

March 8, 2013

Mr. Richard Chandler
CCA, LLC
40 Old New Milford Road
Brookfield, CT 06804

RE: Exide Battery
Mill River, Fairfield, CT

Dear Mr. Chandler:

I am writing in response to the comment by Mr. Thomas Steinke, with respect to Page 22, 3.6 Federal Wetlands delineation. The soils abutting the Mill River in this area are largely disturbed and are classified as Urban Land, Udorthents-Urban Land Complex, Agawam-Urban Land Complex, or Urban Land-Charlton-Chatfield Complex. A small portion of project area in the southeast quadrant is classified as Woodbridge fine sandy loam. In Area 1, both sides of the Mill River are classified as Urban Land. Urban Land is a miscellaneous land type used to denote areas that are primarily buildings, pavement, driveways and landscaping. I have attached the Natural Resource Conservation Service digital soil map for the area.

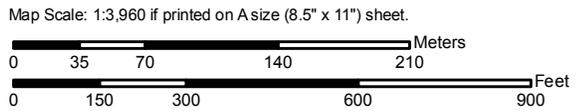
Mr. Steinke also questioned the lack of a Federal Wetland Delineation Transect for Area I. A transect is not required or necessary in Area I. The division of the project site into Areas I-IV was based on physical features such as road crossings. It did not correspond to different wetland plant community types or different landscape units. The Corps Wetland Delineation Manual and the NorthCentral/Northeast U.S. Regional Supplement provide guidance on location and number of transects that are required. Transects are to be located no more than 0.5 miles apart, and site to characterize the soils, vegetation, and hydrology in each wetland plant community present along the wetland boundary. The Wetland Delineation Manual also include a table which prescribes the number of transects required for linear projects of projects greater than 5 acres in size. Three transects are required at this site, with observation points in each plant community encountered. We met or exceeded those requirements.

Yours truly,



Michael S. Klein, Principal
Soil Scientist
Professional Wetland Scientist

Soil Map—State of Connecticut
(Mill River, Fairfield)



MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Units

Special Point Features

-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot
-  Spoil Area
-  Stony Spot

 Very Stony Spot

 Wet Spot

 Other

Special Line Features

-  Gully
-  Short Steep Slope
-  Other

Political Features

 Cities

Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

MAP INFORMATION

Map Scale: 1:3,960 if printed on A size (8.5" × 11") sheet.

The soil surveys that comprise your AOI were mapped at 1:12,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>

Coordinate System: UTM Zone 18N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: State of Connecticut

Survey Area Data: Version 10, Mar 31, 2011

Date(s) aerial images were photographed: 8/5/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

State of Connecticut (CT600)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
45B	Woodbridge fine sandy loam, 3 to 8 percent slopes	0.5	0.5%
45C	Woodbridge fine sandy loam, 8 to 15 percent slopes	4.0	4.5%
73E	Charlton-Chatfield complex, 15 to 45 percent slopes, very rocky	1.1	1.2%
229B	Agawam-Urban land complex, 0 to 8 percent slopes	4.7	5.2%
245B	Woodbridge-Urban land complex, 0 to 8 percent slopes	12.9	14.3%
273C	Urban land-Charlton-Chatfield complex, rocky, 3 to 15 percent slopes	9.8	10.8%
306	Udorthents-Urban land complex	19.6	21.6%
307	Urban land	25.3	27.9%
W	Water	12.7	14.0%
Totals for Area of Interest		90.7	100.0%