

HRP Associates, Inc.

Creating the Right Solutions Together

June 12, 2007

Ms. Melanie Morash
On-Scene Coordinator
U.S. Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

**RE: ADDENDUM, CONCEPTUAL APPROACH TO REMOVAL ACTION,
WAMPUS MILFORD ASSOCIATES SITE, MILFORD, CONNECTICUT
(HRP #FRA-0348.RA)**

Dear Ms. Morash:

Thank you for your assistance in working with FCI USA, Inc. (FCI) and HRP Associates, Inc. (HRP) in our effort to better define and understand the scope of work necessary to address the EPA's goals for the proposed Removal Action, currently being designed to address the contaminated swale sediment and immediately adjacent soil located on Lot 2 of the Wampus Milford Associates site in Milford, Connecticut. Following our most recent teleconference with you and Dave Ringquist and Gene Shytenberg of CT DEP on June 7, 2007, it is our belief that the goals, applicable clean-up standards, and general approach to the removal action have been reasonably defined. The purpose of this letter is to document the set of plans and correspondence that describe the accepted conceptual approach to the proposed removal action, and to address the final issues we discussed during the June 7, 2007 teleconference.

Documents describing the general approach and scope of the proposed removal action are listed below.

1. Conceptual Approach to Removal Action, HRP, May 2, 2007.
2. Conceptual Approach to Removal Action (Comments), U.S. Environmental Protection Agency, May 10, 2007.
3. Response to EPA Comments, HRP, May 25, 2007.

Based upon on discussions with you and CT DEP on June 7, 2007, it is our understanding that the Response to EPA Comments (HRP, May 25, 2007) satisfactorily addressed all of your prior comments, except for those that are addressed with the plan modifications described below:

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1. The profile of the excavation will be modified as shown on the attached Figure 1, which replaces the schematic profile provided with HRP's May 25, 2007 submittal. Beneath the water bearing channel within the swale drainage, contaminated soil will be excavated to a depth of 4 feet beneath the bottom of the channel. The width of the 4-foot excavation will include the channel, as well as an additional 1-foot on either side of the channel for a minimum width of 4-feet. In addition, immediately adjacent soil (on either side of the 4-foot deep excavation) that exceeds applicable I/C DEC will also be excavated to a depth of 2 feet below grade (as opposed to 6 inches, as previously proposed).
2. In cross section, seven post-excavation confirmatory soil samples will be collected for laboratory analysis from each line of profile as shown on Figure 1. The samples will be tested for the Constituents-of-Concern discussed in the Conceptual Approach to Removal Action (HRP, May 2, 2007) and the Response to EPA Comments (HRP, May 25, 2007). The longitudinal spacing between each cross-sectional line of profile will be 20 feet, measured along the axis of the swale.
3. Analytical testing results of the post-excavation confirmatory soil samples will be used to determine possible additional soil excavation requirements, as well as the completeness of the removal action. The test results will be compared to the following action levels.
 - o Soil at depths less than 2 feet below grade will be compared to the applicable industrial commercial Direct Exposure Criteria (I/C DEC). Excavation of contaminated soils to a depth of 2 feet below grade will continue laterally until sidewall test results demonstrate compliance with this standard. If for any reason material is not removed to a depth of 2 feet, bottom samples will be compared to the I/C DEC to confirm compliance.
 - o Soil at depths between 2 and 4 feet below grade will be compared to ½ of the applicable Significant Environmental Hazard Notification Thresholds (the same as 15x the I/C DEC). Contaminated soils exceeding this threshold will be excavated to a maximum depth of 4 feet below grade.
 - o Contaminated soil at depths of 4 feet and greater, which exceed the I/C DEC will be considered inaccessible and will not be excavated as part of the removal action.
4. If necessary, the current and/or future property owners and/or other Connecticut Transfer Act Certifying Parties can work with CT DEP in the future to address any residual soil impacts following the removal action that exceed RSR soil criteria and/or which require an environmental land use restriction (ELUR) to bring the site into compliance with the CT Remediation Standard Regulation.

Ms. Melanie Morash
Page 3
June 12, 2007

We believe this response sufficiently addresses the items that you requested in the June 7, 2007 teleconference. In an effort to reach final clarification regarding the scope and objectives of the removal action, such that FCI can present the proposed plan to ownership and management in France in conjunction with the proposed Administrative Order On Consent (AOC), we respectfully request written correspondence documenting your concurrence with the general approach and objectives of the removal action as they are presented (with modifications) in this letter and the prior correspondence referenced above.

We understand that the details regarding the implementation methodologies which will be utilized to meet the objectives of the approved Conceptual Approach will need to be documented in a future Scope of Work, which will also be submitted to your office for review and approval.

In the interim, if you have any questions or require additional information, or would like to discuss these items directly with HRP, please feel free to contact Andy White at (860) 674-9570. We look forward to continuing to work with you on this project.

Sincerely

HRP ASSOCIATES, INC.



Brian P. Washburn, P.E., LEP
Senior Project Manager



by L. Andrew White, LEP
Associate Vice President

cc: Scott Durnin, FCI
Jill Steps, FCI
Douglas Cohen, Brown, Rudnick

Attachments

A

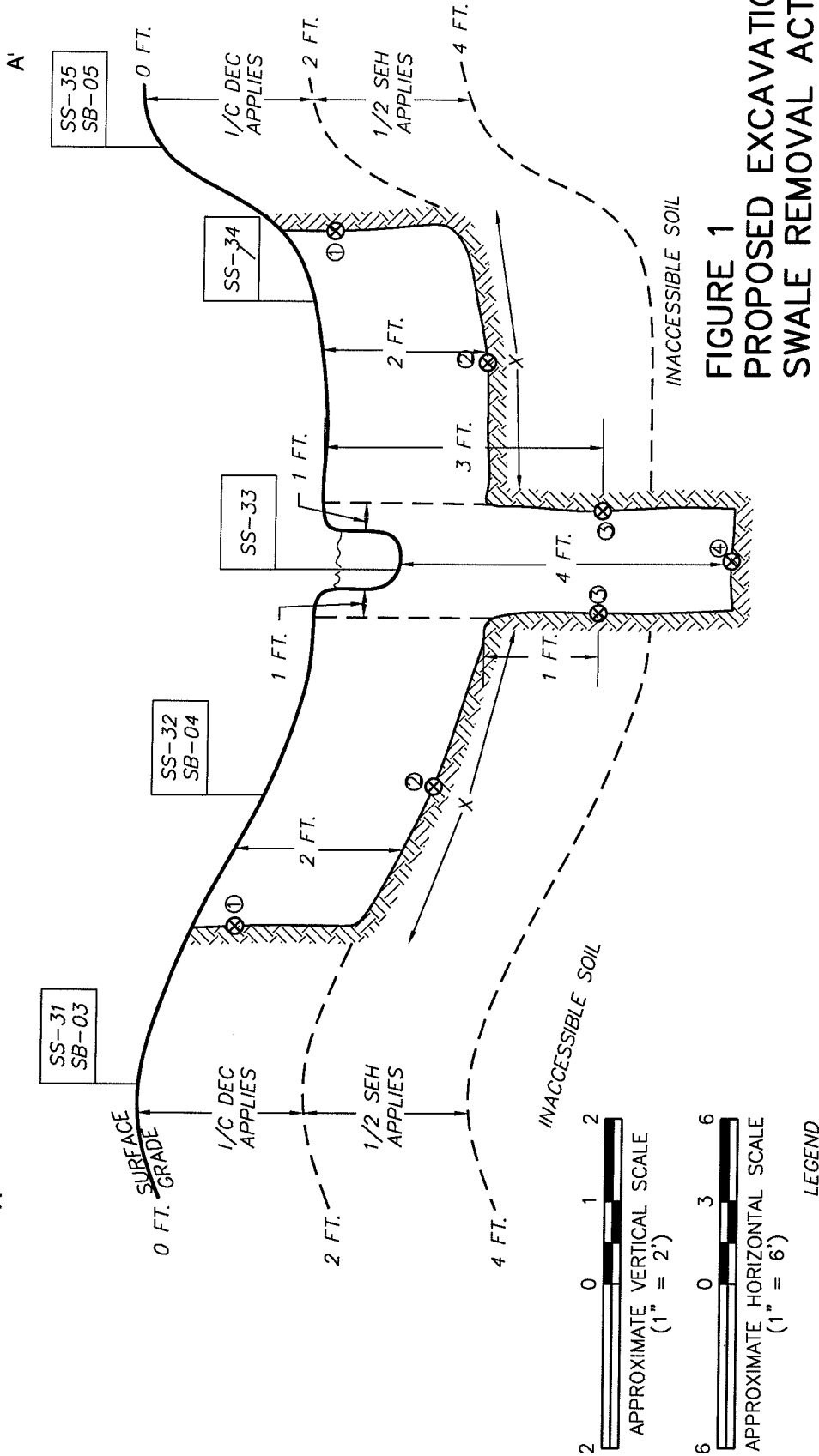


FIGURE 1
PROPOSED EXCAVATION PROFILE,
SWALE REMOVAL ACTION
WMA SITE
MILFORD, CT
HRP# FRA0348.RA
VERTICAL SCALE: 1" = 2'
HORIZONTAL SCALE: 1" = 6'

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- LEGEND**
- PROPOSED EXCAVATION LIMITS
 - ⊗ PROPOSED POST EXCAVATION CONFIRMATION SAMPLE LOCATION
 - ① 0-6" SIDEWALL SCRAPER
 - ② DISCRETE BOTTOM SAMPLE, COLLECTED AT APPROXIMATE MIDPOINT OF LATERAL EXCAVATION BOTTOM (1/2 X)
 - ③ DISCRETE SIDEWALL AT INDICATED DEPTH
 - ④ DISCRETE BOTTOM SAMPLE
 - SS-31 EXISTING WESTON SAMPLING LOCATION
 - 1/2 DEC INDUSTRIAL COMMERCIAL DIRECT EXPOSURE CRITERIA (APPLIES TO CONTAMINANTS THAT ARE SHALLOWER THAN 2 FT. BELOW SURFACE GRADE)
 - 1/2 SEH 1/2 X SIGNIFICANT ENVIRONMENTAL HAZARD REPORTING THRESHOLD (APPLIES TO CONTAMINANTS FROM 2 FT. BELOW GRADE TO 4 FT. BELOW GRADE)