

**Pharmacia & Upjohn Company, LLC
FACT SHEET
STEWARDSHIP PERMIT**

I. Name and Address of Applicant:

Pharmacia & Upjohn Company, LLC
41 Stiles Lane
North Haven, CT 06473
EPA ID No. CTD001168533

II. Facility Type:

Pharmacia & Upjohn Company, LLC, (the Permittee), was a facility that formerly treated, stored, or disposed of RCRA hazardous wastes, and applied for a Resource Conservation and Recovery Act (RCRA) Permit through the submittal of a RCRA Part A permit application. The Permittee submitted to the Connecticut Department of Energy and Environmental Protection (the Department) an Application for a Stewardship Permit, (Application # 202000231), on December 31, 2019, with supplemental attachments submitted on February 26, 2020.

III. Purpose of Permit:

The purpose of a Stewardship Permit is to require the Permittee to administer the long-term stewardship obligations including monitoring of environmental conditions, engineered controls, treatment systems, and institutional controls, as applicable. The Permit requires financial assurance and public participation in final remedy decisions and ensures that the site wide environmental remedy remains effective into the future.

IV. Statutory and Regulatory Basis of Permit:

The issuance and conditions of this Permit are based upon the Regulation of Connecticut State Agencies (RCSA) adopted pursuant to Connecticut General Statutes (CGS) Section 22a-449(c), and upon the provisions of CGS Sections 22a-6 and 22a-454 as applicable. The Connecticut Hazardous Waste Management Regulations incorporate by reference the federal RCRA hazardous waste regulations. These federal regulations include the technical and administrative standards for hazardous waste facilities as identified by Title 40 of the Code of Federal Regulations (CFR) Parts 264 and 270.

V. Description of Facility:

- The facility is located at 41 Stiles Lane in North Haven and consists of an approximately 78-acre parcel of land located within an area of mixed commercial/industrial use. The facility is bordered by an active rail line to the west, the Quinnipiac River to the east, State Route 40 to the north, tidal wetlands to the northeast, and active and inactive industrial sites to the south. Groundwater at the Site is classified GB.
- Historic operations/processes at the facility included a clay mine and brickyard from the mid-1800s until the mid-1930s, chemical manufacturing, including pharmaceutical, dye, pigment, and photographic intermediates, agricultural treatment chemicals, ultraviolet curing initiators, coating and adhesive additives, and flavor and fragrance components from mid-1940s to 1993, and electrical component manufacturing from 1963 to 1975.
- Wastes generated at the facility during historical operations primarily included chemical manufacturing process wastes, which included dichlorobenzenes, azobenzene, benzene, toluene,

PCBs, tetrachloroethylene, 3-3'-dichlorobenzene, and 2-chloroaniline, and wastewater treatment residuals (WWTR) containing VOCs, SVOCs, PCBs, and metals.

- The facility now consists of a single building which houses an active water treatment plant near the center of the property. A CT Rail station is proposed for a small area at the western edge of the property. The eastern portion of the property will remain undeveloped with walking trails and interpretive signage in place for future controlled public access. The western portion of the facility will possibly be developed in the future but there are no specific plans for that development at this time.

VI. Closure of the Hazardous Waste Management Units:

- Seven RCRA units were historically operated at the facility, including the North Pile, the Former Polishing Lagoon, the Former Enclosed Aeration Lagoon, the Former Drum Storage Area (designated Area of Environmental Concern-1 or AEC-1), and three storage tanks. Pharmacia & Upjohn submitted closure plans to the United States Environmental Protection Agency (USEPA) and the Department for each of these units and completed interim and/or final RCRA closure of the units. The Department, which was given final RCRA authorization by USEPA, stated that the site-wide corrective measure alternative presented in the final approved Corrective Measures Study Report, dated February 5, 2010, would provide the final RCRA closure for all RCRA units at the Site.
- The Department reviewed a final *RCRA Unit Closure Certification Report* dated August 6, 2019 and conducted a focused facility inspection on August 15, 2019. The Department, in concurrence with USEPA, acknowledged by letter on September 18, 2019, that all RCRA closure activities have been completed and provided notice that RCRA unit closure financial assurance and liability insurance obligations are released.

VII. Corrective Action and Long-Term Stewardship Obligations:

- RCRA Corrective Action requires the investigation and cleanup of all releases of contaminants at the facility to the environment.
- The Remediation Standard Regulations (RSCA Sections 22a-133k-1-3, inclusive) are the basis for determining that remediation is complete, with or without engineering and/or institutional controls. The use of any engineering controls and most institutional controls to complete the facility's cleanup requires a permit.
- The Permit compels the continuation of any post-remediation water or air monitoring, as well as the operations and maintenance of treatment systems.
- The Permit requires the establishment and maintenance of mechanisms assuring financial responsibility.

VIII. Available Materials:

Materials available for inspection with respect to this Permit include:

- A. The Permit Application;
- B. The Draft Stewardship Permit;
- C. The Notice of Tentative Determination for the Draft Stewardship Permit;
- D. Fact Sheet

These materials are available on the Pharmacia & Upjohn Company's webpage: <https://www.upjohnnorthhaven.com/>

Questions may be directed to the contact identified in the Notice of Tentative Determination.