



February 10, 2010

Kentucky Department for Environmental Protection  
Division of Waste Management  
Louisville Regional Office  
9116 Leesgate Road  
Louisville, KY 40222  
Attn: Mr. Keith Sims

**Nuplex Resins**

4730 Crittenden Drive  
Louisville, Kentucky 40209  
USA  
Telephone (502) 367 6111  
Facsimile (502) 375 5300  
[www.nuplexresins.com](http://www.nuplexresins.com)

**Subject: *Nuplex Resins, LLC Release - Post Incident Monitoring Plan***

Dear Mr. Sims:

On February 1, 2010, a release was discovered at the Nuplex Resins (Nuplex) plant located at 4730 Crittenden Drive, Louisville, Kentucky 40209. This release was a result of overfilling a process water tank which subsequently overflowed onto the floor of the process water building. A portion of the spilled process water eventually migrated to the Metropolitan Sewer Districts (MSD) sewer located along Wabasso Avenue.

To contain the spilled material and mitigate any further release, Nuplex Resins contracted Heritage Environmental Services (Heritage) to perform clean-up activities. Heritage's remedial activities to date are as follows:

- A trench was excavated along the process water building to mitigate any further infiltration of the released process water into the sewer. PVC pipe was placed into this trench as a source for future soil vapor extraction. The trench was then filled with rock.
- The area located directly adjacent to the process water building was excavated, and a 55 gallon drum with a sump pump was placed in this excavation to extract any remaining process water in the soil.
- After placing an air bladder into the pipe leading to the MSD sewer, the outfall crock was removed and the surrounding soil excavated. After this was accomplished, a sump pump was placed into a five gallon bucket which was then placed in the excavation. This was then covered with a 55 gallon drum and the excavation was partially filled with rock. This was done to further extract any remaining process water in the soil and to ensure that no material would enter the sewer via this pathway.
- The storm grate crock connected to the former outfall was pressure washed and all of the water and sludge material located in this crock was vacuumed out.

The following post incident activities will take place:

- Sump A, located by the Process Water Building and Sump B, located where the old Nuplex outfall was removed, will be visually inspected every hour including a check of the operability of the sump pumps. Water collected in the sumps will be pumped to a tank inside the Process Water Building which will be gauged every hour. Water from the tank will be disposed of by extracting the top interface from the tank and recycling this material back into our normal finished product stream. The water that remains will be profiled as process waste water and transported to our regular off-site treatment and disposal facility.
- Nuplex will be working with Schardein Mechanical and MSD to install the new outfall structure. New overhead storm water pipe will be installed to convey the site storm water to the new outfall and the approximate 40 feet of existing underground storm water piping will be abandoned in place. Once installation is complete, Nuplex will resume discharging site storm water to MSD via this new outfall.
- To ensure that no further process water enters the sewer, Nuplex will install a PID into the manhole located at the intersection of Wabasso Avenue and Louisville Avenue. Until this PID is installed, Nuplex will continue monitoring this manhole on a regular basis. The installed PID will be connected to a full time data logger and data will be downloaded and summarized each week. This PID will be connected to both a visual (strobe light) and an audible alarm which will be placed inside the plant so that it may be monitored by site personnel during scheduled working hours. In addition we will interface the PID to our 3<sup>rd</sup> party central station alarm monitoring service which is manned 24 hours per day and seven days per week. In the event that the PID reaches a preset agreed upon elevated reading, the alarms will sound, and a Nuplex Management Representative will be alerted. Predetermined containment and mitigation activities will be immediately implemented, and the proper regulatory agencies will be notified. The PID will remain in place until the KDEP agrees it is no longer necessary after which it will be relocated to the Nuplex outfall and monitoring as described above will continue on an ongoing basis.
- Nuplex will have Microbac Laboratories continue to sample the manhole at the intersection of Wabasso Avenue and Louisville Avenue once daily through February 15, 2010 and then once weekly through the end of February 2010.

Nuplex is committed to determining the vertical and horizontal extent of the release. To achieve this, soil borings will be performed around the process water building and samples will be collected and analyzed for volatile organic compounds (VOCs). A full plan for site characterization will be proposed to the state agency tasked with oversight for this facility.

Once the vertical and horizontal extent of the release is determined, Nuplex will perform remedial activities approved by the KDEP. Nuplex is committed to this clean-up and will work closely with the appropriate state agency.

Nuplex would like to thank the KDEP and US EPA for their assistance in mitigating the effects of this release.

Sincerely,

Nuplex Resins LLC

  
John Harris  
Plant Manager

  
Mike Wright  
Manager, IT, ISO Systems, and  
Regulatory Affairs

cc. Art Smith, US EPA  
Bradley Dillon, Greenebaum Doll & McDonald PLLC