven (7) calendar days of any planned changes, reductions or additions to the IM Work Plan imposed under Condition No. II.B.9.(a)(i) or initiated by the Permittee under Condition No. II.B.9.(a)(ii).

(c) IM Reports

- (i) If the time required for completion of interim measures is greater than one year, the Permittee 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) The Permittee shall prepare and submit to the Commissioner, within ninety (90) calendar days of completion of interim measures and receipt of validated analytical data conducted under Condition No. II.B.9. an IM

Report. 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.

10. Remedy Selection and Notification of Remedial Implementation

- (a) The Permittee 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 Permittee when selecting and approving a remedy for the Site or area affected by the Site or any portion thereof.

11. Public Participation Plan

The Permittee shall prepare and submit for the Commissioner's review and written approval a Public Participation Plan in accordance with Section III.B. Such plan shall include:

- (a) The development of a site mailing list that at a minimum includes: the Chief Elected Official, the Director of Health, the Fire Chief, and Planning and Zoning Department for the Town of Plainville; the State Representative(s) and Senator(s) that represent the Town of Plainville; and the property owners identified in Condition No. II.B.11.(b) and (c).
- (b) A provision for notifying the owners and/or occupants of the properties identified below at least thirty (30) calendar days prior to the start or completion of

remediation work or when there is a significant change in the environmental conditions of the site or area(s) affected by the site. The list of affected properties is included in Appendix II-1 of this Permit.

- (c) A provision for notifying the owners and/or occupants of any additional properties identified by the US EPA or the Department to be within the area in which the ground waters can reasonably be expected to become polluted as the result of any pollution emanating from the site; and
- (d) A proposal for the provision of annual written updates via a letter or newsletter or any other means to the site mailing list regarding the status of corrective action at the site and areas affected by the site.
- (e) A public notice prior to the start of or completion of remedial activities or the completion of post-closure care inclusive of surface and groundwater monitoring at the Site or area affected by the Site or any portion thereof consistent with the requirements of CGS Section 22a-134(i);
- (f) The submittal of a copy of such notice to the Commissioner ten (10) calendar days prior to the date of the publication; and
- (g) The submittal of a written summary of all comments received and responses thirty (30) calendar days after the end of the comment period.

The Permittee shall submit a revised plan sixty (60) calendar days prior to any installment of any future remedial system of treatment and control, or any significant change in site conditions.

The Commissioner shall review the summary of the comments and the Permittee's responses and shall either: adopt the responses, adopt the responses with modifications, or reject the responses and prepare a response to each comment.

In the event of substantial changes in the remedial or post-closure care approach, the Commissioner may require an additional opportunity for public comment with respect to such changes.

12. Public Notice Requirements

The Permittee shall provide public notice of any proposed remediation and the Commissioner's tentative determination that remediation and/or post-closure care inclusive of surface and groundwater monitoring is complete. Each public notice must provide a forty-five (45) calendar day comment period and a public information meeting 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 Permittee 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 post-closure care inclusive of surface and groundwater monitoring is complete, the Permittee 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 post-closure care and/or remediation is complete then the Stewardship Permit will be terminated and a Certificate of Completion will be issued.
13. Implementation of Remedial Activities
The Permittee 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
14. Completion of Active Remediation
- (a) The Permittee 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 Permittee shall submit to the Commissioner via registered mail, a certification

signed by the Permittee and by Licensed Environmental Professional 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 of the remedial actions shall be submitted in the form of a Remedial Action Report and submitted within 90 days after the completion of the active remediation

15. Miscellaneous

- (a) Future Corrective Action. If the Commissioner determines that the surface and groundwater monitoring data indicates the soil and/or groundwater remediation was not effective, the Permittee shall within one hundred eighty (180) days of the Commissioner's notice, submit for the Commissioner's review and written approval, a plan for additional soil and groundwater characterization and establishment of a corrective action program consistent with the objectives of 40 CFR 264.100.
- (b) For any substances reported at or emanating from the Site, for which no remediation criteria has been adopted, the Permittee shall, in accordance with the Remediation Standard Regulations, submit for the Commissioner's review and written approval a proposal for additional remediation.
- (c) The Permittee 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, authorized closure and/or corrective action activities. Such waste shall be managed in accordance with all applicable regulations. The Permittee 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 Permittee has submitted a detailed written estimate(s) of the current cost to perform investigation and remediation of the Site or areas affected by the Site inclusive of post-closure care of any land disposal units in accordance with the requirements of this permit.

In accordance with the Schedule described in Section III.B. of this Permit, Permittee shall submit for the Commissioner's review and written approval a detailed written estimate(s) of the current cost to perform the next phase of investigation and remediation of the Site or areas affected by the Site inclusive of post-closure care of any land disposal units, as set forth on the Schedule, in accordance with the requirements of this permit ("Revised Cost Estimate"). The Permittee 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 that a ten percent (10%) contingency shall be applied to the estimates for unforeseeable elements or events which may increase the cost of performing corrective action.

2. Establishment of Financial Assurance

The Permittee shall establish and continually maintain financial assurance at least in the amount of the Revised Cost Estimate using one or more of the financial assurance mechanisms and instrument formats approved or prescribed by the Commissioner for investigation and remediation of the Site or areas affected by the Site. Before development of the Revised Cost Estimate, the Permittee shall establish and continually maintain financial assurance at least in the amount of \$104,000. Such financial assurance mechanisms and instruments shall be consistent with 40 CFR 264 Subpart H, as modified by R.C.S.A. § 22a-449(c)-110 *et seq.*

Such assurance above the initial \$104,000 may be established incrementally, such that 10% of the remaining cost of performing corrective action is initially established and an additional 10% is established annually (e.g. the 2nd year 20%, the 3rd year 30% is established etc...) thereafter such that a total of 100% of the financial assurance is established prior to the expiration of this Permit.

3. Inflationary Adjustments

The Permittee 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, within 60 days prior to the anniversary date of the establishment of the mechanism(s) for financial assurance until the Commissioner releases the Permittee 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 thirty (30) calendar days of preparation.

4. Periodic Reductions

Upon request by the Permittee, 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 ten percent (10%) reduction in the estimate costs.

5. Maintenance of Financial Assurance
The Permittee shall maintain such financial assurances in effect until the Commissioner notifies the Permittee in writing that it is no longer required to maintain such a mechanism for financial assurances as provided for in Condition No II.C.2 of this Permit.

6. Failure to Perform
If the Permittee fails 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 Permittee, in writing, of the alleged failure to perform and provide Permittee with a reasonable period of not less than fifteen (15) calendar days in which to remedy the alleged non-performance.

Plainville Plating Company
21 Forestville Avenue
Plainville, CT

Permit No. DEEP/REM/SP/2021-5998
EPA ID No. CTD001149459

SECTION III
STEWARDSHIP PERMIT
COMPLIANCE SCHEDULE

PLAINVILLE PLATING COMPANY
21 FORESTVILLE AVENUE, PLAINVILLE, CT

EPA ID No. CTD001149459
Permit No. DEEP/REM/SP/2021-.

SECTION III COMPLIANCE SCHEDULE

- A. All conditions set forth in Section III.A. of this Permit shall be conducted within thirty (30) calendar days of the effective date of this Permit. Otherwise, the Permittee may be subject to formal enforcement actions.
1. **Retention of Consultant(s) or LEP(s).**
The Permittee shall designate and assign a LEP(s), acceptable to the Commissioner to prepare the documents required by this permit and shall, by that date, notify the Commissioner in writing of the identity of such LEP(s). The Permittee shall assign such LEP(s), acceptable to the Commissioner, until this Permit is fully complied with. The Permittee shall notify the Commissioner in writing of the identity of any LEP(s) other than the one 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 Permittee 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.
 2. **Liability Coverage**
The Permittee shall submit for the Commissioner's review the liability coverage required pursuant to this Permit.
- B. All conditions set forth in Section III.B. of this Permit, shall be conducted within one hundred twenty (120) calendar days of the effective date of this Permit. Otherwise, the Permittee may be subject to formal enforcement actions.
1. **Submittal of Schedule.** The Permittee shall submit for the Commissioner's review and written approval a schedule ("Schedule") for the submission of:
 - a) **Revised Post-Closure Plan.** A Post-Closure Plan and associated cost estimate prepared in accordance with the requirements of Condition No. II.A.1 of this Permit.
 - b) **Scope of Work.** A Scope of Work shall be prepared in accordance with the requirements of Condition No. II.B.2. of this Permit.
 - c) **Completion of Investigation.** A Completion of Investigation Report shall be prepared in accordance with the requirements of Condition II.B.3 of this Permit.
 - d) **Remedial Action Plan.** A Remedial Action Plan shall be prepared in accordance with the requirements of Condition No. II.B.4 of this Permit.
 - e) **Ecological Risk Assessment.** A final BERA shall be prepared in accordance with the requirements of Condition No. II.B.6 of this Permit.
 - f) **Public Participation Plan.** A Public Participation Plan prepared in accordance with the requirements of Condition No. II.B.11 of this Permit.
 - g) **Remedial Action Report.** A final Remedial Action Report shall be prepared in accordance with the requirements of Condition No. II.B.15 of this Permit.
 2. **Revision of Cost Estimate.** The Schedule shall also specify milestones at which point the Revised Cost Estimate shall be further revised and the financial assurance amount shall be further adjusted.

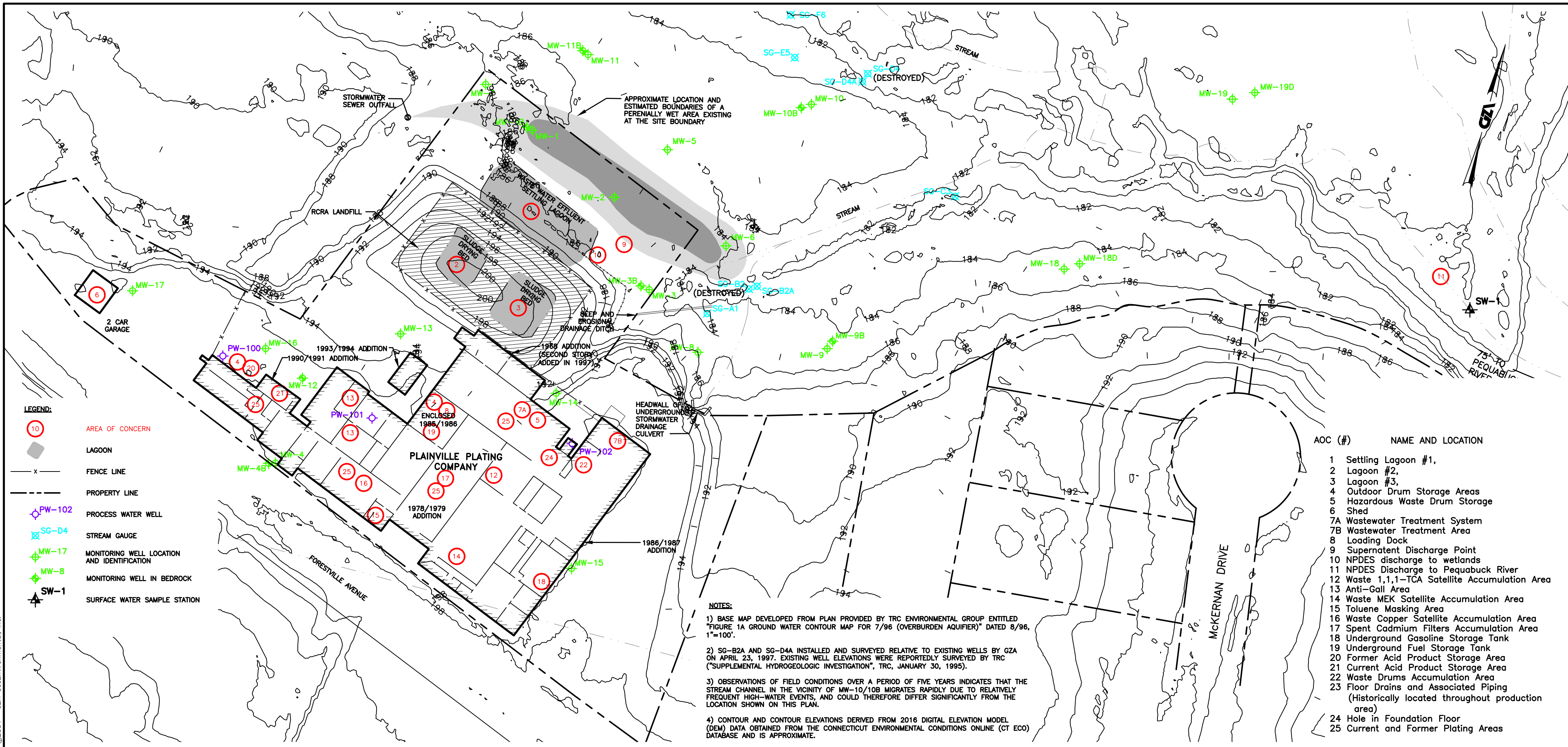
- C. All conditions set forth in Section III.C. of this Permit, shall be conducted within three hundred sixty five (365) calendar days of the effective date of this Permit. Otherwise, the Permittee may be subject to formal enforcement actions.
1. Progress Reports. The Permittee shall submit a progress report for the Commissioner's review describing the actions which the Permittee has taken to date to comply with the terms and conditions of this Permit and annually thereafter until all actions required by this Permit have been completed to the Commissioner's satisfaction.
- D. All conditions set forth in Section III.D. of this Permit, shall be conducted within the timeframe specified. Otherwise, the Permittee may be subject to formal enforcement actions.
1. Financial Assurance. Within one hundred fifty (150) calendar days of the effective date of this Permit, the Permittee shall establish and continually maintain financial assurance at least in the amount identified in Condition No. II.C.2. of this Permit, using one or more financial assurance mechanisms prescribed by the Commissioner for post-closure care inclusive of surface and groundwater monitoring at the Site or areas affected by the Site.
 2. Retention of Additional or Replacement Consultant(s) or LEP(s). The Permittee shall notify the Commissioner in writing within ten (10) calendar days of retaining any additional or replacement consultant(s) or LEP(s) other than those approved in writing by the Commissioner pursuant to Condition No. I.E.23. of this Permit. Such notification shall include a description of the consultant's or LEP's education, experience and training which is relevant to the work required by this Permit.

Any consultant(s) or LEP(s) retained to perform all investigation and remediation activities in response to this Permit, must be an independent, licensed environmental professional, and must provide professional services in accordance with RCSA Section 22a-133v-1 through 8 (the Licensed Environmental Professional Regulations). Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable consultant or LEP unacceptable.

Plainville Plating Company
21 Forestville Avenue
Plainville, CT

Permit No. DEEP/REM/SP/2021-5998
EPA ID No. CTD001149459

Figure I-1
Plainville Plating Company
Site Layout Map and AOCs



- LEGEND:**
- 10 AREA OF CONCERN
 - LAGOON
 - x- FENCE LINE
 - - - PROPERTY LINE
 - PW-102 PROCESS WATER WELL
 - SG-D4 STREAM GAUGE
 - MW-17 MONITORING WELL LOCATION AND IDENTIFICATION
 - MW-8 MONITORING WELL IN BEDROCK
 - SW-1 SURFACE WATER SAMPLE STATION

- | AOC (#) | NAME AND LOCATION |
|---------|--|
| 1 | Settling Lagoon #1, |
| 2 | Lagoon #2, |
| 3 | Lagoon #3, |
| 4 | Outdoor Drum Storage Areas |
| 5 | Hazardous Waste Drum Storage |
| 6 | Shed |
| 7A | Wastewater Treatment System |
| 7B | Wastewater Treatment Area |
| 8 | Loading Dock |
| 9 | Supernatant Discharge Point |
| 10 | NPDES discharge to wetlands |
| 11 | NPDES Discharge to Pequabuck River |
| 12 | Waste 1,1,1-TCA Satellite Accumulation Area |
| 13 | Anti-Gall Area |
| 14 | Waste MEK Satellite Accumulation Area |
| 15 | Toluene Masking Area |
| 16 | Waste Copper Satellite Accumulation Area |
| 17 | Spent Cadmium Filters Accumulation Area |
| 18 | Underground Gasoline Storage Tank |
| 19 | Underground Fuel Storage Tank |
| 20 | Former Acid Product Storage Area |
| 21 | Current Acid Product Storage Area |
| 22 | Waste Drums Accumulation Area |
| 23 | Floor Drains and Associated Piping (Historically located throughout production area) |
| 24 | Hole in Foundation Floor |
| 25 | Current and Former Plating Areas |

NOTES:

1) BASE MAP DEVELOPED FROM PLAN PROVIDED BY TRC ENVIRONMENTAL GROUP ENTITLED "FIGURE 1A GROUND WATER CONTOUR MAP FOR 7/96 (OVERBURDEN AQUIFER)" DATED 8/96, 1"=100'.

2) SG-B2A AND SG-D4A INSTALLED AND SURVEYED RELATIVE TO EXISTING WELLS BY GZA ON APRIL 23, 1997. EXISTING WELL ELEVATIONS WERE REPORTEDLY SURVEYED BY TRC ("SUPPLEMENTAL HYDROGEOLOGIC INVESTIGATION", TRC, JANUARY 30, 1995).

3) OBSERVATIONS OF FIELD CONDITIONS OVER A PERIOD OF FIVE YEARS INDICATES THAT THE STREAM CHANNEL IN THE VICINITY OF MW-10/10B MIGRATES RAPIDLY DUE TO RELATIVELY FREQUENT HIGH-WATER EVENTS, AND COULD THEREFORE DIFFER SIGNIFICANTLY FROM THE LOCATION SHOWN ON THIS PLAN.

4) CONTOUR AND CONTOUR ELEVATIONS DERIVED FROM 2016 DIGITAL ELEVATION MODEL (DEM) DATA OBTAINED FROM THE CONNECTICUT ENVIRONMENTAL CONDITIONS ONLINE (CT ECO) DATABASE AND IS APPROXIMATE.

REV. NO.	DESCRIPTION	BY	DATE	
	Project Mgr: CJF Designed By: ABT Reviewed By: TFS		Drawn By: MJS Date: 9/14/04	
PLAINVILLE PLATING COMPANY, INC. PLAINVILLE, CONNECTICUT		SITE PLAN		
JOB NO.		43402.14		
SHEET NO.		2		
GeoEnvironmental, Inc. 120 Mountain Avenue Bloomfield, Connecticut 06002 Phone (860)286-8900 Fax (860)242-8389				

Plainville Plating Company
21 Forestville Avenue
Plainville, CT

Permit No. DEEP/REM/SP/2021-5998
EPA ID No. CTD001149459

Table II-1
Plainville Plating Company
Areas of Concern

**Attachment J - Table 1
Status Summary of Areas of Concern
Plainville Plating
21 Forestville Avenue
Plainville, Connecticut**

AOB	NAME AND LOCATION	SUMMARY	STATUS	RECOMMENDATIONS
1	Settling Lagoon #1, located north of Lagoon #2 and Lagoon #3, north of (behind) the facility building	Surface impoundment formerly used to settle out metal hydroxide precipitate from the treated wastewater. The impoundment was closed by excavating precipitate sludge and impacted soils from its base and testing remaining soils. Metals detected at concentrations below approved media closure criteria.	PPCI ceased operations of the lagoons in May 1986. The units were cleaned and closed as a landfill 1988 to 1989. A Certification of Clean Closure was signed on November 15, 1989. CTDEEP and EPA issued a Determination of the clean closure by joint letter dated June 26, 1990.	No further action required. Continued post-closure care and groundwater monitoring under the revised Post-closure care plan.
2	Former Sludge Drying Bed, Lagoon # 2 located north of (behind) the facility building	Surface impoundment formerly used for solids drying. Sludge soils from Lagoon #1 were relocated over this lagoon. This lagoon was covered with a low permeable cap as a landfill.		
3	Former Sludge Drying Bed Lagoon #3 north of (behind) the facility building	Surface impoundment formerly used for chemical batch bath treatment dumping and drying. Sludge and soils from Lagoon #1 were relocated over this lagoon. This lagoon was capped and closed as a landfill.		
4	Outdoor Drum Storage Areas, located at current location of main plating area and by AOC-20	Area used until 1985. The area by the main plating area is now enclosed by the building. A sub-floor venting system was installed in 2011. For area by AOC-20, see below under AOC-20.	Area is inaccessible. Impacts will be evaluated through GW at MW-13. RCRA EI CA 725 (i.e., Current Human Exposures Under Control) achieved in September 2003 and CA 750 (i.e., Migration of Contaminated Groundwater Under Control) achieved in September 2004.	Within building footprint. Presumed remedy is placement of an ELUR. Additional monitoring of groundwater downgradient of site COCs. No additional soil investigations proposed.
5	Hazardous Waste Drum Storage Area, located adjacent to Wastewater Treatment System in basement	Area where approximately 20 containers of spent plating solution (cyanide and other miscellaneous waste) were observed during a 1985 CTDEEP inspection. Area in use from 1985 to 1986.	Waste drums were removed in June 1986 and concrete floor and anodizing tanks were installed in area. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
6	Shed, located on the western boundary of the property	Previously used to store waste 1,1,1-TCA and other Site wastes. Investigations of soil and groundwater found no evidence of a release. Area in use until 1985. Shed is now used for equipment storage.	1997 - 11 borings w/in and surrounding the 20'x20' shed at 3 1-ft depth increments. Low level TPH ascribed to asphalt. Total metals within range of background. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Additional shallow soil sampling for selected Site COCs. Additional groundwater monitoring at downgradient well MW-17.
7A	Wastewater Treatment System, located in basement adjacent to anodizing tanks	Area in use from 1969 to present. System originally consisted of a Lacey Integrated System. Various upgrades were made in 1986 (flocculation and clarifying).	Area in basement where previous sub-floor GW sampling was conducted. Groundwater seasonally rises to elevation of floor slab. Water level controlled by subfloor sump. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Within building footprint. Presumed remedy is placement of an ELUR. Additional shallow soil sampling are recommended where access is viable. Samples to be analyzed for Site Constituents of Concern. VOC below floor slab have been addressed through installation of sub-slab venting system. Additional groundwater monitoring at downgradient wells.
7B	Wastewater Treatment Area, located adjacent to Drum Accumulation Area	System includes a neutralization and clarifying tanks. Area in use from 1985 to present.	Area is inaccessible. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
8	Loading Dock, west of Main Plating Area is currently	Area in use prior to 1978 and is now enclosed by building. Area has wooden floor. A sub-floor venting system was installed in 2011.	Soil vapor sampling in 2006 found TCE and TCA > I/C-SVCC. Subfloor venting system was installed in October 2011. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
9	Supernatant Discharge Point from Settling Lagoon to wetlands behind facility	Supernatant was discharged from the settling lagoon to the wetlands. Area in use from 1968 to 1986.	16 shallow borings completed in a 15' by 15' area of the former lagoon outfall to 4 feet of depth. Average COC concentrations reported < R-DECS. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Additional shallow soil sampling for selected Site COCs to evaluate PMCs. Additional groundwater monitoring at downgradient wells.
10	Former NPDES discharge to tributary stream east of facility building	Analytical results of surface water and sediments downgradient of effluent discharge demonstrated human exposures are controlled. Area in use from 1986 to 1990.	No known release noted. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	COCs in sediments are below R-DEC. Additional evaluation of impacts to aquatic ecological receptors proposed through the BERA program.
11	NPDES discharge to Pequabuck River	Treatment effluent had been discharged via an underground pipe to the Pequabuck River 740-feet east of the building. Discharge was within compliance with the permit and human exposures have been controlled. Area in use from 1991 to 2002.	No known release noted.	COCs within surface water were within NPDES permit limits. Additional evaluation of impacts from sediments to aquatic ecological receptors proposed through the BERA program.
12A	Waste 1,1,1-TCA Satellite Accumulation Area, located in racking area adjacent to virgin 1,1,1-TCA Tank	1,1,1-TCA satellite accumulation area was contained within a square metal bin. Indoor air sampling showed no detection and human exposures have been controlled. Area in use from 1978 to 1993.	Sub-slab soil vapor sampling showed trichloroethene is present above the R-SVVC and the I/C-SVVC. A sub-slab soil venting system was installed in 2011. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Presumed remedy is the placement of an ELUR. Additional shallow soil sampling for selected Site Constituents of Concern. Additional groundwater monitoring at downgradient wells.
12B	Virgin, 1,1,1-TCA tank and Degreaser, in same containment located in racking area	Indoor air sampling showed no detections and human exposures have been controlled. Area used prior to 1993.		
13	Anti-Gall Area, located near strip area	Air dry film lubricant is applied as a spray paint. Xylene is used to clean the spray gun. Human exposures area controlled. Area is currently still in use.	Area evaluated remotely through groundwater monitoring at MW-13.	Presumed remedy is the placement of an ELUR. Additional shallow soil sampling for selected Site Constituents of Concern. Additional groundwater monitoring at selected downgradient wells.

Attachment J - Table 1
Status Summary of Areas of Concern
Plainville Plating
21 Forestville Avenue
Plainville, Connecticut

AOB	NAME AND LOCATION	SUMMARY	STATUS	RECOMMENDATIONS
14	Waste MEK Satellite Accumulation Area, located in masking area near office	Waste MEK is collected in a satellite 55-gallon drum. A steel secondary containment structure was added. Area has been in use from 1987 to present.	A satellite storage area was kept in this area on concrete floor within a steel secondary containment structure. Area is now flammable liquids locked with secondary containment in same area. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Presumed remedy is placement of an ELUR. Additional shallow soil sampling for selected COCs where access is allowed. Additional groundwater monitoring in downgradient wells for selected Site COCs
15	Former Toluene Masking Area	Area was located at what is now the Production Manager's Office. Toluene thinner used for masking was stored in 25-gallon AST. Area was in use until circa 1992.	Area no longer used. Tank now located within Spray Booth in Anti-Gall area at AOC 13. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
16	Waste Copper Satellite Accumulation Area	Area is reportedly used only a few times per year to store solid copper residue collected from copper tanks within containers. Area has been in use from 1987 to present.	No releases have been reported in this area. Potential impacts from releases is presumed low as residues are solid. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
17	Spent Cadmium Filters Satellite Accumulation Area	Area contained five spent cadmium filters stored within containers. Area used between 1987 to 1994.	No known release noted. Potential impacts from releases is presumed low as residues in filters were solid and spent filters were stored in containers. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Within building footprint. Presumed remedy is placement of an ELUR. Area is inaccessible due to raised floors with secondary containment system in-place. Indirect assessment through groundwater monitoring.
18	Underground Gasoline Storage Tank, located on the western side of the building	Former 300-gallon UST and piping were removed in 1895. No soil samples were collected. Groundwater analysis in downgradient wells did not detect aromatic hydrocarbons. Former tank location is now underneath office area of building.	No known release noted. Area impacts assessed indirectly through sampling groundwater at wells MW-3, MW-3B, MW-8 and MW-15.	Presumed remedy is the placement of an ELUR. Additional indirect assessment through groundwater sampling at downgradient wells.
19	Underground Fuel Storage Tank, located near the boiler rooms	Former 5,000-gallon UST was abandoned in-place. No soil samples were collected. Groundwater analysis did not detect aromatic hydrocarbons. Former tank is underneath a building and was used prior to 1986.	Subfloor venting system was installed in October 2011. Impacts evaluated through GW at MW-14.	
20	Former Acid Product Storage Area, located outdoors behind western part of facility	Virgin acids were stored outdoors on concrete pad until 1991. Area was in now covered with new concrete pad and enclosed within the building when current Acid Product Storage Area was constructed in 1991.	No known release noted. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Additional shallow soil sampling downgradient of area for selected Site COCs where access is available. Additional indirect assessment through groundwater sampling at downgradient wells.
21	Current Acid Product Storage Area, located indoors near shipping and receiving and adjacent to the clarifier tank	Virgin acids stored within building on a sealed concrete pad with containment. Groundwater sampling does not indicate the presence of acids. Area used from 1991, when constructed, to present.	No known release noted. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	Within building footprint. Presumed remedy is placement of an ELUR. Three shallow soil samples are recommended where access is allowed. Samples to be analyzed for Site Constituents of Concern. Additional indirect assessment through groundwater sampling at downgradient wells.
22	Waste Drum Accumulation Area, located indoors near shipping and receiving and adjacent to the clarifier tank	Area used to store F006 and other wastes collected at the satellite areas and spent plating baths. Drums stored within sealed concrete containment area with lined trench which discharges to wastewater treatment system.	Area is inaccessible. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
23	Floor Drains and Associated Piping, located throughout the facility	Historic inspections reported discharges to the lagoons (AOC-2 & 3) and to the wastewater treatment system, then to the lagoon. All floor drains now discharge to the spill tank in the waste water treatment system (AOC 7A).	Area is inaccessible. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
24	Hole In Foundation Floor, near anodizing line	Soil remediation occurred until remaining soils via Ep Toxicity Leachate Testing were determined non-hazardous. Hole was then filled with concrete.	Area is inaccessible. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	This includes the sampling of monitoring wells MW-1, MW-1B, MW-2, MW-3, MW-3B, MW-7, MW-8, MW12, MW-13, MW-14, MW-16 for Site Constituents of Concern.
25	Current and Former Plating Areas	Portions of former plating area was over dirt floor in basement. Upgrades were made to area in 1989 through construction of sealed concrete floor and sealed concrete collection trenching draining to wastewater treatment system.	Area is located above raised floor with secondary containment system below. Inaccessible to direct investigations. Area assessed indirectly through groundwater monitoring at downgradient wells. RCRA EI CA 725 achieved in September 2003 and CA 750 achieved in September 2004.	
	Downgradient Groundwater Monitoring	Source of Site Constituents of Concern from interior AOCs in groundwater.	Groundwater will be used to investigate AOCs that have restricted access for soil investigations. RCRA EI CA 750 achieved in September 2004.	