FILE ON EDOC'S _____ YES _____ NO
SITE NAME _____
SITE # 130004
COUNTY _____ TOWN _____
FOILABLE _____ YES _____ NO
SC/PSA _____ RI/FS _____
RD _____ RA _____
SM _____ OTHER _____
NAME DESCRIPTION:
Report.hw130004.2005-11-01. ICM - Certification_
Report

REPORT

Interim Corrective Measure Certification Report

Bayer MaterialScience LLC
125 New South Road
Hicksville, New York
USEPA ID No. NYD002920312

November 2005

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

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Certification Statement

I, Joseph Molina III, as a licensed Professional Engineer in the State of New York, to the best of my knowledge, certify that interim corrective measure (ICM) activities performed at the Bayer MaterialScience LLC facility in Hicksville, New York between June 2005 and August 2005 were completed in general accordance with the following:

- the New York State Department of Environmental Conservation- (NYSDEC-) approved *Interim Corrective Measure Work Plan* (BBL, April 2005);
- an April 26, 2005 letter detailing proposed work plan modifications, as approved in a May 17, 2005 letter from the NYSDEC; and
- supplemental correspondence referenced throughout this certification report, which is included in Appendix A.

I also certify that, to the best of my knowledge, this ICM Certification Report accurately summarizes the work activities performed and the analytical results obtained for the ICM.

Joseph Molina III, P.E.
Vice President
NY P.E. License No. 072644

Blasland, Bouck & Lee, Inc.
295 Woodcliff Drive, Third Floor, Suite 301
Fairport, New York 14450

1. Introduction

1.1 General

This report summarizes interim corrective measure (ICM) activities implemented at the Bayer MaterialScience LLC (Bayer) facility located at 125 New South Road in Hicksville, New York (the "Site"). The ICM activities were implemented to address conditions identified during the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) completed between February and October 2004. Work activities performed as part of the ICM included:

- removing a former gasoline underground storage tank (UST) located northeast of the former Plant 1 building in Area of Concern (AOC) 50;
- removing standing water from the foundation sump at the southeast end of Plant 1 (AOC 44);
- removing accumulated debris from the manholes/catch basins, sumps, and floor trenches at the Site that are associated with the following AOCs: 11, 21B, 38, 40, 42 through 46, and 49;
- excavating soils from the former Plant 1 Electrical Transformer Area (AOC 39) that exhibited polychlorinated biphenyls (PCBs) at concentrations above 50 parts per million (ppm); and
- delineating the extent of soils beneath the sump in the northwest corner of the former Pilot Plant (AOC 45) that exhibit PCBs at concentrations above 50 ppm.

The ICM activities were conducted between June 2005 and August 2005 by BBL Environmental Services, Inc. (BBLES) of Syracuse, New York. ICM activities were conducted in general conformance with:

- the New York State Department of Environmental Conservation- (NYSDEC-) approved *Interim Corrective Measure Work Plan* (BBL, April 2005) [referred to herein as the "ICM Work Plan"];
- the ICM Work Plan Modification contained in an April 26, 2005 letter from BBL to the NYSDEC; and
- supplemental correspondence referenced throughout this certification report, which is included in Appendix A.

Conditional approval of the ICM Work Plan and ICM Work Plan Modification was provided in a letter from the NYSDEC dated May 17, 2005.

The organization of this Report is presented below, followed by a summary of relevant background information.

1.2 Report Organization

This Report is organized into the following sections:

Section	Purpose
Section 1 – Introduction	Provides an overview of the ICM activities, site background information, and relevant results from the RFI.
Section 2 – ICM Activities Summary	Presents a detailed description of the ICM activities.
Section 3 – Chronology of Significant Milestone Dates	Presents a chronology of significant milestone dates for the ICM activities.
Section 4 – Modifications to ICM Work Plan	Summarizes modifications made to the ICM Work Plan based on field conditions encountered.
Section 5 – Summary and Conclusions	Provides a brief summary and conclusions based on the results of the ICM activities.

1.3 Background Information

The Site consists of a 14-acre triangular-shaped parcel located just southeast of the intersection of New South Road and Commerce Road in the City of Hicksville, New York. The Site is bordered to the north by industrial properties, to the south and west by the Long Island Railroad and commercial/industrial properties, and to the east by warehouses and the Northrop Grumman Corporation (Northrop Grumman) complex. A site location map is included on Figure 1. Aside from the Administration Building located in the northern portion of the Site, all other buildings and aboveground structures formerly used in connection with Site operations were demolished down to their floor slabs in 2003.

The location of the Administration Building and the concrete slabs from former buildings are shown on the site layout plan included on Figure 2. As shown on Figure 2, a large asphalt-paved parking area is located in the western portion of the Site, and a series of rainwater runoff sumps/recharge basins are located along the eastern property boundary. Additionally, a railroad spur enters the northwestern portion of the Site and splits into two separate lines, including one that continues southward between a former building (Plant 1) and warehouse and a second that extends eastward toward another former building (Plant 2). Access to the Site is limited by a chain-link fence and locking gates.

Non-masonry building materials generated by the demolition activities were transported for offsite reclamation/ disposal. Brick and mortar wall materials generated by demolition activities were crushed and remain stockpiled onsite for future use as hard fill material.

The building floor slabs remaining onsite are constructed of concrete and are generally elevated approximately 2 to 4 feet above the surrounding grade. The ground surface in the vicinity of the floor slabs is generally covered with asphalt or concrete. Varying amounts of construction and demolition debris are scattered on the ground surface in the vicinity of the slabs. Remaining areas of the Site are covered with crushed stone/gravel or vegetation (grass or brush).

Further detailed site background information, including the site history, topography and drainage, and geologic and hydrogeologic setting, are presented in the ICM Work Plan.

1.4 Summary of Relevant RFI Activities

The RFI was implemented by Blasland, Bouck & Lee, Inc. (BBL) in two phases, the first in February 2004 and the second in October 2004. The first phase was conducted in accordance with the approach presented in the *RCRA Facility Assessment/RCRA Facility Investigation Work Plan* prepared by ENSR Corporation (ENSR,

December 2003) [the "RFA/RFI Work Plan"] and e-mail correspondence from BBL to the NYSDEC dated February 18, 2004 and February 23, 2004. The Phase II RFI activities were performed in accordance with the Phase II RFI Work Plan developed in a September 7, 2004 letter from BBL that responds to NYSDEC comments on the *RCRA Facility Investigation Report* (BBL, June 2004) ["the RFI Report"] and in accordance with e-mail correspondence from BBL to the NYSDEC dated September 30, 2004 and October 1, 2004. In general, the RFI included the following efforts:

- geophysical survey activities to identify the location of underground structures within the septic tank/ leachate pit AOCs at the Site (AOCs 35A through 35G during Phase I, and AOCs 35F and 35H through 35M during Phase II) and to identify the location of the suspected gasoline UST in AOC 50;
- debris sampling at 19 locations during Phase I and at one location during Phase II;
- concrete sampling at 19 locations during Phase I and at six locations during Phase II;
- soil sampling at 96 locations within 48 designated AOCs during Phase I and at 17 locations within 13 designated AOCs during Phase II; and
- water sampling at one location (a foundation sump located at the southeast end of Plant 1) during Phase I.

Details of the Phase I RFI field investigation activities and results are presented in the RFI Report. Details of the Phase II RFI field investigation activities and results are presented in the Phase II RFI Report. Findings of the Phase I and Phase II RFI that relate to the ICM work activities are summarized in the subsections below.

1.4.1 Geophysical Survey Results

A suspected UST was identified in AOC 50 (northeast of the former Plant 1 building) by electromagnetic (EM) survey activities during the Phase II RFI. The location of the suspected UST was confirmed by ground-penetrating radar (GPR) survey activities (refer to Figure 2 for the UST location).

1.4.2 Debris Analytical Results

RFI debris analytical results relevant to this ICM are summarized below.

- PCBs were detected at debris sampling location 11-1A (within a catch basin located in the Plant 1 Boiler Condensate Runoff Area) at a concentration of 20 ppm. PCBs were detected at the remaining debris sampling locations at concentrations between an estimated 1.6 ppm and 4.3 ppm.
- One or more semi-volatile organic compounds (SVOCs) were detected at each debris sampling location. The SVOC concentrations detected at several debris sampling locations, particularly locations AOC 21B-1, AOC 38-1, AOC 40-1, AOC 40-2, AOC 40-3, AOC 42-1, AOC 42-2, AOC 43-1, AOC 44-1, AOC 45-1, AOC 45-2, AOC 46-2, AOC 49-1, and AOC 49-2, appeared to be elevated.
- Excluding typical mineral constituents, concentrations of selected inorganic constituents, including barium, cadmium, chromium, copper, lead, mercury, nickel, and zinc, detected in the Phase I debris samples exceeded typical background values. Concentrations of inorganic constituents identified at several debris

sampling locations, particularly locations AOC 40-1, AOC 42-1, AOC 42-2, AOC 44-1, AOC 45-1, AOC 45-2, and AOC 49-2, appeared to be elevated.

No directly-applicable NYSDEC cleanup standards/guidance values were identified for accumulated debris identified within the manholes/catch basins, sumps, floor trenches, and onsite rainwater runoff sump. However, as summarized above, debris encountered at several sampling locations exhibited PCBs, SVOCs, and/or select inorganic constituents at concentrations that appeared to be elevated.

1.4.3 Soil Analytical Results

RFI soil analytical results relevant to this ICM are summarized below.

- PCBs were identified in soils within two areas of the site, including the Former Plant 1 Electrical Transformer Area (AOC 39) and the sump in the northwest corner of the Pilot Plant (~~AOC-45~~), at concentrations exceeding the 50 ppm threshold for a Toxic Substances Control Act- (TSCA-) regulated/New York State hazardous waste, as detailed below:

  - Soil samples collected from the 0- to 1-foot and 1- to 2-foot depth intervals at sampling location AOC 39-2/AOC 39-5 (in the western portion of AOC 39) exhibited PCBs at concentrations of 160 ppm and 190 ppm, respectively. Soil samples collected more than 2 feet below ground surface (bgs) at sampling location AOC 39-2/AOC 39-5 and soil samples collected at adjacent sampling locations AOC 39-3/AOC 39-6 and AOC 39-12 (east and south of AOC 39-2/AOC 39-5, respectively) exhibited PCBs at concentrations well-below 50 ppm. Based on the RFI results and the configuration of the former outdoor electrical transformer area, the extent of soil within AOC 39 that exhibited PCBs at concentrations above 50 ppm was delineated for purposes of ICM soil removal activities; and

  - Soil samples collected from the 0- to 0.2-foot and 0.5- to 1.5-foot depth intervals below the bottom of the concrete-lined sump at sampling location AOC 45-4 exhibited PCBs at concentrations of 2,300 ppm and 1,700 ppm, respectively. Samples were not collected greater than 1.5-feet beneath the bottom of the sump due to refusal of the macro-core sampler, which was advanced via a jack-hammer instead of a direct-push (PowerProbe™) sampling device due to access considerations. The bottom of the sump is approximately 3 to 4 feet below the surrounding grade (approximately 6 to 7 feet below the top of the floor slab for the former Pilot Building). The extent of soil beneath and around the bottom of the sump that exhibits PCBs at concentrations above 50 ppm was not delineated prior to this ICM.

- Volatile organic compounds (VOCs) were not identified in soil samples collected from the 10- to 12-foot depth interval of sampling locations AOC 50-1 and 50-2 (which were immediately adjacent to the suspected former gasoline UST location as identified using EM/GPR survey techniques) at concentrations exceeding the soil guidance values presented in the NYSDEC Technical and Administrative Guidance Memorandum titled "Determination of Soil Cleanup Levels and Cleanup Objectives," HWR-94-4046, dated January 24, 1994 (TAGM 4046). Aside from benzo(a)pyrene, which was identified at an estimated concentration of 0.063 ppm at sampling location AOC 50-2 (10-12'), no SVOCs were identified in the soil samples collected from AOC 50 at concentrations above the TAGM 4046 soil guidance values. The estimated 0.063 ppm benzo(a)pyrene concentration identified at sampling location AOC 50-2 (10-12') only slightly exceeded the 0.060 ppm TAGM 4046 soil guidance value. Headspace screening results for all soil samples collected continuously from grade to the bottom of the soil borings at sampling locations AOC 50-1 and 50-2 (which extended 12 feet bgs) were 0.0 ppm. No visible staining or obvious odors were encountered in any of the soil samples recovered from the AOC 50 soil borings.

2. ICM Activities Summary

2.1 General

This section presents a description of ICM activities conducted to remove the former gasoline UST, remove standing water and debris from subsurface structures, delineate and verify the extent of PCB-impacted soils in the vicinity of AOCs 39 and 45, and excavate PCB-impacted soils from AOC 39. This section also describes the activities completed to characterize, transport, and dispose of wastes generated by the ICM activities. A discussion of the ICM activities is presented in the following subsections:

Subsection Number	Work Task
2.2	Mobilization/Site Preparation
2.3	Underground Storage Tank Removal
2.4	Subsurface Structure Cleaning
2.5	Pre-Excavation Delineation/Verification Soil Sampling
2.6	Soil Excavation
2.7	Air Monitoring
2.8	Site Restoration/Demobilization

Copies of daily field reports prepared by BBLES's onsite construction project manager during the ICM activities are included in Appendix B. Copies of waste manifests and certificates of disposal for wastes generated by the ICM activities are included in Appendix C.

Samples collected as part of the ICM were submitted to Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut for laboratory analysis. Analytical results were reported using NYSDEC Analytical Services Protocol (ASP) Category B deliverables. An analytical sample summary that identifies the samples collected and corresponding analyses performed is included as Table 1. Results of headspace screening and visual characterization of pre-excavation delineation soil samples and verification soil samples collected during the ICM are presented in Tables 2 and 3. Laboratory analytical results for the delineation/verification soil samples and waste characterization samples collected as part of the ICM are presented in Tables 4 through 7. Laboratory analytical data packages and validation reports are included on the compact disc (CD) included with this report. Data validation was performed for each sample delivery group (SDG) where one or more PCB soil analytical results were less than the 50 ppm ICM soil cleanup objective.

A detailed description of each work task associated with the ICM activities is presented below.

2.2 Mobilization/Site Preparation

BBLES mobilized to the Site to initiate the ICM activities on June 7, 2005. Equipment mobilized to the site and used for the ICM activities included a backhoe, PowerProbe™ direct-push sampling rig, conventional hollow-stem auger drill rig, rolloff waste containers, portable water storage tank, and air monitoring equipment for upwind, downwind, and work-zone VOC and particulate monitoring. A site walkover was performed to field-locate structures to be cleaned, identify proposed delineation/verification soil sampling locations in AOCs 39 and 45, and the approximate suspected location of the former gasoline UST. Sampling locations were marked with spray paint/stakes. Selected sampling locations were adjusted slightly based on the presence of an underground waterline south of the former Pilot Plant.

2.3 Underground Storage Tank Removal

On June 8, 2005, BBLES used an excavator to remove soils at the suspected location of the former gasoline UST in AOC 50. Based on a facility design drawing titled "Site Plan" prepared by Rubber Corporation of America (Job No. 5309, Drawing 1), dated December 2, 1953, the top of the tank was reported to be approximately 2.5 feet bgs, and the tank was reported to be 4 feet in diameter and 11 feet long. Based on the tank dimensions shown on the design drawing, the tank capacity was calculated to be approximately 1,000 gallons. Consistent with the design drawing, the top of the tank was encountered approximately 2.5 feet bgs in the field. Soils excavated to uncover and expose the top of the tank were staged on polyethylene sheeting for potential reuse as backfill material. A sample of the soils (sample "UST-AOC-50") was collected on June 8, 2005 for headspace screening using a photoionization detector (PID) and for laboratory analysis for PCBs. Field personnel removed a threaded cap from the top of the tank and determined, by probing and using a glass thief, that the tank was nearly full of liquid (water) and debris (sand). A faint, gasoline-type odor was noticed emanating from the tank.

After the tank's existence was confirmed, BBLES prepared a Petroleum Bulk Storage Application to register the tank for closure. The application was submitted to the Nassau County Fire Marshal, who has been delegated authority by the NYSDEC to implement bulk storage regulations in Nassau County, New York. A copy of the UST registration for closure is included in Appendix D. Following receipt of a tank remover's license from the Nassau County Fire Commission and verbal approval by the Fire Marshal, BBLES performed actual tank removal activities from June 15, 2005 through June 17, 2005. The activities were performed in accordance with the ICM Work Plan and Article XI Nassau County Public Health Ordinance, Section 12.2 and included the following:

- testing the atmosphere inside and outside the tank (for volatile organic vapors, percent oxygen, combustible gas levels) to determine if a potentially hazardous atmosphere existed. Based on the results of air monitoring, a hazardous atmosphere did not exist;

- pumping liquids encountered in the tank (water with a slight sheen on the surface) to a temporary onsite 1,100 gallon polyethylene storage tank. The volume of water removed from the tank was approximately 742 gallons (as determined based on later measurements by the treatment/disposal facility). A representative sample of the liquids removed from the tank (sample "AOC-50 UST Water") was collected and submitted for laboratory analysis for PCBs, Toxicity Characteristic Leaching Procedure (TCLP) VOCs, TCLP SVOCs, TCLP metals, ignitability, corrosivity, and reactivity;

- using manual methods to remove sand encountered in the bottom of the tank. The sand was containerized in eight steel 55-gallon drums. A representative sample of the sand (sample "WC 50-UST Contents") was collected and submitted for laboratory analysis for PCBs, TCLP VOCs, TCLP SVOCs, TCLP metals, ignitability, corrosivity, and reactivity;

- cutting piping associated with the tank to facilitate the removal of the tank from the ground. Additional soils around the tank were excavated to facilitate removal of the tank;

- excavating the tank, which was observed to be constructed of steel and had painted exterior surfaces. The dimensions of the tank were consistent with those shown on the engineering design drawing (approximately 4 feet in diameter by 11 feet long). The tank was transferred to a staging area to facilitate cleaning of its interior and exterior surfaces. Soils that adhered to the tank surfaces were removed using brooms and

cloths/ pads. Some minor rust was observed on the exterior surfaces of the tank, but no corrosion holes or perforations were noticed anywhere on the tank surfaces. The absence of corrosion holes was supported by observations that the tank was full of water until it was pumped to the temporary storage tank in preparation for the tank removal. In addition, soils surrounding the tank were observed to be dry and did not exhibit visible staining, discoloration, or obvious odors. Soils at the excavation limits were observed to be orange/brown sands and gravel. There was no apparent imported bedding material at the bottom of the tank excavation;

- cutting and rendering the tank unfit for further liquid storage. The tank shell was transported offsite to Roth Steel in Syracuse, New York for recycling of the steel. A letter from Roth Steel acknowledging the tank destruction is included in Appendix C; and

- collecting verification soil samples from the UST excavation limits for headspace screening using a PID (to identify the presence/absence of volatile organic vapors) and jar testing (to identify the presence/absence of a petroleum-type sheen or droplets of separate-phase materials). The resulting excavation was approximately 7.5 feet wide, 18 feet long, and 6.5 feet deep. In accordance with the ICM Work Plan Modification, a total of 8 grab sidewall samples (one for approximately every five feet around the excavation perimeter) and 3 discrete grab bottom samples (one for approximately every 5 feet across the excavation floor, taking the larger dimension across the floor) were collected. In addition, one discrete grab sample was collected near a dispenser pipe from the UST. Sidewall samples were collected approximately 4 feet bgs, which was equivalent to a distance of approximately one-third to one-half up the height of the tank. Bottom samples were collected approximately 6.5 feet bgs, and the sample at the dispenser pipe was collected approximately 2.5 feet bgs. No obvious odors were noticed in any of the samples. The PID headspace reading for each sample was 0.0 ppm. Jar tests performed following headspace screening involved filling a jar approximately 90% full with equal parts of soil and tap water, capping and shaking the jar, and visually determining whether any sheens or oil droplets are present on the surface of the soil/water mixture in the jar. No sheens or non-aqueous phase liquid (NAPL) were identified in the jar tests.

Based on the conditions encountered during the UST removal (no corrosion holes in the tank, no visible staining or odors at the excavation limits, no elevated PID headspace screening results, and no sheens/NAPL observed during jar testing) and results of soil samples collected adjacent to the UST during the Phase II RFI, the collection of additional soil samples from the UST excavation for laboratory analysis did not appear to be needed. Based on these findings, BBL sent e-mail correspondence to the NYSDEC dated June 16, 2005 requesting approval to backfill. NYSDEC approval to backfill the UST excavation was provided on June 17, 2005.

Soils that were excavated to uncover and expose the top of the tank were placed (first) as subsurface fill material within the UST excavation. Based on laboratory analytical results for sample "UST-AOC-50", these soils exhibited PCBs at a concentration of 1.1 ppm, which was slightly above the 1 ppm TAGM 4046 surface soil guidance value, but below the 10 ppm TAGM 4046 subsurface soil guidance value. Results of PID headspace screening performed on the soils were 0.0 ppm. Soils from around the tank were placed in the excavation next, and then visually clean soils remaining around the excavation were graded to remove deep depressions and generally meet the surrounding lines and grades. Backfilling of the UST excavation was completed on June 17, 2005.

Following receipt of the laboratory analytical results for samples "AOC-50 UST Water" and "WC 50-UST Contents", the water and sand removed from the UST were transported for proper offsite disposal. Analytical results obtained for these samples and the subsequent handling and offsite transportation/disposal of the water and sand are discussed below:

- Laboratory analytical results for the water sample from the UST are presented in Table 6. As indicated by the results, 1,2-dichloroethane (1,2-DCA) was detected in the sample at a concentration of 0.85 ppm, which exceeds the 0.5 ppm limit for a RCRA characteristic hazardous waste as presented in 40 CFR 261.24 and 6 NYCRR Part 371.3. Based on the results, the 742 gallons of water removed from the UST was transported to the Chemical Waste Management (CWM) Chemical Services LLC facility located in Model City, New York (the "CWM Model City facility") on August 3, 2005 for offsite treatment/disposal as a RCRA hazardous waste (Waste Code D028) [refer to Appendix C for the waste manifest and certificate of disposal].

- Laboratory analytical results for the sample of sand from the UST are presented in Table 7. As indicated by the results, the sand did not exhibit any characteristics of a RCRA hazardous waste and the PCB concentration in the sand (0.87 ppm) was well-below the 50 ppm disposal criterion for a TSCA-regulated/NYS hazardous waste for PCBs as presented in 6 NYCRR Part 371.4(e). Based on the results, the 8 drums of sand were transported to the CWM Model City facility on August 10, 2005 for offsite disposal as a non-hazardous waste [refer to Appendix C for the waste manifest and certificate of disposal].

2.4 Subsurface Structure Cleaning

Subsurface structure cleaning activities were performed between June 7, 2005 and June 17, 2005 to remove standing water (where encountered) and debris from the manholes/catch basins, sumps, and floor trenches associated with the following AOCs: 11, 21B, 38, 40, 42 through 46, and 49. The location of each AOC where structure cleaning was performed is shown on Figure 3. Prior to cleaning each structure, covers (where encountered) were removed to provide access. Accumulated debris was then removed from the structures via manual methods (shovels, brooms, etc.). The debris removed from the structures was placed in the bucket of the onsite backhoe, and then transferred into a lined rolloff waste container for characterization prior to offsite disposal. Debris encountered within the initial few feet of the discharge piping from the catch basins in AOC 11 (Former Plant 1 Boiler Condensate Runoff Area) and AOC 21B (Former Plant 3 Transfer Station Adipic Acid Silos) was also removed.

Standing water was encountered only in two structures, including a catch basin in AOC 21B and a foundation sump at the southeast end of Plant 1 (AOC 44). The water was removed using a submersible pump and transferred into a 55-gallon drum. Based on the small amount of water generated (estimated at 5 to 10 gallons), the water was mixed in and stabilized with the debris in the rolloff waste container.

After the water and debris removal was completed, visual inspections were performed at each structure to look for any debris remaining in the structures and look for any heavy staining or large cracks in the walls/bottom that might suggest impacts to underlying soils. As indicated in the table below, which summarizes results of the visual inspections, the structures appeared to be in generally good condition, with some residual staining on surfaces in selected structures.

AOC #	Description	Type of Structure & Conditions Observed Following Cleaning
11	Former Plant 1 Boiler Condensate Runoff Area	Catch basin with concrete sides and concrete bottom. No cracks or gaps, except minor gap around discharge pipe that conveys flow from the structure to the east. Some residual staining was noticed on the concrete surfaces. A minor amount of debris was observed remaining in the discharge piping after the debris within the structure and the initial few feet of piping had been removed.

AOC #	Description	Type of Structure & Conditions Observed Following Cleaning
21B	Former Plant 3 Transfer Station Adipic Acid Silos	Catch basin with concrete sides and earthen bottom. PID headspace screening measurement for soils at bottom of structure was 0.0 ppm. No residual staining was noticed on concrete or bottom soils. No significant accumulation of debris was noticed in the discharge pipe that conveys flow from the structure to the north. Debris contained within the structure had blocked flow to the discharge pipe and appeared to be the reason for the standing water that was initially encountered at and around the structure. Water drained from the discharge pipe after the debris removal was completed. Based on available site mapping, the ultimate discharge location for the catch basin appears to be the leachate pit in AOC 35-J. Based on the RFI sampling results, soils in the vicinity of the leachate pit are not impacted.
38	Former Plant 2 Exterior Trench	Recessed concrete slab area. Concrete appeared to be in good condition with no apparent voids or significant cracks. No residual staining was noticed on the concrete.
40	Former Plant 3 Trench System	Western section of trench has concrete sides and bottom. Eastern section of trench has concrete sides and earthen bottom. Concrete appeared to be in good condition with no cracks or residual staining. PID headspace screening measurement for soils at bottom of trench was 0.0 ppm. Visibly-stained debris was encountered below concrete that appeared to have been previously installed to cover/ fill a continuing section of the western trench. The stained debris extending beneath the first few feet of the concrete was removed.
42	Former Plant 1 Center Trench	Shallow trench with concrete sides and bottom. Cracks were observed in various locations. No residual staining was noticed on the concrete.
43	Foundation Sump – Northeast End of Former Plant 1	Sump with concrete sides and concrete bottom, except for an interior 18-inch square sump with an earthen bottom. Concrete appeared to be in good condition with no cracks. No residual staining noticed on concrete or bottom soils.
44	Foundation Sump – Southeast End of Former Plant 1	Sump with concrete sides and concrete bottom. Concrete appeared to be in good condition with no significant cracks. No residual staining was noticed on the concrete.
45	Sump in Northwest Corner of Former Pilot Plant	Both upper and lower (interior and exterior) sumps have concrete sides. Concrete was missing from approximately 65% of the interior sump bottom. Concrete sides appeared to be in generally good condition, except for a few minor cracks in the exterior sump. Heavy residual staining was noticed on the sides/bottom of both the interior and exterior sumps. Debris within the initial few feet of pipe chase entering the exterior sump from the south was removed. Additional debris removal from the utility chase could not be performed due to the depth and configuration of the chase.
46	Former Scale Area and Circular Plate Area in the former Plant 2 Foundation	Shallow pit with concrete sides and bottom. Some cracks and voids were noticed around a 3-inch diameter PVC conduit extending vertically into pit. No residual staining (other than rust stains) was noticed on the concrete.

AOC #	Description	Type of Structure & Conditions Observed Following Cleaning
49	Trench Around East Wall of the Former Pilot Plant	Trench with concrete sides and bottom. Concrete appeared to be in good condition, aside from some voids and cracks observed at the east and west ends. No residual staining was noticed on the concrete.

A total of 9 tons of debris were generated by the subsurface structure cleaning activities. After the debris was consolidated in one rolloff waste container, a sample was collected to characterize the debris for disposal purposes. The debris sample (sample "Structure Cleaning Debris") was submitted for laboratory analysis for PCBs, TCLP VOCs, TCLP SVOCs, TCLP metals, ignitability, corrosivity, and reactivity. Laboratory analytical results for the debris sample are presented in Table 7. Based on the analytical results, the debris did not exhibit characteristics of a RCRA hazardous waste. PCBs were identified in the debris at a concentration of 31 ppm, which is below the 50 ppm disposal criterion for a TSCA-regulated/NYS hazardous waste for PCBs as presented in 6 NYCRR Part 371.4(e). However, because the PCB concentration in the waste characterization sample was higher than any of the concentrations identified in the individual RFI debris samples and because the disposal facility preferred not to accept non-hazardous PCB-containing wastes with PCB concentrations above 30 ppm, as a conservative measure, the debris was transported to the CWM Model City facility for offsite disposal as a TSCA-regulated/New York State hazardous waste (Waste Code B007).

The heavily-stained concrete encountered in the interior and exterior Pilot Plant sump (AOC 45) and the debris remaining in the utility chase entering the south side of the AOC 45 sump will be removed and managed accordingly in connection with upcoming slab demolition activities to be performed in accordance with the NYSDEC-approved *Demolition Work Plan* (BBL, July 2005) and Work Plan Modification dated August 15, 2005. As indicated above, debris encountered beneath the concrete in AOC 40 (Former Plant 3 Trench System) will also be removed and properly managed as part of the upcoming slab demolition activities. No further action is proposed for any of the other subsurface structures, unless heavily-stained materials are encountered during the demolition activities.

2.5 Pre-Excavation Delineation/Verification Soil Sampling

An initial round of pre-excavation delineation/verification soil boring and sampling activities was performed on June 8 and 9, 2005 in an effort to determine the horizontal and vertical extent of soils in AOCs 39 and 45 exhibiting PCBs at concentrations above 50 ppm. Soil samples collected during the initial round underwent PID headspace screening and were submitted to the laboratory and then either analyzed for PCBs or archived for potential future analysis, if needed. Based on elevated PID headspace screening results at selected sampling intervals in both AOCs 39 and 45 and preliminary laboratory analytical results which indicated that the extent of PCB-impacted soils in AOC 45 had not yet been delineated, selected archived samples were released for analysis, and a second round of sampling activities was subsequently performed on June 15, 2005. Laboratory analytical results obtained for the second round indicated that additional sampling was needed to further delineate the horizontal and vertical extent of PCB-impacted soils in AOC 45. A third round of soil boring and sampling was performed on June 29 and 30, 2005. The horizontal extent of PCB-impacted soils in AOC 45 was determined by the third round of sampling activities, but the vertical remained unknown. A final round of sampling was performed between August 4 and 9, 2005 to complete the vertical delineation and to refine the horizontal delineation of the PCB-impacted soils in AOC 45. Each round of sampling is discussed in greater detail in the subsections that follow.

2.5.1 First Round of Pre-Excavation Delineation/Verification Soil Sampling

BBLES implemented the first round of delineation/pre-excavation verification soil sampling on June 8 and 9, 2005. In accordance with the ICM Work Plan and ICM Work Plan Modification, soil borings were completed at five locations in AOC 39 (locations VS-39-1 through VS-39-4) and ten locations in AOC 45 (locations VS-45-1 through VS-45-10). The sampling locations are shown on Figures 4 and 5. In addition, as a conservative measure, a soil boring was completed at one additional location (location VS-39-5) approximately 10 feet east of sampling location VS-39-1. Soil borings at locations VS-39-4, VS-45-1, VS-45-2, and VS-45-7 were completed after coring through the concrete slab present at each location. The soil borings were advanced using a direct-push sampling rig to depths ranging from approximately 4 to 8 feet relative to the surrounding grade. Soil samples were continuously collected from each boring using a 4-foot long macro-core sampling device. The soil recovered at each boring was visually characterized for color, texture, and moisture content. In addition, the recovered soil samples were sectioned into two-foot intervals and placed in containers for headspace screening using a PID. Headspace screening was also performed on the upper 2-inches of soil encountered in AOC 39. Headspace screening results are summarized in Table 2. Subsurface conditions encountered at each soil boring location are summarized in Table 3.

Elevated PID headspace screening results were obtained for soil samples collected from two sampling locations in AOC 39 [locations VS-39-1 (2-4') and VS-39-2 (2-4')] and three sampling locations in AOC 45 [locations VS-45-2 (6-8'), VS-45-8 (6-8'), and VS-45-9 (6-8')]. The depth intervals reported herein, unless otherwise noted, are relative to the surrounding grade. No staining or odors were noticed in any of the AOC 39 delineation/verification soil sampling locations, except for a possible slight sheen and faint odor at location VS-39-2 (2-4'). With the following exceptions, no staining or odors were noticed in any of the AOC 45 delineation/verification soil sampling locations:

- *Location VS-45-2 (Immediately East of the Sump in AOC 45):* Visible staining was observed in soils encountered directly below the former Pilot Plant floor slab and approximately 8.0 to 9.8 feet below the slab (equivalent to 5.7 to 7.5 feet below the surrounding grade) at this location. A strong odor was also noticed in the soils recovered from 8.0 to 9.8' below the slab.

- *Location VS-45-9 (Southwest of the Staircase to the Former Pilot Plant):* Possible slight staining was observed in soils encountered approximately 4.7 to 6.0 feet below the ground surface at this location.

Pursuant to the ICM Work Plan, the following delineation/verification soil samples collected from AOCs 39 and 45 were submitted for laboratory analysis for PCBs:

- *AOC 39:* The soil samples from both the 0- to 0.2-foot depth interval and 0.5- to 1.5-foot depth interval at sampling locations VS-39-1, VS-39-4, and VS-39-5, and the soil samples from the 2.5- to 3.5-foot depth interval at locations VS-39-2, VS-39-3, and VS-39-4 were submitted for laboratory analysis for PCBs.

- *AOC 45:* Two samples each from sampling locations VS-45-1 through VS-45-4 (one sample from the 0.5 foot depth interval below the sump and one sample from the 1-foot long interval beginning 2-feet below the bottom of the sump, which is equivalent to approximately 4.5- to 5.0-feet and 6.5- to 7.5-feet below the surrounding grade) were submitted for laboratory analysis for PCBs. Two samples each from the same intervals at locations VS-45-5 through VS-45-10 were submitted to the laboratory and archived for potential future analysis if needed, pending the results for adjacent or overlying/underlying samples.

An analytical sample summary identifying each delineation/verification soil sample collected and corresponding analyses performed is included as Table 1. PCB laboratory analytical results for the delineation/verification soil samples are presented in Table 4 and shown on Figures 4 and 5.

Based on the laboratory analytical results, PCBs were identified in the delineation/verification soil samples collected from AOC 39 at concentrations well-below the 50 ppm ICM soil cleanup objective. In accordance with the ICM Work Plan, soil was later removed from AOC 39 (as described in Subsection 2.6) to a depth of approximately 2 to 2.5 feet below the surrounding grade. The laboratory analytical results indicate that soils remaining at the excavation limits do not exhibit PCBs at concentrations above the 1 ppm TAGM 4046 surface soil guidance value.

PCBs were identified at concentrations above 50 ppm in samples collected from locations VS-45-1 and VS-45-2, within the footprint of the Pilot Plant floor slab. Accordingly, each of the archived samples from locations VS-45-5 through VS-45-10 were analyzed. PCBs were also identified at concentrations above 50 ppm in the two samples collected from location VS-45-7 (also within the footprint of the Pilot Plant floor slab). The PCB concentrations identified at sampling locations VS-45-3, VS-45-5, VS-45-6, VS-45-8, VS-45-9, and VS-45-10 are all less than the 10 ppm TAGM 4046 subsurface soil guidance value.

2.5.2 Second Round of Pre-Excavation Delineation/Verification Soil Sampling

BBLES implemented the second round of pre-excavation delineation/verification soil sampling activities on June 15, 2005 to further evaluate the horizontal and vertical extent of soils in AOC 45 exhibiting PCBs at concentrations exceeding 50 ppm and to evaluate whether VOCs were an actual constituent of interest in AOCs 39 and 45. The additional sampling activities were performed as described in e-mail correspondence to the NYSDEC dated June 16, 2005. Soil borings were completed using direct-push sampling techniques at five locations, including one in AOC 39 and four in AOC 45, as summarized below:

- *AOC 39:* A soil boring was completed at one revisited location in AOC 39 (location VS-39-1) to a depth of approximately 8 feet bgs. No odors were encountered in soil samples recovered from the new boring, and PID headspace screening results for all sampling intervals were 0.0 ppm. Headspace screening was performed using two separate PIDs. The soil sample collected from the 2- to 4-foot interval of the boring (where elevated PID readings were noted during the initial round of sampling) was submitted for laboratory analysis for VOCs, including tentatively-identified compounds (TICs).

- *AOC 45:* Soil borings were completed at three revisited locations in AOC 45 (locations VS-45-2, VS-45-8, and VS-45-9) and at a new location (location VS-45-11) approximately 10 feet east of location VS-45-2. The additional soil borings in AOC 45 were each completed to a depth of approximately 14 to 16 feet bgs. PID headspace screening results for samples collected from the borings ranged from 0.0 ppm to 2.9 ppm, with the maximum at location VS-45-9 (8-10'). Two PIDs were used for the headspace screening. No visible staining or obvious odors were encountered in soil samples recovered from any of the borings. The soil sample collected from location VS-45-9 (8-10') was submitted for laboratory analysis for VOCs, including TICs. This sampling interval/location was selected for VOC analysis because it coincided with the area where elevated PID readings were previously obtained in AOC 45. Soil samples from five depth intervals at both sampling locations VS-45-2 and VS-45-11 (0-0.5', 6.8-7.3', 8.8-9.8', 10.3-12.3', and 12.3-14.3' below the concrete floor slab) were submitted for laboratory analysis for PCBs. Samples from four depth intervals at both locations (0.5-2', 2-4', 4-6', and 14.3-16.3' below the slab) were submitted for laboratory archive. Each of the archived samples, except those from the 2- to 4-foot interval, were later analyzed based on analytical results for the initial sample analyses.

Laboratory analytical results for the soil samples collected during the second round of ICM delineation/ verification soil sampling activities for PCBs and detected VOCs are presented in Tables 4 and 5, respectively, and summarized below.

- Only two VOCs (acetone and methylene chloride) were identified in the soil samples, and the concentrations reported were less than the TAGM 4046 soil guidance values. Based on the results, it is suspected that the elevated headspace screening results obtained during the initial delineation/verification sampling may be due to a PID instrument error.

- PCBs were identified at concentrations above 50 ppm in samples collected between 4 feet and 16.3 feet below the concrete slab at location VS-45-2 and in all samples collected at location VS-45-11.

2.5.3 Third Round of Pre-Excavation Delineation/Verification Soil Sampling

BBLES implemented the third round of pre-excavation delineation/verification soil sampling activities on June 29 and 30, 2005 to further evaluate the horizontal and vertical extent of soils in AOC 45 exhibiting PCBs at concentrations exceeding 50 ppm. The additional sampling activities were performed in accordance with e-mail correspondence to the NYSDEC dated June 27, 2005. Soil borings were completed using direct-push sampling techniques at eleven sampling locations, including three previous sampling locations (locations VS-45-2, VS-45-7, and VS-45-11) and eight new sampling locations (locations VS-45-12 through VS-45-19). The soil boring at each location was completed to a depth of approximately 24 feet below the concrete floor slab after creating a corehole through the slab. PID headspace screening results for samples collected from the borings were 0.0 ppm. Aside from possible slight odors at locations VS-45-18 (4.0-4.9' below the slab) and VS-45-19 (0-2.4' below the slab), no visible staining or obvious odors were encountered in soil samples recovered from any of the borings.

Soil samples collected from one to four selected intervals at locations VS-45-2, VS-45-7, and VS-45-11 and from the same four intervals at locations VS-45-12 through VS-45-14 (0-0.5', 6.8-7.3', 10.3-12.3', and 16-18' below the concrete slab) were submitted for laboratory analysis for PCBs. All samples collected from sampling locations VS-45-15 through VS-45-19 and selected samples from the remaining locations were archived for potential future analysis, if needed. Selected archived samples from locations VS-45-2, VS-45-7, and VS-45-11 were analyzed later based on analytical results for the initial sample analyses.

PCB laboratory analytical results for the soil samples collected during the third round of ICM delineation/ verification soil sampling activities are presented in Table 4 and shown on Figure 5. Findings of the third round of sampling activities are summarized below.

- PCBs were not detected at concentrations above the 50 ppm ICM soil cleanup objective in any of the samples collected from sampling locations VS-45-12, VS-45-13, and VS-45-14. The PCB concentrations identified at these locations were, in fact, less than the 10 ppm TAGM 4046 subsurface soil guidance value. Based on these results, the horizontal extent of soils in AOC 45 exhibiting PCBs at concentrations above 50 ppm had been determined.

- The vertical extent of soils exhibiting PCBs at concentrations above 50 ppm at sampling locations VS-45-7 and VS-45-11 was determined to be no more than 22 feet below the concrete floor slab. The vertical extent of soils exhibiting PCBs at concentrations above 50 ppm at sampling location VS-45-2 was not established.

2.5.4 Fourth Round of Pre-Excavation Delineation/Verification Soil Sampling

BBLES implemented the fourth (final) round of pre-excavation delineation/verification soil sampling activities in AOC 45 between August 4 and 9, 2005. The activities were implemented to complete the vertical delineation of PCB-impacted soils at sampling location VS-45-2 and to refine the horizontal delineation of PCB-impacted soils in the area. The fourth round of sampling was performed in accordance with e-mail correspondence to the NYSDEC dated July 28, 2005 and August 2, 2005. NYSDEC approval of the proposed additional sampling activities was provided in e-mail correspondence dated August 2, 2005.

Soil borings were completed at four locations within the footprint of the former Pilot Plant building (at revisited sampling location VS-45-2 and new locations VS-45-20 through VS-45-22) and at one location southeast of the staircase along the south side of the former Pilot Plant (new location VS-45-23). Drilling at the additional sampling locations was completed using a conventional drill rig (Failing F10) equipped with 3-inch inside-diameter hollow-stem augers. The soil boring at location VS-45-2 was completed to a depth of approximately 60 feet bgs (the approximate depth of the groundwater table in the area), and the soil borings at locations VS-45-20 through VS-45-23 were completed to a depth of approximately 20 feet bgs. Soil samples were collected continuously (beginning 24 feet below the bottom of the concrete floor slab at location VS-45-2 where continuous sampling was previously performed, and beginning immediately below the concrete floor slab/ground surface at the remaining locations) and continuing to the depth of completion. PID headspace screening results for samples collected between 46 and 60 feet below the concrete slab at location VS-45-2 ranged from 24 ppm to 115 ppm. PID headspace screening results for all other samples collected during the fourth round of sampling activities were 0.0 ppm. Visibly-stained soils exhibiting an obvious odor were encountered from approximately 50 to 56 feet below the slab at location VS-45-2 (above and within a clay layer). Soils encountered below 56 feet at location VS-45-2 and soils encountered at each of the other sampling locations did not exhibit visible staining or obvious odors.

Based on the laboratory analytical results obtained for the fourth round of ICM delineation/verification soil sampling, the horizontal and vertical extent of soils in AOC 45 exhibiting PCBs at concentrations above 50 ppm was delineated. The approximate horizontal limits of the impacted soils are shown on Figure 5, and the approximate vertical limits of the impacted soils are shown on the two cross-sections included as Figure 6.

2.6 Soil Excavation

Following completion of the pre-excavation delineation/verification soil sampling in AOC 39, the former concrete transformer pad in AOC 39 was demolished and removed using a backhoe on June 8, 2005. Based on the previous detection of PCBs at concentrations above 50 ppm in soils around the pad (suspected to have originated from electrical transformers formerly on the pad), the resulting concrete debris was assumed to contain PCBs at concentrations above 50 ppm and was loaded into a rolloff waste container for temporary staging prior to offsite transportation and disposal. After the concrete pad had been removed, BBL used the backhoe to excavate PCB-impacted soils from the area. The excavation was expanded a few feet to the west and south (from the limits shown in the ICM Work Plan) to coincide with the concrete foundation walls of the former Plant 1 building.

Upon reaching the anticipated limits of the soil removal activities (as defined by the pre-excavation delineation/verification soil sampling), BBLES observed the condition of the excavation. No staining was observed along the excavation sidewalls or flooring, and no obvious odors were noticed emanating from the excavation. Based on BBLES' observations, post-excavation verification soil samples were not needed. Limits of the final excavation are shown on Figure 4. As shown on Figure 4, the final excavation was approximately

19 feet long by 20 feet wide and 2 feet (minimum) deep. Based on these dimensions, the volume of soil removed from the excavation was approximately 30 cubic yards (CY). Based on the shallow depth of the excavation, sloping/benching of the excavation sidewalls was not needed. Air monitoring was performed in connection with excavation activities, as summarized in Subsection 2.7.

Soils removed from the excavation were transferred into three lined rolloff waste containers, one of which contained concrete debris from demolition of the former transformer pad. BBLES collected a sample to characterize the soils removed from AOC 39 for disposal purposes. The characterization sample (sample "AOC-39 Staged Soil") was submitted for laboratory analysis for PCBs, TCLP VOCs, TCLP SVOCs, TCLP metals, ignitability, corrosivity, and reactivity. Laboratory analytical results for the characterization sample are presented in Table 7.

Based on the analytical results, the soils removed from AOC 39 did not exhibit characteristics of a RCRA hazardous waste. PCBs were identified in the characterization sample at a concentration of 0.94 ppm, which is well-below the 50 ppm disposal criterion for a TSCA-regulated/NYS hazardous waste for PCBs as presented in 6 NYCRR Part 371.4(e). However, because PCBs were previously identified in RFI soil samples collected from AOC 39 at concentrations above 50 ppm, the soils and concrete debris were transported for offsite disposal as a TSCA-regulated/New York State hazardous waste (Waste Code B007) in accordance with the 'As-Found Rule'. Based on weight tickets provided by the disposal facility (CWM Model City), approximately 62.4 tons of soils and concrete debris were generated by the removal activities in AOC 39 and received by CWM for disposal [refer to Appendix C for the waste manifests and certificates of disposal].

Based on the low concentrations of PCBs in soils remaining at the excavation limits (less than the 1 ppm TAGM 4046 surface soil guidance value), the shallow depth of the excavation (2 feet), and existing chain-link fence and locked gates that prevent unrestricted access to the Site, backfilling of the excavation in AOC 39 was deferred until slab demolition activities are performed in accordance with the NYSDEC-approved *Demolition Work Plan* (BBL, July 2005). Exempt (non-impacted) construction and demolition debris generated by the slab demolition activities will be used to backfill the excavation.

2.7 Air Monitoring

Airborne monitoring for particulate (dust) and volatile organic vapors was conducted during the ICM removal activities in accordance with the New York State Department of Health's (NYSDOH's) Community Air Monitoring Plan, dated June 2000. Dust monitoring was conducted using a Real-Time Aerosol Monitor (mini-RAM). Volatile organic vapor monitoring was conducted using a PID. Air monitoring equipment was calibrated daily, prior to the start of work activities.

Air monitoring results were recorded by the onsite health and safety supervisor at a minimum frequency of once per hour, unless site conditions and work activities did not cause the generation of dust. Hourly monitoring readings are summarized on the air monitoring logs included in Appendix E.

The ICM Work Plan specified that if particulate monitoring indicated ambient dust levels in the worker breathing zone exceeded the action level of 100 micrograms per cubic meter ($\mu g/m^3$) above background, the level of particulates was to be manually recorded at the downwind perimeter of the work area at 15-minute intervals. The worker breathing zone action level was not exceeded during the ICM activities, and manual 15-minute readings were not needed. The ICM Work Plan also specified that if the level of particulates at the downwind perimeter of the work area was 150 $\mu g/m^3$ (above site background) or greater, or if visible airborne dust was observed leaving the work area, then work activities were to cease and additional dust control

techniques employed to maintain particulate levels below 150 $\mu g/m^3$ and to prevent visible dust migration. Because visible dust was not observed leaving the work area and the 150 $\mu g/m^3$ action level was not exceeded during the ICM activities, there were no dust-related work stoppages.

In accordance with the ICM Work Plan, a PID was used to monitor the worker breathing zone for total organic vapor (TOV) levels during the removal activities. PID monitoring was performed continuously during the implementation of the work activities, and the results were recorded at a minimum frequency of once per hour. The ICM Work Plan specified that if the sustained level of TOV in the worker breathing zone exceeded 5 ppm above background, then the TOV levels were to be manually recorded at the downwind perimeter of the work area (i.e., the exclusion zone) at 15-minute intervals. This action level was not exceeded during the ICM activities.

2.8 Site Restoration/Demobilization

Equipment used during the ICM activities (including the backhoe and miscellaneous hand tools) were decontaminated prior to demobilization. The demobilization of equipment, materials, and personnel related to the soil excavation, UST removal, and structure cleaning activities was completed on June 17, 2004. The demobilization of drilling equipment used for the delineation/verification soil sampling activities was completed on August 11, 2005. Prior to the demobilization, general site cleanup activities were conducted to remove miscellaneous materials utilized during the ICM activities.

3. Chronology of Significant Milestone Dates

A chronology of significant milestone dates for the ICM activities is presented in the table below.

Activity	Dates
ICM Delineation/Pre-Excavation Verification Soil Sampling Activities:	
• Initial round of delineation/pre-excavation verification soil sampling	6/7/05
• Second round of delineation/pre-excavation verification soil sampling (conducted to evaluate the potential presence of VOCs and to further delineate the extent of PCB-impacted soils in AOC 45)	6/15/05
• Third round of delineation/pre-excavation verification soil sampling (conducted to further delineate the extent of PCB-impacted soils in AOC 45)	6/29/05 – 6/30/05
• Final round of delineation/pre-excavation verification soil sampling (conducted to refine the delineation of PCB-impacted soils in AOC 45)	8/4/05 – 8/10/05
Subsurface Structure Cleaning Activities	6/7/05 – 6/17/05
AOC 39 Excavation Activities	6/7/05 – 6/17/05
UST Removal Activities	6/15/05 – 6/17/05

4. Modifications to ICM Work Plan

The NYSDEC-approved *Interim Corrective Measures Work Plan* (BBL, April 2005) was modified slightly based on field conditions encountered during the ICM activities, as detailed below.

- The ICM Work Plan called for the collection of soil samples from the 0.0- to 0.2-foot and 0.5- to 1.5-foot depth intervals at sampling locations VS-39-2 and VS-39-3 along the west and south sidewalls of the soil excavation in AOC 39. However, the excavation in AOC 39 was expanded a few feet to the west and south (from the limits shown in the ICM Work Plan) to coincide with the concrete foundation walls of the former Plant 1 building. Soils within the excavation limits were removed to depths of approximately 2 to 2.5 feet relative to the surrounding grade. As a result, no soil remained at the previously proposed sampling intervals along the south and west sidewalls of the excavation. Accordingly, samples were instead collected from the 2.5- to 3.5-foot depth intervals.

- Based on PID headspace screening results for samples collected during the initial round of delineation/ verification soil sampling, the scope of the ICM activities was expanded to include the collection of soil samples from AOCs 39 and 45 for laboratory analysis for VOCs. As discussed in Subsection 2.5, soil samples from two sampling locations (locations VS-39-1 and VS-45-9) were submitted for laboratory analysis for VOCs. Results indicated that VOCs were not actual constituents of interest in AOCs 39 or 45.

- Based on the PCB analytical results for the soil samples collected during the initial round of delineation and verification soil sampling activities, the scope of the ICM activities was expanded to include additional PCB soil sampling in AOC 45. Three additional rounds of pre-excavation delineation/verification soil sampling were performed to further delineate the extent of PCB-impacted soils in AOC 45. The additional sampling was performed as set forth in e-mail correspondence to the NYSDEC dated June 16, 2005; June 27, 2005; July 28, 2005; and August 2, 2005 (refer to Appendix A for copies of the correspondence).

- The PCB-impacted soils and concrete debris removed from AOC 39 were loaded into rolloff waste containers instead of being direct-loaded for offsite disposal or placed in lined material staging areas for temporary staging prior to offsite disposal. The rolloff waste containers were lined with polyethylene sheeting prior to use and covered with tarps at the end of each workday and prior to offsite transportation and disposal.

5. Summary and Conclusions

The ICM activities have been completed, resulting in the removal of the following:

- the former 1,000 gallon gasoline UST located northeast of the former Plant 1 building in AOC 50;
- standing water from the foundation sump at the southeast end of Plant 1 (AOC 44);
- accumulated debris from the manholes/catch basins, sumps, and floor trenches at the Site associated with AOCs 11, 21B, 38, 40, 42 through 46, and 49; and
- soils within AOC 39 that exhibited PCBs at concentrations above 50 ppm.

Based on observations made during the ICM and based on the results of sampling performed adjacent to the former gasoline UST as part of the RFI and ICM, there was no evidence of a release from the former tank. No further action is proposed for AOC 50.

Based on visual inspections performed at the conclusion of the subsurface structure cleaning activities, debris contained within the subsurface structures was successfully removed and there were no obvious signs of impacted underlying soils (other than at AOC 45). No further action is proposed for the subsurface structures, except for the structures associated with AOCs 40 and 45, which will be further addressed during upcoming slab demolition activities to be implemented in accordance with the NYSDEC-approved *Demolition Work Plan* (BBL, July 2005) and Work Plan Modification dated August 15, 2005, as follows:

- Debris encountered beneath the concrete previously used to fill a portion of the former Plant 3 trench system (AOC 40) will be removed when the concrete floor slab in the area is removed. The debris will be collected, characterized, and transported for proper offsite disposal.
- The heavily-stained concrete encountered in the interior and exterior Pilot Plant sump (AOC 45) and the debris remaining in the utility chase entering the south side of the sump will be removed and transported for proper offsite disposal. In addition, soils within and around AOC 45 exhibiting PCBs at concentrations above 50 ppm (as delineated by the ICM) will be addressed via removal. A work plan detailing the proposed soil removal activities in the Pilot Plant area will be submitted to the NYSDEC under separate cover.

Based on the verification soil sampling results for AOC 39, no further action is proposed for that AOC.

Following completion of the proposed additional removal activities described above and completion of the slab demolition activities, Bayer will propose final corrective measures (where needed) to address remaining environmental conditions, as identified in the NYSDEC-approved RFI Report. These final measures, anticipated to include institutional controls (Declaration of Covenants and Restrictions and a Site Management Plan), will be implemented to attain site closure and allow for property transfer to a new owner for economic redevelopment. The AOCs anticipated to be included in the Site Management Plan are identified in Table 8 (an updated version of Table 15 from the Phase II RFI Report).

Tables

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TABLE 1
ANALYTICAL SAMPLE SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample Type/Area/ Sample ID	Reported Sample Depth	Sample Depth Relative to Surrounding Grade	Date Sampled	SDG#	Validation	Laboratory Analyses: PCBs	VOCs	TCLP VOCs	TCLP SVOCs	TCLP Metals	Ignitability; Corrosivity; Reactivity
DELINEATION/VERIFICATION SOIL SAMPLES											
AOC 39 - Former Plant 1 Electrical Transformer Area											
VS-39-1/VS-39-1R	(0.0-0.2')	(0.0-0.2')	6/8/2005	209769	✔	✔					
	(0.5-1.5')	(0.5-1.5')	6/8/2005	209769	✔	✔					
	(2.5-4.0')	(2.5-4.0')	6/15/2005	209867			✔				
VS-39-2	(2.5-3.5')	(2.5-3.5')	6/8/2005	209769	✔	✔					
VS-39-3	(2.5-3.5')	(2.5-3.5')	6/8/2005	209769	✔	✔					
VS-39-4	(0.0-0.2')	(0.0-0.2')	6/8/2005	209769	✔	✔					
	(0.5-1.5')	(0.5-1.5')	6/8/2005	209769	✔	✔					
	(2.5-3.5')	(2.5-3.5')	6/8/2005	209769	✔	✔					
VS-DUP-1 [VS-39-4]	(0.5-1.5')	(0.5-1.5')	6/8/2005	209769	✔	✔					
VS-39-5	(0.0-0.2')	(0.0-0.2')	6/8/2005	209769	✔	✔					
	(0.5-1.5')	(0.5-1.5')	6/8/2005	209769	✔	✔					
AOC 45 - Sump in Northwest Corner of Pilot Plant											
VS-45-1	(6.8-7.3')	(4.5-5.0')	6/9/2005	209797	✔	✔					
	(8.8-9.8')	(6.5-7.5')	6/9/2005	209797	✔	✔					
VS-DUP-2 [VS-45-1]	(8.8-9.8')	(6.5-7.5')	6/9/2005	209797	✔	✔					
VS-45-2/VS-45-2R	(0.0-0.5')*	(2.3-1.8' Above)	6/15/2005	209867		✔					
	(0.5-2.0')*	(1.8-0.3' Above)	6/15/2005	209867		✔					
	(4.0-6.0')*	(1.7-3.7')	6/15/2005	209867		✔					
	(6.8-7.3')	(4.5-5.0')	6/9/2005	209797	✔	✔					
	(6.8-7.3')*	(4.5-5.0')	6/15/2005	209867		✔					
	(8.8-9.8')	(6.5-7.5')	6/9/2005	209797	✔	✔					
	(8.8-9.8')*	(6.5-7.5')	6/15/2005	209867		✔					
	(10.3-12.3)*	(8.0-10.0')	6/15/2005	209867		✔					
	(12.3-14.3')*	(10.0-12.0')	6/15/2005	209867		✔					
	(14.3-16.0')*	(12.0-13.7')	6/15/2005	209867		✔					
	(16.0-18.0')*	(13.7-15.7')	6/29/2005	210028	✔	✔					
	(22.0-24.0')*	(19.7-21.7')	6/29/2005	210028	✔	✔					
	(26.0-28.0')	(23.7-25.7')	8/4/2005	210596		✔					
	(30.0-32.0')	(27.7-29.7')	8/4/2005	210407	✔	✔					
	(34.0-36.0')	(31.7-33.7')	8/4/2005	210407	✔	✔					
	(40.0-42.0')	(37.7-39.7')	8/4/2005	210407	✔	✔					
	(44.0-46.0')	(41.7-43.7')	8/4/2005	210407	✔	✔					
	(50.0-52.0')	(47.7-49.7')	8/4/2005	210407	✔	✔					
VS-DUP-4 [VS-45-2]	(16.0-18.0')	(13.7-15.7')	6/29/2005	210028	✔	✔					
VS-45-DUP-1 [VS-45-2]	(34.0-36.0')	(31.7-33.7')	8/4/2005	210407	✔	✔					
VS-45-3	(4.5-5.0')	(4.5-5.0')	6/9/2005	209797	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/9/2005	209797	✔	✔					
VS-45-4	(4.5-5.0')	(4.5-5.0')	6/9/2005	209797	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/9/2005	209797	✔	✔					
VS-45-5	(4.5-5.0')	(4.5-5.0')	6/8/2005	209797	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/8/2005	209797	✔	✔					
VS-45-6	(4.5-5.0')	(4.5-5.0')	6/8/2005	209797	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/8/2005	209797	✔	✔					
VS-45-7/VS-45-7R	(0.0-0.5')*	(2.3-2.8' Above)	6/29/2005	210028	✔	✔					
	(6.8-7.3')	(4.5-5.0')	6/9/2005	209797	✔	✔					
	(8.8-9.8')	(6.5-7.5')	6/9/2005	209797	✔	✔					
	(10.3-12.3')*	(8.0-10.0')	6/29/2005	210028	✔	✔					
	(12.3-14.3')*	(10.0-12.0')	6/29/2005	210028	✔	✔					
	(14.3-16.0')*	(12.0-13.7')	6/29/2005	210028	✔	✔					
	(22.0-24.0')*	(19.7-21.7')	6/29/2005	210028	✔	✔					
VS-45-8	(4.5-5.0')	(4.5-5.0')	6/8/2005	209769	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/8/2005	209769	✔	✔					
VS-45-9/VS-45-9R	(4.5-5.0')	(4.5-5.0')	6/8/2005	209769	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/8/2005	209769	✔	✔					
	(8.0-10.0')	(8.0-10.0')	6/15/2005	209867			✔				
VS-45-10	(4.5-5.0')	(4.5-5.0')	6/9/2005	209797	✔	✔					
	(6.5-7.5')	(6.5-7.5')	6/9/2005	209797	✔	✔					
VS-45-11/VS-45-11R	(0.0-0.5')	(2.3-1.8' Above)	6/15/2005	209867		✔					
	(2.0-4.0')	(0.3 Above-1.7' Below)	6/15/2005	209867		✔					
	(6.8-7.3')	(4.5-5.0')	6/15/2005	209867		✔					
	(8.8-9.8')	(6.5-7.5')	6/15/2005	209867		✔					

TABLE 1
ANALYTICAL SAMPLE SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample Type/Area/ Sample ID	Reported Sample Depth	Sample Depth Relative to Surrounding Grade	Date Sampled	SDG#	Validation	Laboratory Analyses: PCBs	VOCs	TCLP VOCs	TCLP SVOCs	TCLP Metals	Ignitability, Corrosivity, Reactivity
VS-45-11/VS-45-11R	(10.3-12.3')	(8.0-10.0')	6/15/2005	209867		✔					
	(12.3-14.3')	(10.0-12.0')	6/15/2005	209867		✔					
	(14.3-16.0')	(12.0-13.7')	6/15/2005	209867		✔					
	(16.0-18.0')*	(13.7-15.7')	6/29/2005	210028	✔	✔					
	(22.0-24.0')*	(29.7-21.7')	6/29/2005	210028	✔	✔					
VS-DUP-3 [VS-45-11]	(10.3-12.3')	(8.0-10.0')	6/15/2005	209869		✔					
VS-45-12	(0.0-0.5')	(2.3-1.8' Above)	6/29/2005	210028	✔	✔					
	(6.8-7.3')	(4.5-5.0')	6/29/2005	210028	✔	✔					
	(10.3-12.3')	(8.0-10.0')	6/29/2005	210028	✔	✔					
	(16.0-18.0')	(13.7-15.7')	6/29/2005	210028	✔	✔					
VS-45-13	(0.0-0.5')	(2.3-1.8' Above)	6/29/2005	210048	✔	✔					
	(6.8-7.3')	(4.5-5.0')	6/29/2005	210048	✔	✔					
	(10.3-12.3')	(8.0-10.0')	6/29/2005	210048	✔	✔					
	(16.0-18.0')	(13.7-15.7')	6/29/2005	210048	✔	✔					
VS-45-14	(0.0-0.5')	(2.3-1.8' Above)	6/30/2005	210048	✔	✔					
	(6.8-7.3')	(4.5-5.0')	6/30/2005	210048	✔	✔					
	(10.3-12.3')	(8.0-10.0')	6/30/2005	210048	✔	✔					
	(16.0-18.0')	(13.7-15.7')	6/30/2005	210048	✔	✔					
VS-DUP-5 [VS-45-14]	(0.0-0.5')	(2.3-1.8' Above)	6/30/2005	210048	✔	✔					
VS-45-20	(0.0-0.5')	(2.3-1.8' Above)	8/9/2005	210452	✔	✔					
	(6.8-7.3')	(4.5-5.0')	8/9/2005	210452	✔	✔					
	(10.0-12.0')	(7.7-9.7')	8/9/2005	210452	✔	✔					
	(16.0-18.0')	(13.7-15.7')	8/9/2005	210452	✔	✔					
	(20.0-22.0')	(17.7-19.7')	8/9/2005	210596		✔					
VS-45-21	(0.0-0.5')	(2.3-1.8' Above)	8/9/2005	210452	✔	✔					
	(6.8-7.3')	(4.5-5.0')	8/9/2005	210452	✔	✔					
	(10.0-12.0')	(7.7-9.7')	8/9/2005	210452	✔	✔					
	(16.0-18.0')	(13.7-15.7')	8/9/2005	210452	✔	✔					
VS-45-22	(0.0-0.5')	(2.3-1.8' Above)	8/8/2005	210454	✔	✔					
	(6.8-7.3')	(4.5-5.0')	8/8/2005	210454	✔	✔					
	(10.0-12.0')	(7.7-9.7')	8/8/2005	210454	✔	✔					
	(16.0-18.0')	(13.7-15.7')	8/8/2005	210454	✔	✔					
VS-45-DUP-2 [VS-45-22]	(6.8-7.3')	(4.5-5.0')	8/8/2005	210452	✔	✔					
VS-45-23	(4.5-5.0')	(4.5-5.0')	8/9/2005	210454	✔	✔					
	(6.5-7.5')	(6.5-7.5')	8/9/2005	210454	✔	✔					
VS-45-DUP-3 [VS-45-23]	(4.5-5.0')	(4.5-5.0')	8/9/2005	210452	✔	✔					
UST-AOC-50	(0.0-2.5')	(0.0-2.5')	6/8/2005	209769	✔	✔					
WASTE CHARACTERIZATION SAMPLES											
Soil/Debris Samples											
AOC 39 - Staged Soil	--	--	6/9/2005	209798		✔		✔	✔	✔	✔
Structure Cleaning Debris	--	--	6/9/2005	209798		✔		✔	✔	✔	✔
WC 50 - UST Contents	--	--	6/16/2005	209869		✔		✔	✔	✔	✔
Wastewater Sample											
AOC-50 UST Water	--	--	6/9/2005	209798		✔		✔	✔	✔	✔

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) on the dates indicated above.
2. Samples were analyzed by Severn Trent Laboratories, Inc. (STL) of Shelton, Conneticut.
3. Samples were analyzed for the following constituents:
   - Polychlorinated biphenyls (PCBs) using United States Environmental Protection Agency (USEPA) SW-846 Method 8082;
   - Toxicity Characteristic Leaching Procedure (TCLP) volatile organic compounds (VOCs) using USEPA SW-846 Methods 1311 for extraction and 8260B for analysis;
   - TCLP semi-volatile organic compounds (SVOCs) using USEPA SW-846 Methods 1311 for extraction and 8270C for analysis;
   - TCLP metals using USEPA SW-846 Methods 1311 for extraction and 6010 for analysis;
   - Corrosivity using USEPA SW-846 Method 9045C;
   - Ignitability using USEPA SW-846 Method 1010;
   - Reactive Cyanide using USEPA SW-846 Method 7.3.3; and
   - Reactive Sulfide using USEPA SW-846 Method 7.3.4.
4. DUP = Blind Duplicate [corresponding sampling location is identified in brackets].
5. -- = Samples were composite characterization samples; sample depth is not applicable.
6. Sample depths marked by an asterisk (*) indicate that an 'R' was included in the sample ID identified on the chain-of-custody form. The 'R' designates a sample from a re-visited sampling location.
7. Reported sample depths are as listed on the chain-of-custody forms submitted to the laboratory and are relative to the bottom of the concrete slab (for sampling locations within the former Pilot Plant footprint) and the surrounding grade (for all other sampling locations).

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-39-1	(0.0-1.5')	0.0
	(2.0-4.0')	--
VS-39-1R	(2.5-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
VS-39-2	(0.0-0.2')	0.0
	(0.2-0.5')	0.0
	(0.5-1.5')	0.0
	(2.0-4.0')	--
VS-39-3	(0.0-0.2')	0.0
	(0.2-0.5')	0.0
	(0.5-1.5')	0.0
	(1.5-2.5')	0.0
	(2.5-3.5')	0.0
VS-39-4	(0.0-0.2')	0.0
	(0.2-0.5')	0.0
	(0.5-1.5')	0.0
	(1.5-2.5')	0.0
	(2.5-3.5')	0.0
VS-39-5	(0.0-0.2')	0.0
	(0.2-0.5')	0.0
	(0.5-1.5')	0.0
	(1.5-2.5')	0.0
	(2.5-3.5')	0.0
VS-45-1	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
VS-45-2	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	--
VS-45-2R	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.4
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	1.7

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-45-2R	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
	(24.0-26.0')	0.7
	(26.0-28.0')	0.0
	(28.0-30.0')	0.3
	(30.0-32.0')	0.0
	(32.0-34.0')	0.0
	(34.0-36.0')	0.0
	(36.0-38.0')	0.0
	(38.0-40.0')	0.0
	(40.0-42.0')	0.0
	(42.0-44.0')	0.0
	(44.0-46.0')	0.0
	(46.0-48.0')	73.4
	(48.0-50.0')	61.2
	(50.0-52.0')	105.0
	(52.0-54.0')	115.0
	(54.0-56.0')	100.0
	(56.0-58.0')	54.0
	(58.0-60.0')	24.0
VS-45-3	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
VS-45-4	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
VS-45-5	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
VS-45-6	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
VS-45-7	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-45-7R	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-8	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	--
VS-45-8R	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	1.0
VS-45-9	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	--
VS-45-9R	(8.0-10.0')	2.9
	(10.0-12.0')	0.0
	(12.0-14.0')	1.2
	(14.0-16.0')	0.0
VS-45-10	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
VS-45-11	(0.0-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	2.2

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-45-11R	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-12	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-13	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-14	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-45-15	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-16	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-17	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-18	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-45-18	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-19	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
	(22.0-24.0')	0.0
VS-45-20	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
VS-45-21	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0

TABLE 2
HEADSPACE SCREENING SUMMARY

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Reported Sample Depth	PID Measurement (ppm)
VS-45-21	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
VS-45-22	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
	(20.0-22.0')	0.0
VS-45-23	(0.0-0.5')	0.0
	(0.5-2.0')	0.0
	(2.0-4.0')	0.0
	(4.0-6.0')	0.0
	(6.0-8.0')	0.0
	(8.0-10.0')	0.0
	(10.0-12.0')	0.0
	(12.0-14.0')	0.0
	(14.0-16.0')	0.0
	(16.0-18.0')	0.0
	(18.0-20.0')	0.0
UST-AOC-50	(0.0-2.5')	0.0

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June and August 2005.
2. Headspace screening measurements were obtained using a photoionization detector (PID).
3. Concentrations reported in parts per million (ppm), which is equivalent to milligrams per kilogram (mg/kg).
4. The 'R' included in selected sample IDs indicates the sample was collected from a revisited sampling location.
5. -- indicates the original reading is believed to be the result of instrument error. Follow-up sampling and screening/laboratory analysis supports this conclusion.

TABLE 3
SOIL SAMPLE VISUAL CHARACTERIZATION RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID/ Depth Interval	Description
VS-39-1	
0.0-0.5'	Dark brown, fine-to-medium sand, trace fine-to-medium gravel, trace clay
0.5-1.3'	Brown, fine-to-medium sand, fine-to-medium gravel, trace clay
2.0-4.0'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, faint odor, slight stain
VS-39-1R	
2.5-4.0'	Orange, fine-to-medium sand, some fine-to-medium gravel
4.0-6.6'	Orange/Light brown, coarse-to-fine sand, little fine-to-medium gravel, moist
VS-39-2	
0.0-0.3'	Dark brown, fine-to-medium sand, little fine-to-medium gravel, trace organic material, moist
0.3-1.2'	Orange/brown, fine-to-medium sand, some fine-to-medium gravel, moist
2.0-4.0'	Orange/brown, fine-to-medium sand, some fine-to-medium gravel, moist
VS-39-3	
0.0-0.7'	Light brown, fine-to-medium sand, some fine-to-coarse gravel, moist
0.7-2.3'	Brown, fine-to-coarse sand, little fine-to-medium gravel, moist
VS-39-4	
0.0-1.8'	Brown, fine-to-medium sand, some fine-to-medium gravel, trace silt, moist
1.8-2.7'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, moist
VS-39-5	
0.0-0.8'	Light brown, fine-to-medium sand, some fine-to-coarse gravel, trace silt, moist
0.8-2.4'	Dark brown, fine-to-medium sand, little fine-to-medium gravel, moist
VS-45-1	
0.0-2.0'	Dark brown, fine sand, some fine-to-medium gravel, little silt, moist
4.0-4.7'	SAA
4.7-6.5'	Brown, fine-to-coarse sand, some fine-to-medium gravel, moist
8.0-9.2'	Orange/brown, fine-to-medium sand, trace fine-to-medium gravel, moist
VS-45-2	
0.0-2.0'	Dark brown, fine-to-medium sand, some fine-to-medium gravel, trace silt, moist
4.0-4.7'	SAA
4.7-7.1'	Light brown, fine-to-medium sand, little fine-to-medium gravel, moist
8.0-9.8'	Brown, fine-to-medium sand, little fine-to-medium gravel, visible product stain, strong odor (sweet smell)
VS-45-2R	
10-16'	Not available
VS-45-2R	
16.0-16.4'	Brown, fine-to-medium sand, little fine-to-medium gravel, moist, slight petroleum odor, non-aqueous liquid
16.4-18.6'	Orange/brown, fine-to-medium sand, trace coarse sand/fine gravel, dry
20.0-24.7'	SAA
VS-45-2R	
24.0-42.0'	Reddish brown, fine-to-medium sand, some fine gravel, moist
42.0-43.0'	Light brown, fine-to-medium sand, some fine gravel, moist
43.0-44.0'	Reddish brown, fine-to-medium sand, some fine gravel, moist
44.0-47.3'	Light to Reddish brown, fine-to-medium sand, some fine gravel, moist
47.3-48.6'	Black, fine sand, no gravel, very wet, odor
48.6-48.7'	Grey, 1-inch thick zone of dense clay (hard)
48.7-50.0'	Reddish brown, fine sand, no gravel, moist
50.0-55.5'	Black, clayey silt, with zones of 1-inch thick layers of hard, dense clay, moist
55.5-58.0'	Light brown, fine silt, some sand, moist
58.0-60.0'	Very light brown to tan, fine silt, moist
VS-45-3	
0.0-2.0'	Brown, fine-to-medium sand, trace fine-to-medium gravel/silt, moist
4.0-5.2'	Light brown, fine-to-medium sand, trace fine-to-medium gravel, moist
5.2-5.4'	Pulverized wood, moist
5.4-6.4'	Orange/brown, fine-to-coarse sand, trace fine-to-medium gravel, moist

TABLE 3
SOIL SAMPLE VISUAL CHARACTERIZATION RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID/ Depth Interval	Description
VS-45-4	
0.0-0.5'	Dark brown, fine sand, moist
0.5-2.0'	Brown, fine sand, trace fine gravel, moist
4.0-4.9'	Brown/orange, fine-to-medium sand, some fine-to-medium gravel, trace silt, moist
4.9-6.0'	Orange/brown, fine-to-medium sand, some fine-to-medium gravel, trace silt, moist
VS-45-5	
0.0-1.2'	Dark brown, fine-to-coarse sand, little fine-to-medium gravel, trace silt, moist
1.2-2.9'	Light brown, fine-to-medium sand, some fine-to-medium gravel, moist
4.0-7.2'	Orange/brown, fine-to-medium sand, trace fine-to-medium gravel, moist
VS-45-6	
0.0-1.0'	Dark brown, fine-to-coarse sand, some fine-to-medium gravel, trace silt, moist
1.0-2.1'	Light brown, fine-to-medium sand, little fine-to-medium gravel, moist
4.0-6.7'	Orange/brown, fine-to-coase sand, some fine-to-medium gravel, moist
VS-45-7	
0.0-2.1'	Dark brown, fine sand, some fine-to-medium gravel, little silt, moist
4.0-4.3'	SAA
4.3-7.0'	Light brown, fine-to-medium sand, some fine-to-medium gravel, moist
8.0-9.9'	Orange/brown, fine-to-medium sand, trace fine-to-medium gravel, moist
VS-45-7R	
0.0-2.0'	Brown, fine-to-medium sand, some fine-to-medium gravel, trace silt, moist
4.0-4.8'	SAA
4.8-6.6'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, trace silt, moist
8.0-11.0'	Orange/brown, fine-to-medium sand, trace fine-to-medium gravel, moist
12.0-15.0'	SAA
16.0-19.1'	Orange fine-to-coarse sand, little fine-to-medium gravel, moist
20.0-24.0'	SAA
VS-45-8	
0.0-1.7'	Brown/tan, fine-to-medium sand, trace fine gravel, moist
4.0-6.4'	SAA, slight stain from 6.1-6.4'
VS-45-8R	
6.0-8.8'	Light brown/orange, medium-to-coarse sand, some fine-to-medium gravel, moist
10.0-12.6'	Orange/light tan, medium-to-coarse sand, some fine-to-medium gravel, moist
VS-45-9	
0.0-1.8'	Orange/brown, fine-to-medium sand, trace fine gravel, moist
4.0-4.3'	SAA
4.3-4.7'	Grey, fine-to-coarse sand, some fine-to-coarse gravel, moist
4.7-6.0'	Orange/brown, fine-to-medium sand, little fine gravel, moist, faint odor (stain from 5.8-6.0')
VS-45-9R	
8.0-10.4'	Orange, medium-to-coarse sand, some medium-to-fine gravel, moist
12.0-14.8'	SAA
VS-45-10	
0.0-3.1'	Light brown, fine sand, trace medium sand & fine gravel, moist
4.0-6.9'	Brown fine sand, trace medium sand & fine gravel, wet at 5.2'
VS-45-11	
0.0-1.7'	Dark brown, fine-to-medium sand, little fine-to-medium gravel, trace silt, moist
4.0-5.0'	Grey/brown, medium-to-fine sand, some fine-to-medium gravel, trace wood debris throughout
5.0-6.9'	Light brown, fine-to-coarse sand, little fine-to-medium gravel, moist
8.0-9.4'	Light brown, fine-to-medium sand, little fine-to-medium gravel, moist
9.4-10.9'	SAA, but orange in color
12.0-13.3'	SAA
13.3'-14.6'	Light brown, fine-to-coarse sand, some fine-to-medium gravel, moist

TABLE 3
SOIL SAMPLE VISUAL CHARACTERIZATION RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID/ Depth Interval	Description
VS-45-11R	
16.0-19.2'	Light brown, fine-to-medium sand, little fine-to-medium gravel, moist
20.0-21.2'	SAA
21.2-23.1'	Orange, fine-to-coarse sand, little fine-to-medium gravel, moist
VS-45-12	
0.0-1.7'	Brown, fine-to-medium sand, some silt, little fine-to-medium gravel, moist
4.0-4.2'	SAA
4.2-6.6'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, moist
8.0-8.6'	Light brown, fine sand, trace fine gravel, dry
8.6-10.0'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, dry
12.0-14.4'	SAA
16.0-19.0'	SAA
20.0-22.0'	Orange/Light brown, coarse-to-fine sand, little fine-to-medium gravel, moist
VS-45-13	
0.0-2.3'	Dark brown, fine-to-medium sand, little fine-to-medium gravel, trace silt, moist
4.0-4.9'	SAA
4.9-6.4'	Orange/brown, fine-to-coarse sand, little fine-to-medium gravel, dry
8.0-11.1'	SAA
12.0-15.0'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, moist
16.0-16.6'	SAA
20.0-22.0'	SAA
VS-45-14	
0.0-0.9'	Brown, fine-to-medium sand, little fine-to-medium gravel, trace silt, moist
4.0-4.7'	SAA
4.7-6.4'	Light brown/orange, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, dry
8.0-10.0'	SAA
12.0-14.7'	SAA
16.0-19.0'	Orange, fine-to-medium sand, little fine-to-medium gravel, dry
20.0-20.5'	SAA
20.5-23.2'	Orange, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, dry
VS-45-15	
0.0-1.0'	Brown, fine-to-medium sand, little fine-to-medium gravel, trace silt, moist
4.0-4.7'	SAA
4.7-6.4'	Light brown/orange, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, dry
8.0-11.8'	Light brown, fine-to-medium sand, trace fine gravel, moist
12.0-14.3'	Orange/brown, fine-to-medium sand, trace fine gravel, moist
16.0-18.8'	Light brown/orange, fine-to-coarse sand, trace fine-to-medium gravel, dry
20.0-22.5'	Orange, fine-to-medium sand, trace coarse sand & fine gravel, dry
VS-45-16	
0.0-1.0'	Brown, fine-to-medium sand, little silt & fine-to-medium gravel, moist
4.0-5.9'	SAA, strong odor
5.9-6.7'	Orange, fine-to-coarse sand, little fine-to-medium gravel, dry
8.0-10.5'	SAA
12.0-14.6'	Orange, fine-to-medium sand, some fine-to-medium gravel, trace coarse sand, dry
16.0-19.0'	SAA
20.0-22.0'	Orange, fine-to-coarse sand, some fine-to-coarse gravel, dry
VS-45-17	
0.0-2.0'	Brown, fine-to-medium sand, some silt, little fine-to-medium gravel, moist
4.0-6.0'	SAA, strong odor
6.0-6.7'	Orange, fine-to-coarse sand, little fine-to-medium gravel, dry
8.0-10.4'	SAA
12.0-14.4'	Orange/light brown, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, dry
16.0-18.7'	SAA
20.0-21.0'	SAA, moist

TABLE 3
SOIL SAMPLE VISUAL CHARACTERIZATION RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID/ Depth Interval	Description
VS-45-18	
0.0-2.4'	Dark brown, fine-to-medium sand, some silt & fine-to-medium gravel, moist
4.0-4.9'	SAA, slight odor
4.9-6.2'	Orange/light brown, fine-to-coarse sand, trace fine-to-medium gravel, dry
8.0-9.0'	Light brown, fine-to-medium sand, little fine-to-medium gravel, moist
9.0-10.0'	Orange/brown, fine-to-medium sand, little fine-to-medium gravel, moist
12.0-13.4'	SAA
16.0-19.0'	Light brown/orange, fine-to-medium sand, little fine-to-medium gravel, dry
20.0-22.0'	SAA
VS-45-19	
0.0-2.4'	Brown, fine-to-medium sand, little silt & fine-to-medium gravel, moist, slight odor
4.0-4.8'	SAA, strong odor
4.8-7.0'	Orange/light brown, fine-to-coarse sand, some fine-to-medium gravel, dry
8.0-11.4'	SAA
12.0-15.1'	Orange/light brown, fine-to-medium sand, little fine-to-medium gravel, trace coarse sand, dry
16.0-18.6'	SAA
20.0-21.0'	SAA
VS-45-20	
0.0-7.0'	Dark brown, fine-to-medium sand, some coarse gravel, little fine gravel, moist
7.0-8.0'	Light brown, fine-to-medium sand, some fine gravel, trace coarse sand, moist
8.0-22.0'	Reddish brown, fine-to-medium sand, some fine gravel, trace coarse gravel,moist
VS-45-21	
0.0-7.0'	Dark brown, fine-to-medium sand, some coarse gravel, little fine gravel, moist
7.0-8.0'	Light brown, fine-to-medium sand, some fine gravel, trace coarse gravel
8.0-22.0'	Reddish brown, fine-to-medium sand, some fine gravel, trace coarse gravel,moist
VS-45-22	
0.0-3.0'	Dark brown, fine-to-medium sand, some coarse-to-fine gravel, moist
3.0-3.5'	Dark to Grey, clayey silt, little coarse gravel, trace fine gravel, moist
3.5-7.0'	Dark brown, clayey silt, some fine gravel, wet
7.0-8.0'	Light brown, fine-to-medium sand, some coarse gravel, little fine gravel, moist
8.0-9.0'	Dark brown, clayey silt, some fine gravel, moist
9.0-12.0'	Light brown, fine-to-medium sand, some coarse gravel, little fine gravel, moist
12.0-22.0'	Light brown, fine-to-medium sand, some fine gravel, trace coarse gravel, moist
VS-45-23	
0.0-11.0'	Light brown, fine-to-medium sand, trace fine gravel, trace coarse gravel, moist
11.0-14.0'	Reddish brown, fine-to-medium sand, some fine gravel, trace coarse sand, moist
14.0-20.0'	Reddish brown, fine-to-medium sand, trace fine gravel, trace coarse gravel, moist
UST-AOC-50	
0.0-2.5'	Dark brown, fine-to-medium sand, little fine-to-medium gravel, moist

Notes:

1. Interim Corrective Measure (ICM) soil samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June and August 2005.
2. SAA = Same as above.
3. Characterization activities were conducted by James J. Boland and/or Andrew S. Amell of BBL.
4. The 'R' included in selected sample IDs indicates the sample was collected from a revisited sampling location.
5. Depths reported above are relative to the bottom of the concrete slab (for sampling locations within the former Pilot Plant footprint) and the surrounding grade (for all other sampling locations).

TABLE 4
DELINEATION/VERIFICATION SOIL ANALYTICAL RESULTS FOR PCBs (ppm)

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Sample Depth Relative to Surrounding Grade	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
AOC 39 - Former Plant 1 Electrical Transformer Area									
VS-39-1 (0.0-0.2')*	(0.0-0.2')	<0.38	<0.73	<0.38	<0.38	0.58	<0.38	1.9	2.5
VS-39-1 (0.5-1.5')*	(0.5-1.5')	<0.019	<0.037	<0.019	<0.019	0.022 J	<0.019	0.11	0.13 J
VS-39-2 (2.5-3.5')*	(2.5-3.5')	<0.018	<0.035	<0.018	<0.018	0.012 J	<0.018	0.078	0.09 J
VS-39-3 (2.5-3.5')*	(2.5-3.5')	<0.017	<0.034	<0.017	<0.017	0.03	<0.017	0.18	0.21
VS-39-4 (0.0-0.2')*	(0.0-0.2')	<0.37	<0.72	<0.37	<0.37	<0.37	<0.37	3.9	3.9
VS-39-4 (0.5-1.5')*	(0.5-1.5')	<0.02	<0.039	<0.02	<0.02	<0.02	<0.02	0.26	0.26 J
VS-DUP-1 [VS-39-4 (0.5-1.5')]*	(0.5-1.5')	<0.019	<0.038	<0.019	<0.019	0.015 J	<0.019	0.26	0.28 J
VS-39-4 (2.5-3.5')*	(2.5-3.5')	<0.017	<0.034	<0.017	<0.017	<0.017	<0.017	0.054	0.054
VS-39-5 (0.0-0.2')*	(0.0-0.2')	<0.18	<0.35	<0.18	<0.18	0.19	<0.18	0.87	1.1
VS-39-5 (0.5-1.5')*	(0.5-1.5')	<0.02	<0.039	<0.02	<0.02	0.0058 J	<0.02	0.026	0.032 J
AOC 45 - Sump in Northwest Corner of Pilot Plant									
VS-45-1 (6.8-7.3')*	(4.5-5.0')	<3.5	<6.7	<3.5	<3.5	46	25 J	<3.5	71 J
VS-45-1 (8.8-9.8')*	(6.5-7.5')	<0.87	<1.7	<0.87	<0.87	4.6	2.7	<0.87	7.3
VS-DUP-2 [VS-45-1 (8.8-9.8')]*	(6.5-7.5')	<0.87	<1.7	<0.87	<0.87	7.3	4.5	<0.87	11.8
VS-45-2R (0.0-0.5')	(2.3-1.8' Above)	<0.36	<0.71	<0.36	<0.36	5.3	<0.36	<0.36	5.3
VS-45-2R (0.5-2.0')	(1.8-0.3' Above)	<3.8	<7.4	<3.8	<3.8	28	<3.8	<3.8	28
VS-45-2R (4.0-6.0')	(1.7-3.7')	<99	<190	<99	<99	830	<99	<99	830
VS-45-2 (6.8-7.3')*	(4.5-5.0')	<170	<340	<170	<170	2,000	<170	<170	2,000
VS-45-2R (6.8-7.3')	(4.5-5.0')	<170	<330	<170	<170	660	<170	<170	660
VS-45-2 (8.8-9.8')*	(6.5-7.5')	<350	<680	<350	<350	5,500	<350	<350	5,500
VS-45-2R (8.8-9.8')	(6.5-7.5')	<180	<340	<180	<180	1,800	<180	<180	1,800
VS-45-2R (10.3-12.3')	(8.0-10.0')	<360	<690	<360	<360	4,100	<360	<360	4,100
VS-45 2R (12.3-14.3')	(10.0-12.0')	<170	<330	<170	<170	2,300	<170	<170	2,300
VS-45-2R (14.3-16.0')	(12.0-13.7')	<700	<1,400	<700	<700	2,400	<700	<700	2,400
VS-45-2R (16.0-18.0')*	(13.7-15.7')	<360	<700	<360	<360	3,700	<360	<360	3,700
VS-DUP-4 [VS-45-2R (16.0-18.0')]*	(13.7-15.7')	<880	<1,700	<880	<880	5,400	<880	<880	5,400
VS-45-2R (22.0-24.0')*	(19.7-21.7')	<170	<340	<170	<170	590	<170	<170	590
VS-45-2 (26.0-28.0')	(23.7-25.7')	<8.8	<17	<8.8	<8.8	91	<8.8	<8.8	91
VS-45-2 (30.0-32.0')*	(27.7-29.7')	<0.17	<0.34	<0.17	<0.17	1.0	<0.17	<0.17	1.0
VS-45-2 (34.0-36.0')*	(31.7-33.7')	<3.4	<6.7	<3.4	<3.4	26	<3.4	<3.4	26
VS-45-DUP-1 [VS-45-2 (34.0-36.0')]*	(31.7-33.7')	<3.5	<6.8	<3.5	<3.5	48	<3.5	<3.5	48
VS-45-2 (40.0-42.0')*	(37.7-39.7')	<1.8	<3.5	<1.8	<1.8	7.4	<1.8	<1.8	7.4
VS-45-2 (44.0-46.0')*	(41.7-43.7')	<0.9	<1.8	<0.9	<0.9	6.0	<0.9	<0.9	6.0
VS-45-2 (50.0-52.0')*	(47.7-49.7')	<0.019	<0.036	<0.019	<0.019	0.028 J	<0.019	<0.019	0.028 J
VS-45-3 (4.5-5.0')*	(4.5-5.0')	<0.036	<0.069	<0.036	<0.036	0.31	0.2 J	<0.036	0.51 J
VS-45-3 (6.5-7.5')*	(6.5-7.5')	<0.017	<0.034	<0.017	<0.017	0.061 NJ	0.14 J	<0.017	0.20 J
VS-45-4 (4.5-5.0')*	(4.5-5.0')	<1.9	<3.6	<1.9	<1.9	28	17	<1.9	45
VS-45-4 (6.5-7.5')*	(6.5-7.5')	<0.87	<1.7	<0.87	<0.87	7.9	3.6 J	<0.87	12 J
VS-45-5 (4.5-5.0')*	(4.5-5.0')	<0.88	<1.7	<0.88	<0.88	3.7	2	<0.88	5.7
VS-45-5 (6.5-7.5')*	(6.5-7.5')	<0.035	<0.068	<0.035	<0.035	0.28	0.22	<0.035	0.50
VS-45-6 (4.5-5.0')*	(4.5-5.0')	<0.017	<0.034	<0.017	<0.017	0.08	0.077	<0.017	0.16
VS-45-6 (6.5-7.5')*	(6.5-7.5')	<0.018	<0.034	<0.018	<0.018	0.057	0.038	<0.018	0.095
VS-45-7R (0.0-0.5')*	(2.3-2.8' Above)	<3.9	<7.6	<3.9	<3.9	22 J	<3.9	<3.9	22 J
VS-45-7 (6.8-7.3')*	(4.5-5.0')	<870	<1,700	<870	<870	6,000	3,300 J	<870	9,300 J
VS-45-7 (8.8-9.8')*	(6.5-7.5')	<860	<1,700	<860	<860	8,800	5,200 J	<860	14,000 J
VS-45-7R (10.3-12.3')*	(8.0-10.0')	<350	<670	<350	<350	3,600	<350	<350	3,600
VS-45-7R (12.3-14.3')*	(10.0-12.0')	<870	<1,700	<870	<870	8,500	<870	<870	8,500
VS-45-7R (14.3-16.0')*	(12.0-13.7')	<870	<1,700	<870	<870	7,200	<870	<870	7,200
VS-45-7R (22.0-24.0')*	(19.7-21.7')	<0.88	<1.7	<0.88	<0.88	4.1	<0.88	<0.88	4.1
VS-45-8 (4.5-5.0')*	(4.5-5.0')	<0.018	<0.034	<0.018	<0.018	0.031	0.022	<0.018	0.053
VS-45-8 (6.5-7.5')*	(6.5-7.5')	<0.35	<0.68	<0.35	<0.35	1.0	<0.35	<0.35	1.0
VS-45-9 (4.5-5.0')*	(4.5-5.0')	<0.018	<0.034	<0.018	<0.018	0.23	0.2	<0.018	0.43
VS-45-9 (6.5-7.5')*	(6.5-7.5')	<0.018	<0.034	<0.018	<0.018	<0.036	0.07	<0.018	0.07
VS-45-10 (4.5-5.0')*	(4.5-5.0')	<0.87	<1.7	<0.87	<0.87	2.6	0.89 J	<0.87	3.5 J
VS-45-10 (6.5-7.5')*	(6.5-7.5')	<0.35	<0.67	<0.35	<0.35	1.3	0.58 J	<0.35	1.9 J
VS-45-11 (0.0-0.5')	(2.3-1.8' Above)	<96	<190	<96	<96	290	<96	<96	290
VS-45-11 (2.0-4.0')	(0.3 Above-1.7' Below)	<9.8	<19	<9.8	<9.8	58	<9.8	<9.8	58
VS-45-11 (6.8-7.3')	(4.5-5.0')	<180	<350	<180	<180	2,200	<180	<180	2,200
VS-45-11 (8.8-9.8')	(6.5-7.5')	<170	<330	<170	<170	1,100	<170	<170	1,100
VS-45-11 (10.3-12.3')	(8.0-10.0')	<170	<340	<170	<170	700	<170	<170	700
VS-DUP-3 [VS-45-11 (10.3-12.3')]	(8.0-10.0')	<170	<340	<170	<170	830.00	<170	<170	830
VS-45-11 (12.3-14.3')	(10.0-12.0')	<170	<330	<170	<170	680	<170	<170	680
VS-45-11 (14.3-16.0')	(12.0-13.7')	<680	<1,300	<680	<680	4,000	<680	<680	4,000
VS-45-11R (16.0-18.0')*	(13.7-15.7')	<170	<330	<170	<170	1,500	<170	<170	1,500
VS-45-11R (22.0-24.0')*	(29.7-21.7')	<3.5	<6.8	<3.5	<3.5	23	<3.5	<3.5	23
VS-45-12 (0.0-0.5')*	(2.3-1.8' Above)	<0.93	<1.8	<0.93	<0.93	4.4	<0.93	<0.93	4.4
VS-45-12 (6.8-7.3')*	(4.5-5.0')	<0.089	<0.17	<0.089	<0.089	0.56	<0.089	<0.089	0.56
VS-45-12 (10.3-12.3')*	(8.0-10.0')	<0.017	<0.034	<0.017	<0.017	0.14	<0.017	<0.017	0.14
VS-45-12 (16.0-18.0')*	(13.7-15.7')	<0.017	<0.034	<0.017	<0.017	0.16	0.071 JN	<0.017	0.23 J
VS-45-13 (0.0-0.5')*	(2.3-1.8' Above)	<0.019	<0.037	<0.019	<0.019	0.16	0.16	<0.019	0.32
VS-45-13 (6.8-7.3')*	(4.5-5.0')	<0.017	<0.033	<0.017	<0.017	0.048	<0.017	<0.017	0.048
VS-45-13 (10.3-12.3')*	(8.0-10.0')	<0.017	<0.033	<0.017	<0.017	0.042	<0.017	<0.017	0.042
VS-45-13 (16.0-18.0')*	(13.7-15.7')	<0.034	<0.066	<0.034	<0.034	0.44	0.23 J	<0.034	0.67 J

TABLE 4
DELINEATION/VERIFICATION SOIL ANALYTICAL RESULTS FOR PCBs (ppm)

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Sample Depth Relative to Surrounding Grade	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
AOC 45 - Sump in Northwest Corner of Pilot Plant (Continued)									
VS-45-14 (0.0-0.5')*	(2.3-1.8' Above)	<0.019	<0.038	<0.019	<0.019	0.14	0.16	<0.019	0.30
VS-DUP-5 [VS-45-14 (0.0-0.5')]*	(2.3-1.8' Above)	<0.019	<0.037	<0.019	<0.019	0.20	0.14 J	<0.019	0.34 J
VS-45-14 (6.8-7.3')*	(4.5-5.0')	<0.017	<0.033	<0.017	<0.017	0.024	<0.017	<0.017	0.024
VS-45-14 (10.3-12.3')*	(8.0-10.0')	<0.017	<0.033	<0.017	<0.017	0.11	0.071 J	<0.017	0.18 J
VS-45-14 (16.0-18.0')*	(13.7-15.7')	<0.017	<0.033	<0.017	<0.017	0.035	<0.017	<0.017	0.035
VS-45-20 (0.0-0.5')*	(2.3-1.8' Above)	<0.019	<0.037	<0.019	<0.019	0.079	0.097 J	<0.019	0.18 J
VS-45-20 (6.8-7.3')*	(4.5-5.0')	<0.88	<1.7	<0.88	<0.88	2.4	1.9 JN	<0.88	4.3 J
VS-45-20 (10.0-12.0')*	(7.7-9.7')	<34	<66	<34	<34	110	<34	<34	110
VS-45-20 (16.0-18.0')*	(13.7-15.7')	<340	<660	<340	<340	1,100	<340	<340	1,100
VS-45-20 (20.0-22.0')	(17.7-19.7')	<35	<68	<35	<35	320	<35	<35	320
VS-45-21 (0.0-0.5')*	(2.3-1.8' Above)	<0.19	<0.36	<0.19	<0.19	0.57	0.72	<0.19	1.3
VS-45-21 (6.8-7.3')*	(4.5-5.0')	<0.18	<0.36	<0.18	<0.18	0.99	1.3	<0.18	2.3
VS-45-21 (10.0-12.0')*	(7.7-9.7')	<0.36	<0.69	<0.36	<0.36	1.3	1.6	<0.36	2.9
VS-45-21 (16.0-18.0')*	(13.7-15.7')	<0.017	<0.034	<0.017	<0.017	0.095	<0.017	<0.017	0.095
VS-45-22 (0.0-0.5')*	(2.3-1.8' Above)	<0.095	<0.18	<0.095	<0.095	0.22	0.31	<0.095	0.53
VS-45-22 (6.8-7.3')*	(4.5-5.0')	<0.37	<0.71	<0.37	<0.37	1.6	2.2	<0.37	3.8
VS-45-DUP-2 [VS-45-22 (6.8-7.3')]*	(4.5-5.0')	<0.38	<0.74	<0.38	<0.38	1.9	2.5	<0.38	4.4
VS-45-22 (10.0-12.0')*	(7.7-9.7')	<0.017	<0.034	<0.017	<0.017	0.094	0.12	<0.017	0.21
VS-45-22 (16.0-18.0')*	(13.7-15.7')	<0.087	<0.17	<0.087	<0.087	0.36	0.58	<0.087	0.94
VS-45-23 (4.5-5.0')*	(4.5-5.0')	<0.17	<0.34	<0.17	<0.17	0.74	0.71 J	<0.17	1.5 J
VS-45-DUP-3 [VS-45-23 (4.5-5.0')]*	(4.5-5.0')	<0.17	<0.33	<0.17	<0.17	1.0	1.1	<0.17	2.1
VS-45-23 (6.5-7.5')*	(6.5-7.5')	<0.086	<0.17	<0.086	<0.086	0.49	0.5 J	<0.086	0.99 J
AOC 50 - Former 1,000-Gallon Gasoline Underground Storage Tank									
UST-AOC-50*	(0.0-2.5')	<0.089	<0.17	<0.089	<0.089	0.37	0.7	<0.089	1.1

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June and August 2005.
2. Samples were analyzed for polychlorinated biphenyls (PCBs) by Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut using United States Environmental Protection Agency (USEPA) SW-846 Method 8082, as referenced in the New York State Department of Environmental Conservation (NYSDEC) 2000 Analytical Service Protocol (ASP).
3. Depths identified in the sample ID for samples collected outside the former Pilot Plant footprint (at sampling locations VS-45-3, VS-45-4, VS-45-5, VS-45-6, VS-45-8, VS-45-9, and VS-45-10) are relative to the surrounding ground surface. Depths identified in the sample ID for samples collected within the former Pilot Plant footprint (at sampling locations VS-45-1, VS-45-2, VS-45-2R, VS-45-7, and VS-45-11) are relative to the top of the soil surface beneath the floor slab, which is approximately 2.3 feet higher than the surrounding ground surface.
4. The 'R' included in selected sample IDs indicates the sample was collected from a revisited sampling location.
5. Concentrations presented in parts per million (ppm), which is equivalent to milligrams per kilogram (mg/kg).
6. Data qualifiers indicate the following:
   < = Aroclors were not detected at a concentration exceeding the presented laboratory detection limit.
   J = Estimated result. Result is less than the laboratory detection limit.
7. DUP = Blind Duplicate [corresponding sampling location is indicated in brackets].
8. Shaded values indicate that the total PCB concentration exceeds the 50 ppm action level established for the interim corrective measure.
9. An asterisk (*) following the sample ID indicates that analytical results for the sample have been validated by BBL.

TABLE 5
VERIFICATION SOIL ANALYTICAL RESULTS FOR DETECTED VOCs (ppm)

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Constituent	TAGM 4046 Guidance Values	VS-39-1R (2.5-4.0')	VS-45-9R (8.0-10.0')
Acetone	0.2	0.0042 J	0.0065 J
Methylene Chloride	0.1	0.0051 J	0.0054 J

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June 2005.
2. Reported sample depths are relative to the surrounding ground surface.
3. Samples were analyzed for volatile organic compounds (VOCs) by Severn Trent Laboratories, Inc. (STL) of Shelton, Conneticut using United States Environmental Protection Agency (USEPA) SW-846 Method 8260B, as referenced in the New York State Department of Environmental Conservation (NYSDEC) 2000 Analytical Services Protocol (ASP).
4. Concentrations presented in parts per million (ppm), which is equivalent to milligrams per kilogram (mg/kg).
5. J = Estimated result. Result is less than the laboratory detection limit.
6. Soil Guidance Values are from the NYSDEC Technical and Administrative Guidance Memorandum (TAGM) titled "Determination of Soil Cleanup Objectives and Cleanup Levels", HWR-94-4046 (TAGM 4046) dated January 24, 1994.
7. Analytical results have not been validated.

TABLE 6
WASTEWATER ANALYTICAL RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Constituent	Waste Characterization Regulatory Limits	AOC-50 UST WATER
PCBs (ppm)		
Aroclor 1016	NA	<0.0005
Aroclor 1221	NA	<0.001
Aroclor 1232	NA	<0.0005
Aroclor 1242	NA	<0.0005
Aroclor 1248	NA	0.0014
Aroclor 1254	NA	0.0011
Aroclor 1260	NA	<0.0005
Total PCBs	50	0.0025
TCLP VOCs (ppm)		
1,1-Dichloroethene	0.7	<0.05
1,2-Dichloroethane	0.5	0.85
2-Butanone	200	0.12
Benzene	0.5	0.24
Carbon tetrachloride	0.5	<0.05
Chlorobenzene	100	<0.05
Chloroform	6	<0.05
Tetrachloroethene	0.5	<0.05
Trichloroethene	0.5	<0.05
Vinyl chloride	0.2	<0.05
TCLP SVOCs (ppm)		
1,4-Dichlorobenzene	7.5	<0.20
2,4,5-Trichlorophenol	400	<1.0
2,4,6-Trichlorophenol	2	<0.20
2,4-Dinitrotoluene	0.13	<0.20
2-Methylphenol	200	0.47
4-Methylphenol	200	<0.20
Hexachlorobenzene	0.13	<0.20
Hexachlorobutadiene	0.5	<0.20
Hexachloroethane	3	<0.20
Nitrobenzene	2	0.017 J
Pentachlorophenol	100	<1.0
Pyridine	5	<0.40
TCLP Metals (ppm)		
Arsenic	5	0.0204 B
Barium	100	0.14
Cadmium	1	<0.050
Chromium	5	<0.050
Lead	5	<0.050
Mercury	0.2	<0.01
Selenium	1	<0.150
Silver	5	<0.030
Corrosivity, Ignitability, and Reactivity		
Corrosivity (Std. Units)	*	7.72
Ignitability (deg F)	-	-
Reactive Cyanide (ppm)	**	<0.5
Reactive Sulfide (ppm)	**	<20

TABLE 6
WASTEWATER ANALYTICAL RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June 2005.
2. Samples were analyzed by Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut for the following constituents:
   - VOCs using United States Environmental Protection Agency (USEPA) SW-846 Method 8260B;
   - Metals using USEPA SW-846 Method 6010;
   - Corrosivity using USEPA SW-846 Method 9045C;
   - Ignitability using USEPA SW-846 Method 1010;
   - Reactive Cyanide using USEPA SW-846 Method 7.3.3; and
   - Reactive Sulfide using USEPA SW-846 Method 7.3.4.
3. deg F = Degrees Fahrenheit.
4. Std. Units = Standard Units.
5. ppm = Parts per million.
6. Data qualifers indicate the following:
   B = Result is less than the Contract Required Detection Limits/Reporting Limit (CRDL/RL), but greater than or equal to the Instrument Detection Limits/Method Detection Limit (IDL/MDL).
   J = Estimated result. Result is less than the laboratory detection limit.
7. < = Constituent was not detected at a concentration exceeding the presented laboratory detection limit.
8. * = Sample is corrosive if pH is less than or equal to 2 standard units, or greater than or equal to 12.5 standard units.
9. - = Sample which does not ignite or support combustion, therefore under these conditions the sample is non-reactive.
10. ** = Sample which does not exceed the USEPA action levels of 250 mg HCN/kg waste and 500 mg H_2S/ kg waste is not reactive.
11. Regulatory limits for characteristic hazardous waste are from the following sources:
    - Corrosivity - 40 CFR 261.22;
    - Ignitability - 40 CFR 261.21;
    - Reactivity - In accordance with an April 2, 1998 memorandum from the USEPA's Office of Solid Waste and Emergency Response (OSWER), the USEPA has withdrawn the guidance levels for evaluating potentially reactive cyanide-bearing and sulfide-bearing wastes (i.e. 250 ppm and 500 ppm, respectively);
    - PCBs - Regulated by New York State in accordance with 6NYCRR Part 371.4(e); and
    - TCLP VOCs, TCLP SVOCs, and TCLP Metals - 40 CFR 261.24
12. NA = No regulatory limit is listed for this constituent.
13. Shading indicates the concentration exceeds the waste characterization regulatory limit.
14. Analytical results have not been validated.

TABLE 7
SOIL AND DEBRIS WASTE CHARACTERIZATION ANALYTICAL RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Constituent	Waste Characterization Regulatory Limits	WC-50-UST Contents	AOC-39 Staged Soil	Structure Cleaning Debris
PCBs (ppm)				
Aroclor 1016	NA	<0.18	<0.096	<2
Aroclor 1221	NA	<0.35	<0.19	<4
Aroclor 1232	NA	<0.18	<0.096	<2
Aroclor 1242	NA	<0.18	<0.096	<2
Aroclor 1248	NA	0.87	0.18	17
Aroclor 1254	NA	<0.18	0.24	12
Aroclor 1260	NA	<0.18	0.52	2.2
Total PCBs	50	0.87	0.94	(31)
TCLP VOCs (ppm)				
1,1-Dichloroethene	0.7	<0.005	<0.005	<0.005
1,2-Dichloroethane	0.5	<0.005	<0.005	<0.005
2-Butanone	200	<0.01	<0.01	<0.01
Benzene	0.5	<0.005	<0.005	<0.005
Carbon tetrachloride	0.5	<0.005	<0.005	<0.005
Chlorobenzene	100	<0.005	<0.005	<0.005
Chloroform	6	<0.005	0.001 J	0.00084 J
Tetrachloroethene	0.5	<0.005	<0.005	<0.005
Trichloroethene	0.5	<0.005	<0.005	<0.005
Vinyl chloride	0.2	<0.005	<0.005	<0.005
TCLP SVOCs (ppm)				
1,4-Dichlorobenzene	7.5	<0.02	<0.02	<0.02
2,4,5-Trichlorophenol	400	<0.1	<0.1	<0.1
2,4,6-Trichlorophenol	2	<0.02	<0.02	<0.02
2,4-Dinitrotoluene	0.13	<0.02	<0.02	<0.02
2-Methylphenol	200	<0.02	<0.02	<0.02
4-Methylphenol	200	<0.02	<0.02	<0.02
Hexachlorobenzene	0.13	<0.02	<0.02	<0.02
Hexachlorobutadiene	0.5	<0.02	<0.02	<0.02
Hexachloroethane	3	<0.02	<0.02	<0.02
Nitrobenzene	2	<0.02	<0.02	<0.02
Pentachlorophenol	100	<0.1	<0.1	<0.1
Pyridine	5	<0.04	<0.04	<0.04
TCLP Metals (ppm)				
Arsenic	5	<0.2	<0.2	<0.2
Barium	100	0.0781	0.395	0.698
Cadmium	1	<0.05	<0.05	0.0079 B
Chromium	5	<0.05	<0.05	<0.05
Lead	5	<0.05	<0.05	0.0212 B
Mercury	0.2	<0.01	<0.01	<0.01
Selenium	1	0.0261 B	<0.150	<0.150
Silver	5	<0.03	<0.03	<0.03
Corrosivity, Ignitability, and Reactivity				
Corrosivity (Std. Units)	*	7.69	6.32	7.86
Ignitability (deg F)	-	-	-	-
Reactive Cyanide (ppm)	**	<0.5	<0.5	<0.5
Reactive Sulfide (ppm)	**	<20	<20	<20

See Notes on Page 2.

TABLE 7
SOIL AND DEBRIS WASTE CHARACTERIZATION ANALYTICAL RESULTS

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June 2005.
2. Samples were analyzed by Severn Trent Laboratories, Inc. (STL) of Shelton, Conneticut.
3. Samples were submitted for laboratory analysis of the following constituents:
   - Polychlorinated biphenyls (PCBs) using United States Environmental Protection Agency (USEPA) SW-846 Method 8082;
   - TCLP VOCs using USEPA SW-846 Method 8260B;
   - TCLP Semi-volatile organic compounds (SVOCs) using USEPA SW-846 Method 8270C;
   - TCLP Metals using USEPA SW-846 Method 6010;
   - Corrosivity using USEPA SW-846 Method 9045C;
   - Ignitability using USEPA SW-846 Method 1010;
   - Reactive Cyanide using USEPA SW-846 Method 7.3.3; and
   - Reactive Sulfide using USEPA SW-846 Method 7.3.4.
4. -- = Analysis was not conducted on this sample for this constituent.
5. deg F = Degrees Fahrenheit.
6. Std. Units = Standard Units.
7. ppm = Parts per million, which is equivalent to milligrams per kilogram (mg/kg).
8. Data qualifers indicate the following:
   B = Result is less than the Contract Required Detection Limits/Reporting Limit (CRDL/RL), but greater than or equal to the Instrument Detection Limits/Method Detection Limit (IDL/MDL).
   J = Estimated result. Result is less than the laboratory detection limit.
9. < = Constituent was not detected at a concentration exceeding the presented laboratory detection limit.
10. * = Sample is corrosive if pH is less than or equal to 2 standard units, or greater than or equal to 12.5 standard units.
11. - = Sample which does not ignite or support combustion, therefore under these conditions the sample is non-reactive.
12. ** = Sample which does not exceed the USEPA action levels of 250 mg HCN/kg waste and 500 mg H_2S/ kg waste is not reactive.
13. Regulatory limits for characteristic hazardous waste are from the following sources:
   - Corrosivity - 40 CFR 261.22;
   - Ignitability - 40 CFR 261.21;
   - Reactivity - In accordance with an April 2, 1998 memorandum from the USEPA's Office of Solid Waste and Emergency Response (OSWER), the USEPA has withdrawn the guidance levels for evaluating potentially reactive cyanide-bearing and sulfide-bearing wastes (i.e. 250 ppm and 500 ppm, respectively);
   - PCBs - Regulated by New York State in accordance with 6NYCRR Part 371.4(e); and
   - TCLP VOCs, TCLP SVOCs, and TCLP Metals - 40 CFR 261.24.
14. NA = No regulatory limit is listed for this constituent.
15. Analytical results have not been validated.

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BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SWMU/AOC Number	Area	Location	Findings	Proposed Action
General Note: Shading below designates Areas of Concern (AOCs) to be identified in Site Management Plan (SMP)				
1	Plant 1	Less than 90 day storage unit	Concrete at sampling location AOC 1-1 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling location AOC 1-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil at this location. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Arsenic in soil to be identified in SMP.
2	Plant 1	Laboratory satellite accumulation area walkway connecting Plant 1 and Warehouse	Soil at sampling locations AOC 2-1 through AOC 2-4 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. One or more SVOCs were identified at each sampling location at concentrations slightly above the guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
3	Plant 1	Wastewater Tanks 1, 11A, and 11B	Concrete at sampling locations AOC 3-1 and AOC 3-2 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. With one minor exception, soil at sampling locations AOC 3-3 and AOC 3-4 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values: One VOC (acetone) was identified in sample AOC 3-3 at an estimated concentration of 0.38 ppm, which is slightly above the 0.2 ppm guidance value. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Arsenic in soil (location AOC 3-3) to be identified in SMP.
4	Plant 1	Former liquid incinerator area	Concrete at sampling location AOC 4-1 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Ethylene glycol and propylene glycol were identified in the TCLP sample extract at concentrations of 37.5 ppm and 19 ppm, respectively. Soil at sampling location AOC 4-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values. Glycols were not detected in soil within this AOC.	Mercury and zinc in soil to be identified in SMP.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
5	Plant 1	Transfer station & associated piping	Soil at sampling locations AOC 5-1 and AOC 5-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at both locations at concentrations above TAGM 4046 soil guidance values, but the concentrations at location AOC 5-2 were only slightly above the guidance values.	SVOCs in soil to be identified in SMP.
6	Plant 1 Transfer Station	Glycol tanks 29 & 30	Soil at sampling location AOC 6-1 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. Three SVOCs were identified at estimated concentrations slightly above the TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
7	Plant 1 Transfer Station	Adipic acid silos & wastewater area	Soil at sampling locations AOC 7-1 and AOC 7-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at location AOC 7-2 at concentrations slightly above the guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	SVOCs and zinc in soil (at location AOC 7-2) to be identified in SMP.
8	Plant 1	Underground storage tank (UST)	Soil at sampling locations AOC 8-1 and AOC 8-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values.	No further action.
9	Plant 1	UST	Soil at sampling locations AOC 9-1 and AOC 9-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values.	No further action.
10	Plant 2	UST	With one minor exception, soil at sampling locations AOC 10-1 and AOC 10-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. One SVOC (benzo(a)pyrene) was identified in sample AOC 10-1 at an estimated concentration of 0.12 ppm, which is slightly above the 0.061 ppm guidance value.	Benzo(a)pryene in soil (at location AOC 10-1) to be identified in SMP.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
11	Plant 1	Boiler condensate run-off	Impacted debris in AOC 11 was removed as part of the interim corrective measure (ICM) Surface soil at sampling locations AOC 11-1, AOC 11-2, and AOC 11-4 exhibit PCBs at concentrations of 28 ppm, 47 ppm, and 1.3 ppm, which are above the 1 ppm TAGM 4046 surface soil guidance value. PCBs were identified at an estimated concentration of 0.33 ppm at sampling location AOC 11-3. VOCs were not identified in soil within this AOC at concentrations above the TAGM 4046 soil guidance values. Soil at sampling locations AOC 11-1 exhibits SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	PCBs in soil to be identified in SMP.
12	Plant 2	Waste accumulation area	With one minor exception, soil at sampling location AOC 12-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values: One VOC (acetone) was identified at an estimated concentration of 0.21 ppm, which is slightly above the 0.2 ppm guidance value. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
13	Plant 2	Former RCRA greater than 90 day storage area	With one minor exception, soil at sampling location AOC 13-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values: One SVOC (phenol) was identified at an estimated concentration of 0.2 ppm, which is slightly above the 0.03 ppm guidance value. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Phenol in soil to be identified in SMP.
14	Plant 2	Waste compactor and scrap metal area	Concrete at sampling location AOC 14-1 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals.	No further action.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
15	Plant 2	Distillate wastewater tank 2	Concrete at sampling location AOC 15-2 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling location AOC 15-3 does not exhibit PCBs, VOCs, or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Lead in soil to be identified in SMP.
16	Plant 2	Reactor 4 knockout pot	Concrete at sampling location AOC 16-1 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. With two minor exceptions, soil at sampling location AOC 16-2 does not exhibit PCBs, VOCs, or SVOCs at concentrations above TAGM 4046 soil guidance values. Two SVOCs (benzo(a)pyrene and dibenzo(a,h)anthracene) were identified at estimated concentrations of 0.16 ppm and 0.074 ppm, respectively, which are slightly above the corresponding guidance values of 0.061 and 0.014 ppm respectively. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Benzo(a)pyrene and dibenzo(a,h)anthracene in soil to be identified in SMP.
17	Plant 2	Dimethylformamide pump overflow	Soil at sampling location AOC 17-1 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. Four SVOCs were identified at sampling location AOC 17-1 at estimated concentrations slightly above the TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
18	Plant 2 Transfer Station	Plant 2 hexandiol tank	Soil at sampling locations AOC 18-1, AOC 18-2, and AOC 18-3 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at concentrations above the guidance values at sampling locations AOC 18-1 and 18-3. However, the SVOC concentrations at sampling location AOC 18-3 were only slightly above the guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil (at locations AOC 18-1 and AOC 18-3) to be identified in SMP).
19	Plant 2	Fume incinerator	NYSDEC previously approved no further action for this AOC.	No further action.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
20	Plant 3 Warehouse	RCRA less than 90 day storage unit	Concrete at sampling location AOC 20-1 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling location AOC 20-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
21A	Plant 3 Transfer Station	Adipic acid silos	Soil at sampling locations AOC 21A-1 and AOC 21A-2 do not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	No further action.
21B	Plant 3 Transfer Station	Adipic acid silos	Impacted debris in AOC 21B was removed as part of the ICM.	No further action.
22	Plant 3	Tote storage area	Soil at sampling locations AOC 22-1 through AOC 22-4 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were not identified in soil at sampling locations AOC 22-3 and 22-4 at concentrations above guidance values. Two SVOCs were identified in soil at sampling locations AOC 22-1 and AOC 22-2 at estimated concentrations that are slightly above the TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil (at locations AOC 22-1 and 22-2) to be identified in SMP.
23	Plant 3 Warehouse	Non-hazardous waste accumulation	Concrete at sampling locations AOC 23-1 and AOC 23-2 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling locations AOC 23-3 and AOC 23-4 does not exhibit PCBs, VOCs, or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
24	Tank Farm	Transfer station for the Tank Farm	Soil at sampling locations AOC 24-1 through 24-8 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at four sampling locations (AOC 24-1, AOC 24-2, AOC 24-5, and AOC 24-7) at concentrations slightly TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soils (at locations AOC 24-1, AOC 24-2 and AOC 24-7 to be identified in SMP).
25	Pilot Plant	Former soil pile area removed from AOC 10	NYSDEC previously approved no further action for this AOC.	No further action.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
26	Misc.	Not Applicable	AOC previously deleted.	No further action.
27A	Shipping/ Receiving Shipping/ Receiving	Non-hazardous, off-spec, damaged product and raw material storage Non-hazardous, off-spec, damaged product and raw material storage	Soil at sampling locations AOC 27A-1 and AOC 27A-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. Two SVOCs (benzo(a)pyrene and dibenzo(a,h)anthracene) were identified at location AOC 27A-1 at concentrations slightly above the TAGM guidance values. Bis(2-ethylhexyl)phthalate was identified at sampling location AOC 27 A-2 at a concentration of 720 ppm, which is above the 50 ppm guidance value. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
27B			Soil at sampling locations AOC 27B-1 and AOC 27B-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were not identified at location AOC 27B-2 at concentrations above the guidance values. Three SVOCs (benzo(a)pyrene, dibenzo(a,h)anthracene, and phenol) were identified at location AOC 27B-1 at estimated concentrations slightly above the guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil (at location AOC 27B-1) to be identified in SMP.
27C			Soil at sampling locations AOC 27C-1 and AOC 27C-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified in soil at both sampling locations at estimated concentrations slightly above the guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
27D			With one minor exception, soil at sampling location AOC 27D-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. One SVOC (benzo(a)pyrene) was identified at an estimated concentration of 0.18 ppm, which is slightly above the 0.061 ppm guidance value. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
27E			NYSDEC previously approved no further action for this AOC.	No further action.
27F			Soil at sampling locations AOC 27F-1 and AOC 27F-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	No further action.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
27G	Shipping/ Receiving	Non-hazardous, off-spec, damaged product and raw material storage	With a minor exception, soil at sampling locations AOC 27G-1 and AOC 27G-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Two SVOCs (benzo(a)pyrene and dibenzo(a,h)anthracene) were identified at location AOC 27G-1 at estimated concentrations of 0.22 ppm and 0.047 ppm, respectively, which are slightly above the guidance values of 0.061 and 0.014 ppm. Glycols were not detected in soil within this AOC.	SVOCs in soil (at location AOC 27G-1) to be identified in SMP.
27H			With a minor exception, soil at sampling locations AOC 27H-1 and AOC 27H-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Three SVOCs (benzo(a)anthracene, benzo(a)pyrene, and dibenzo(a,h)anthracene) were identified at location AOC 27H-1 at estimated concentrations slightly above the guidance values. Ethylene glycol was identified in sample AOC 27H-2 at an estimated concentration of 7.6 ppm.	SVOCs in soil (at location AOC 27H-1) to be identified in SMP.
27I			Soil at sampling locations AOC 27I-1 and AOC 27I-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at the AOC 27 soil sampling locations at concentrations slightly above the TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil to be identified in SMP.
27J			With a minor exception, soil at sampling locations AOC 27J-1 and AOC 27J-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values: four SVOCs were identified at location AOC 27J-1 at estimated concentrations slightly above the guidance values. Glycols were not detected in soil within this AOC.	SVOCs in soil (at location AOC 27J-1) to be identified in SMP.
28	Recharge Basin	Sump #1	NYSDEC previously approved no further action for this AOC.	No further action.
29		Sump #2	NYSDEC previously approved no further action for this AOC.	No further action.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
30	Recharge Basin	Sump #3 Stormwater	Debris at sampling locations AOC 30-1, AOC 30-2, and AOC 30-3 exhibits PCBs at estimated concentrations of 4.3 ppm, 2.1 ppm, and 1.6 ppm, respectively. One VOC (tetrachloroethene) was identified in the debris samples, but the concentrations were low (0.007 and 0.008 ppm). SVOC concentrations identified in the debris appear to be low (generally less than 1 ppm to 10 ppm). Selected inorganic constituents (chromium, copper, lead, nickel, and zinc) were identified in the debris at concentrations that appear slightly elevated. Glycol was not detected in debris within this AOC.	PCBs, SVOCs, and inorganic constituents in debris to be identified in SMP.
31	Recharge Basin	Sump #4 SPDES discharge	Surface soil at sampling locations AOC 31-1 through AOC 31-4 exhibits PCBs at concentrations above the 1 ppm TAGM 4046 surface soil guidance value. VOCs were not identified in soil within this AOC at concentrations above TAGM 4046 guidance values. SVOCs were identified at concentrations slightly above guidance values in the two samples, but not in the duplicate sample. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be elevated above typical background values.	PCBs, SVOCs, and inorganics in soil to be identified in SMP.
32	Recharge Basin	Sump #5	PCBs and glycols were not detected at soil sampling location AOC 32-1 at concentrations above laboratory detection limits.	No further action.
33	Recharge Basin	Sump #6	Surface soil at sampling location AOC 33-1 exhibits PCBs at an estimated concentration of 1.5 ppm, which is slightly above the 1 ppm TAGM 4046 surface soil guidance value.	PCBs in soil to be identified in SMP.
34	Cooling Tower	Cooling Tower Sump	NYSDEC previously approved no further action for this AOC.	No further action.
35A	Admin.	Septic tank/leachate pits east of Administration Building	Soil at sampling locations AOC 35A-1 and AOC 35A-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35B	Plant 1	Septic tank/leachate pits northwest of Plant 1	Soil at sampling locations AOC 35B-1 and AOC 35B-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.

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SWMU/AOC Number	Area	Location	Findings	Proposed Action
35C	Plant 1	Septic tank/leachate pits west of Plant 1	Soil at sampling locations AOC 35C-1, AOC 35C-2, and AOC 35C-3 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35D	Plant 1	Septic tank/leachate pits southwest of Plant 1	With one minor exception, soil at sampling locations AOC 35D-1 and AOC 35D-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values: One SVOC (benzo(a)pyrene) was identified at location AOC 35D-2 at an estimated concentration of 0.065 ppm, which is slightly above the 0.062 ppm guidance value. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Benzo(a)pyrene in soil (at location AOC 35D-2) to be identified in SMP.
35E	Plant 2	Septic tank/leachate pits southwest of Plant 2	Soil at sampling locations AOC 35E-1 and AOC 35E-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35F	Pilot Plant	Septic tank/leachate pits northwest of Pilot Plant	Soil at sampling locations AOC 35F-1, AOC 35F-2, and AOC 35F-3 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35G	Admin.	Septic tank/leachate pits south of Administration Building	Soil at sampling locations AOC 35G-1 and AOC 35G-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35H	Plant 1	Suspected leachate pit northeast of Plant 1	Soil at sampling location AOC 35H-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.

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35I	Plant 1	Suspected leachate pit northeast of Plant 1	Soil at sampling locations AOC 35I-1 and AOC 35I-2 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35J	Plant 3	Suspected leachate pits southeast of Plant 3	Soil at sampling location AOC 35J-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35K	Plant 1	Suspected leachate pit northeast of Plant 1	Soil at sampling location AOC 35K-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35L	Plant 1	Suspected leachate pit southwest of Plant 1	Soil at sampling location AOC 35L-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35M	Pilot Plant	Suspected leachate pits east of Pilot Plant	Soil at sampling location AOC 35M-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35N	Admin.	Suspected leachate pits north of Administration Building	Soil at sampling location AOC 35N-1 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
35O	Plant 1	Suspected leachate pit beneath northwest end of Plant 1	Sample collection was not possible due to the presence of a construction and demolition (C&D) debris stockpile over the approximate location of the suspected leachate pit as identified using dimensions shown on the design drawings.	Sampling to be performed following slab demolition if leachate pit is found by geophysical survey activities.
36	Admin.	Administration Building closed. Lab storage area	Concrete at sampling location AOC 36-1 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals.	No further action.

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37	Plant 2	DOA Sump	Concrete at sampling location AOC 37-2 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling location AOC 37-3 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at concentrations slightly above TAGM 4046 soil guidance values in soil at sampling location AOC 37-3. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	SVOCs, cobalt, and lead in soil to be identified in SMP.
38	Plant 2	Exterior trench	Impacted debris in AOC 38 was removed as part of the ICM.	No further action.
39	Plant 1	Electrical transformers	Concrete pad and PCB-impacted soils in AOC 39 were removed as part of the ICM. Verification soil sample results indicate that PCB concentrations in soils at the excavation limits are less than the TAGM 4046 soil guidance values.	No further action.
40	Plant 3	Trench system	Accessible impacted debris in AOC 40 was removed as part of the ICM. Debris previously encountered beneath the concrete previously used to fill a portion of the former Plant 3 trench system will be removed when the concrete floor slab in the area is removed. The debris will be collected, characterized, and transported for proper offsite disposal.	Demolition and follow-up debris removal, then no further action.

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41	Plant 1	Stained concrete in warehouse	Concrete at sampling locations AOC 41-1, AOC 41-2, and AOC 41-3 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling locations AOC 41-4 through AOC 41-8 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	Inorganic constituents in soil (at locations AOC 41-6 through AOC 41-8) to be identified in SMP.
42	Plant 1	Center trench	Impacted debris in AOC 42 was removed as part of the ICM.	No further action.
43	Plant 1	Sump in foundation, NE end of plant	Impacted debris in AOC 43-1 was removed as part of the ICM.	No further action.
44	Plant 1	Sump in foundation, SE end of plant	Standing water and impacted debris in AOC 44 was removed as part of the ICM.	No further action.

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HICKSVILLE, NEW YORK

SWMU/AOC Number	Area	Location	Findings	Proposed Action
45	Pilot Plant	Sump in NE corner of Plant (interior and exterior)	Impacted debris in AOC 45 was removed as part of the ICM. Concrete at sampling location AOC 45-3 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Additional pre-demolition concrete characterization sampling will be performed to further evaluate PCB concentrations in the concrete. The extent of PCB-impacted soils in the vicinity of the Pilot Plant sump was delineated as part of the ICM. Soils within and around AOC 45 exhibiting PCBs at concentrations above 50 ppm (as delineated by the ICM) will be addressed via removal. A work plan detailing the proposed soil removal activities in the Pilot Plant area will be submitted to the NYSDEC under separate cover.	Soils exhibiting PCBs at concentrations above 50 ppm to be addressed via removal as a separate ICM.
46	Plant 2	Scale Area and Circular Plate Area in foundation	Impacted debris in AOC 46 was removed as part of the ICM. Concrete at sampling location AOC 46-3 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. Soil at sampling location AOC 46-4 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	No further action.
47	Plant 2	Trench system and sump leading to sump 4	Structures had been filled in with concrete. Therefore, no debris samples collected at this location.	No further action.

TABLE 8
SUMMARY OF FINDINGS AND PROPOSED ACTIONS

RCRA FACILITY INVESTIGATION & INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SWMU/AOC Number	Area	Location	Findings	Proposed Action
48	Plant 1	Empty drum storage at NW end of Warehouse	Soil at sampling locations AOC 48-1 and AOC 48-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were identified at concentrations above TAGM 4046 soil guidance values at both sampling locations, but the concentrations at location AOC 48-2 were only slightly above the guidance values. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	SVOCs and lead in soil (at location AOC 48-1) to be identified in SMP.
49	Pilot Plant	Trench around East wall	Impacted debris in AOC 49 was removed as part of the ICM. Concrete at sampling location AOC 45-3 does not exhibit a toxicity characteristic for VOCs, SVOCs, or metals. With one minor exception, soil at sampling location AOC 49-4 does not exhibit VOCs or SVOCs at concentrations above TAGM 4046 soil guidance values. One SVOC (benzo(a)pyrene) was identified at location AOC 49-4 at an estimated concentration of 0.067 ppm, which is slightly above the 0.061 ppm guidance value. Glycols were not detected in soil within this AOC. Inorganic constituent concentrations in soil appear to be generally consistent with typical background values.	SVOCs in soil to be identified in SMP.
50	Plant 1	Underground Storage Tank	Soil at sampling locations AOC 50-1 and AOC 50-2 does not exhibit VOCs at concentrations above TAGM 4046 soil guidance values. SVOCs were not identified at concentrations above TAGM 4046 soil guidance values, except at location AOC 50-2. Benzo(a)pyrene was identified at AOC 50-2 at an estimated concentration of 0.063 ppm, slightly above the 0.060 TAGM 4046 soil guidance value. Tank closure performed as part of ICM. PCB concentration in overburden soils removed from above the UST are less than the 10 ppm TAGM 4046 subsurface soil guidance value.	No further action.

TABLE 8
SUMMARY OF FINDINGS AND PROPOSED ACTIONS

RCRA FACILITY INVESTIGATION & INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Notes:
1. PCBs = Polychlorinated Biphenyls.
2. VOCs = Volatile Organic Compounds.
3. SVOCs = Semi-Volatile Organic Compounds.
4. TCLP = Toxicity Characteristic Leaching Procedure.
5. TAGM 4046 Soil Guidance Values = soil guidance values presented in the New York State Department of Environmental Conservation (NYSDEC) Technical and Administrative Guidance Memorandum (TAGM) titled "Determination of Soil Cleanup Objectives and Cleanup Levels", HWR-94-4046 (TAGM 4046) dated January 24, 1994.

Figures

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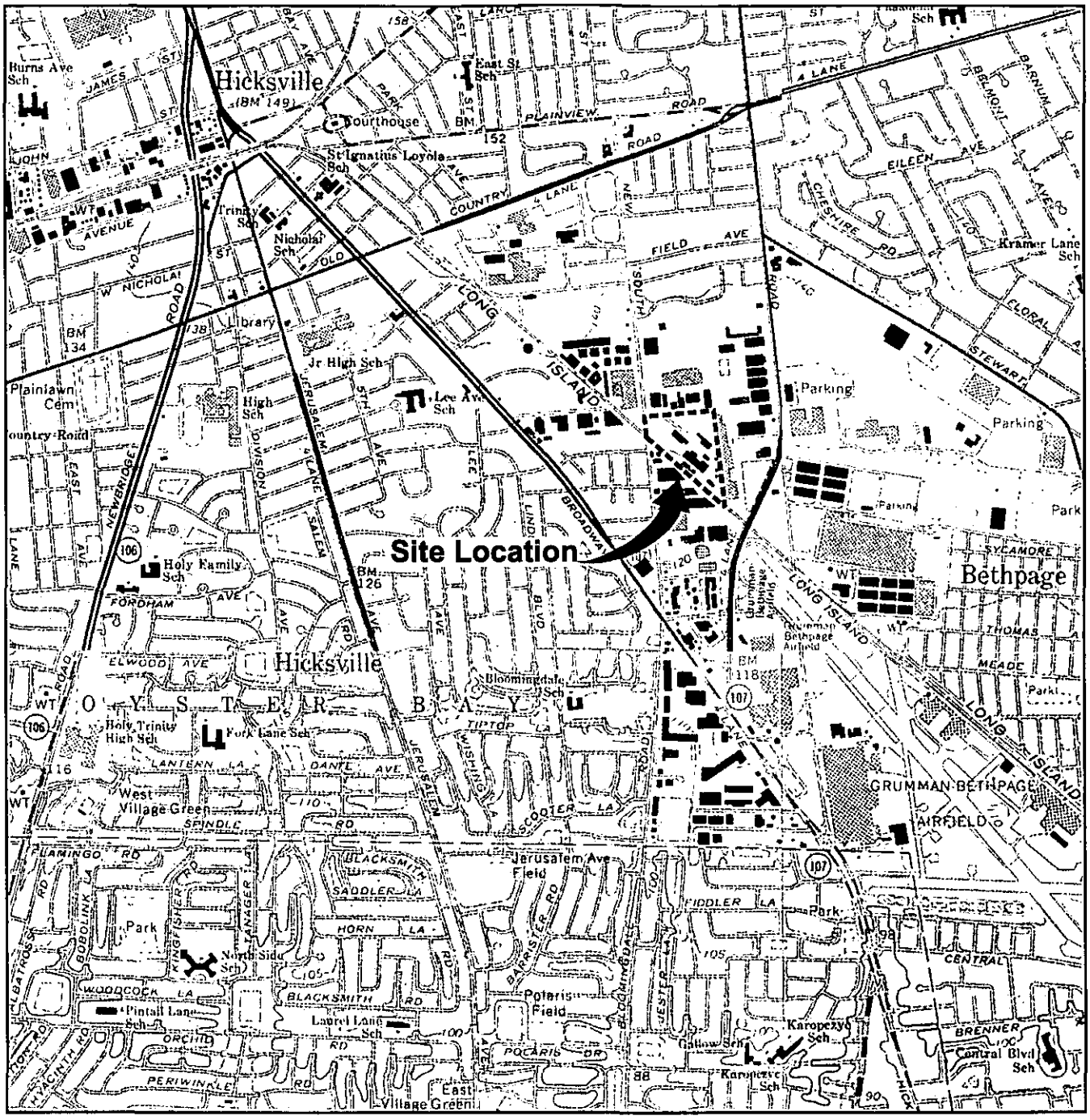
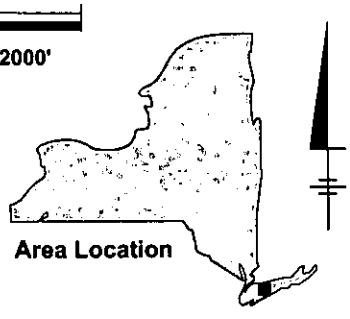
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists



REFERENCE: Base Map USGS 7.5 Min. Quad., Hicksville, N.Y. 1967, Photorevised 1979.

2000' 0 2000'

Approximate Scale: 1" = 2000'



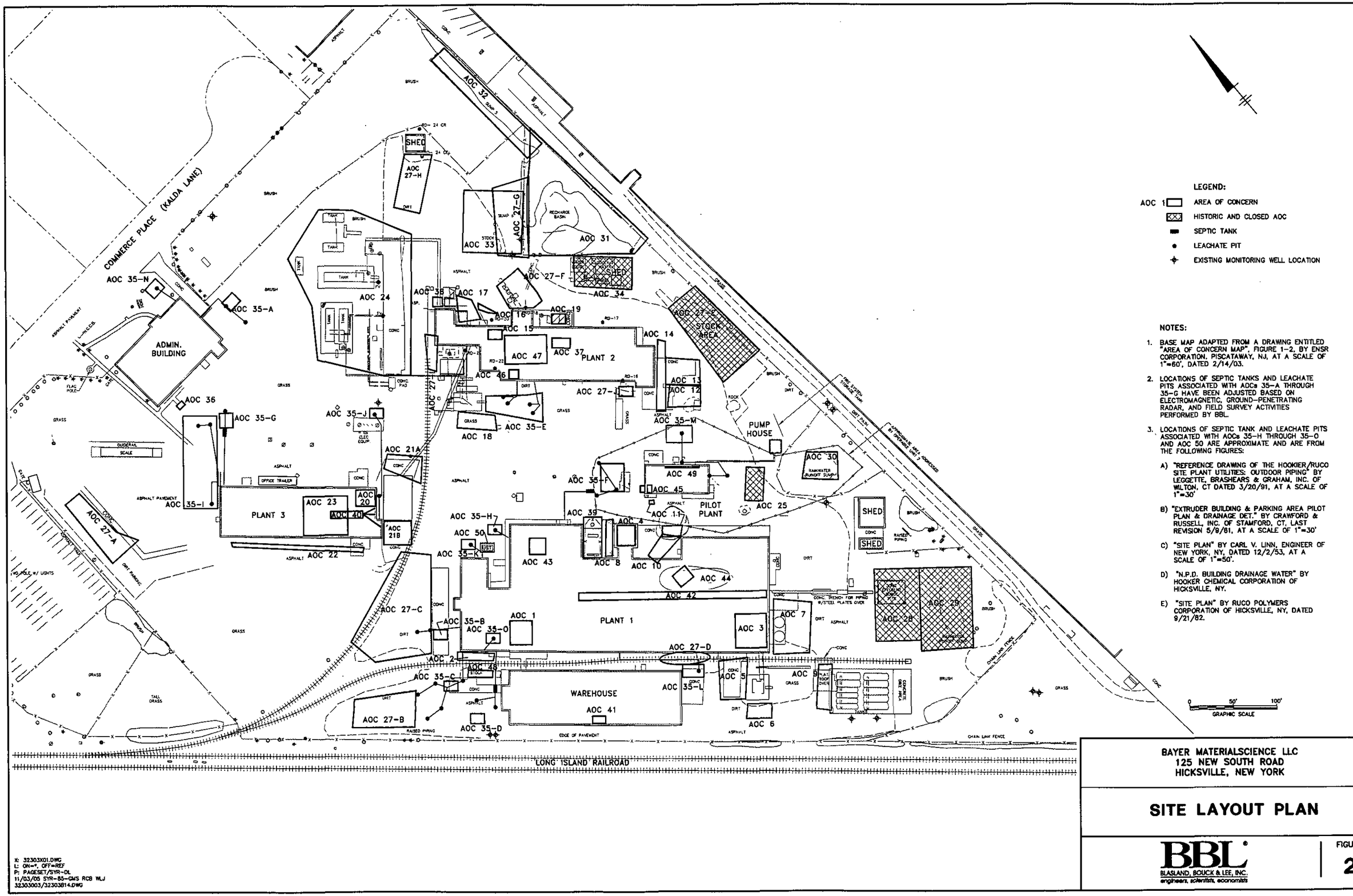
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SITE LOCATION MAP

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
1

03/21/05 SYR-D85-DJH
32303001/32303n01.cdr



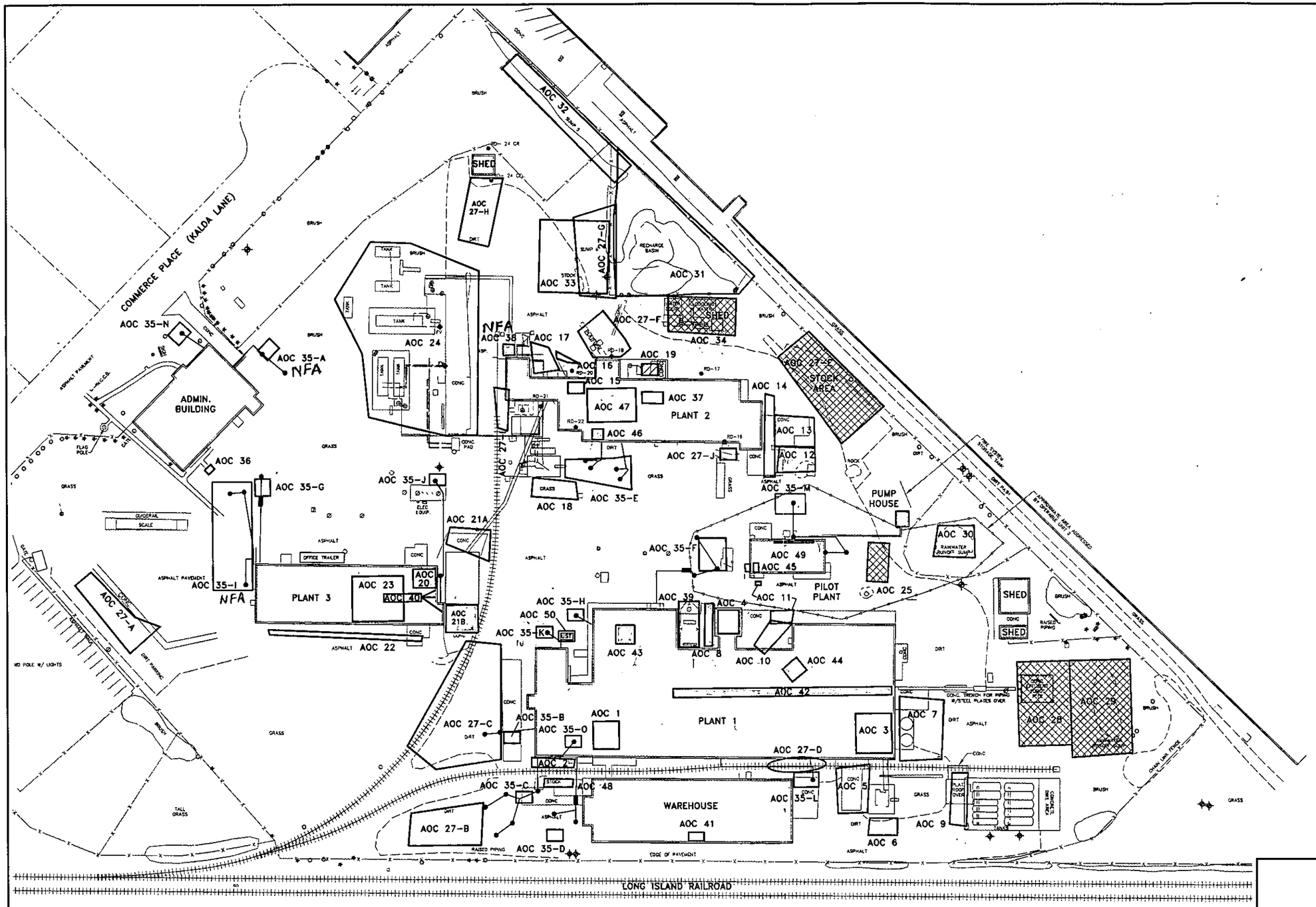
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SITE LAYOUT PLAN

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 2

X: 32303X01.DWG
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
11/03/05 SYR-85-GMS RCB WLJ
32303003/32303814.DWG



LEGEND:

- SUBSURFACE STRUCTURE CLEANED DURING ICM ACTIVITIES
- AOC 1 — AREA OF CONCERN
- HISTORIC AND CLOSED AOC
- SEPTIC TANK
- LEACHATE PIT
- EXISTING MONITORING WELL LOCATION

NOTES:

1. BASE MAP ADAPTED FROM A DRAWING ENTITLED "AREA OF CONCERN MAP", FIGURE 1-2, BY ENSR CORPORATION, PISCATAWAY, NJ, AT A SCALE OF 1"=60', DATED 2/14/03.
2. LOCATIONS OF SEPTIC TANKS AND LEACHATE PITS ASSOCIATED WITH AOCs 35-A THROUGH 35-G HAVE BEEN ADJUSTED BASED ON ELECTROMAGNETIC, GROUND-PENETRATING RADAR, AND FIELD SURVEY ACTIVITIES PERFORMED BY BBL.
3. LOCATIONS OF SEPTIC TANK AND LEACHATE PITS ASSOCIATED WITH AOCs 35-H THROUGH 35-O AND AOC 50 ARE APPROXIMATE AND ARE FROM THE FOLLOWING FIGURES:

A) "REFERENCE DRAWING OF THE HOOKIER/RUCO SITE PLANT UTILITIES: OUTDOOR PIPING" BY LEGGETTE, BRASHEARS & GRAHAM, INC. OF WILTON, CT DATED 3/20/91, AT A SCALE OF 1"=30'

B) "EXTRUDER BUILDING & PARKING AREA PILOT PLAN & DRAINAGE DET." BY CRAWFORD & RUSSELL, INC. OF STAMFORD, CT, LAST REVISION 5/9/61, AT A SCALE OF 1"=30'

C) "SITE PLAN" BY CARL V. LINN, ENGINEER OF NEW YORK, NY, DATED 12/2/53, AT A SCALE OF 1"=50'.

D) "N.P.D. BUILDING DRAINAGE WATER" BY HOOKER CHEMICAL CORPORATION OF HICKSVILLE, NY.

E) "SITE PLAN" BY RUCO POLYMERS CORPORATION OF HICKSVILLE, NY, DATED 9/21/82.

0 50' 100'
GRAPHIC SCALE

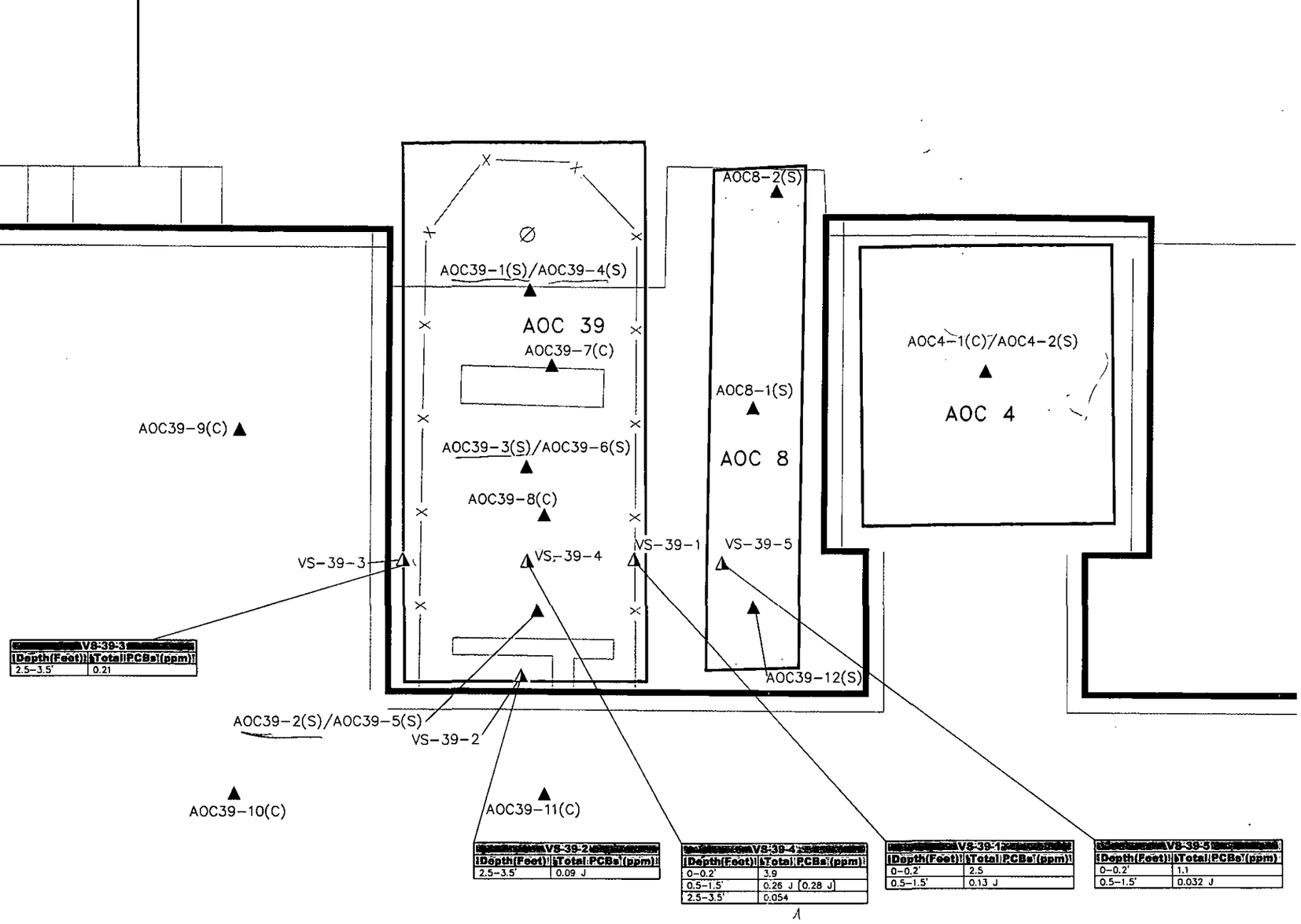
X: 32303X01.DWG
L: ON=*; OFF=REF
P: PAGESET/SYR-DL
11/03/05 SYR-BS-GMS RCB WLJ
32303008/32303B05.DWG

BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SUBSURFACE STRUCTURE CLEANING LOCATIONS

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 3



VS-39-3	
Depth (Feet)	Total PCBs (ppm)
2.5–3.5'	0.21

VS-39-2	
Depth (Feet)	Total PCBs (ppm)
2.5–3.5'	0.09 J

VS-39-4	
Depth (Feet)	Total PCBs (ppm)
0–0.2'	3.9
0.5–1.5'	0.26 J [0.28 J]
2.5–3.5'	0.054

VS-39-1	
Depth (Feet)	Total PCBs (ppm)
0–0.2'	2.5
0.5–1.5'	0.13 J

VS-39-5	
Depth (Feet)	Total PCBs (ppm)
0–0.2'	1.1
0.5–1.5'	0.032 J

LEGEND:

- AREA OF 2' DEEP EXCAVATION
- ICM PRE-EXCAVATION VERIFICATION SAMPLING LOCATION
- RFI SAMPLING LOCATION
- AOC 39 — AREA OF CONCERN

NOTES:

1. BASE MAP ADAPTED FROM A DRAWING ENTITLED "AREA OF CONCERN MAP", FIGURE 1-2, BY ENSR CORPORATION, PISCATAWAY, NJ, AT A SCALE OF 1"=60', DATED 2/14/03.
2. RFI SAMPLING LOCATIONS WERE SURVEYED BY BBL, INC. DURING FEBRUARY 2004 AND OCTOBER 2004. ICM SAMPLING LOCATIONS ARE APPROXIMATE.
3. RFI = RCRA FACILITY INVESTIGATION.
4. ICM = INTERIM CORRECTIVE MEASURE.
5. PCBs = POLYCHLORINATED BIPHENYLS.
6. ALL SOIL SAMPLE CONCENTRATIONS ARE PRESENTED IN PARTS PER MILLION (ppm) WHICH IS EQUIVALENT TO MILLIGRAMS PER KILOGRAM (mg/kg.)
7. VALUES IN BRACKETS [ ] INDICATE RESULTS FOR A BLIND DUPLICATE SAMPLE FROM THE SAME INTERVAL.
8. J = INDICATES ESTIMATED VALUE.

0 10' 20'

GRAPHIC SCALE

PLANT 1

X: NONE
L: ON=*, OFF=REF
P: PAGESET/SYR-DL
11/02/05 SYR-BS-RCB RCB WLJ
32303008/32303C02.DWG

BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PCB SOIL ANALYTICAL RESULTS FOR AOC 39 (PPM)

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 4

VS-45-8		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/8/2005	5.7
(6.5 – 7.5')	6/8/2005	0.5

VS-45-4		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/9/2005	45
(6.5 – 7.5')	6/9/2005	11.5 J

VS-45-6		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/8/2005	0.16
(6.5 – 7.5')	6/8/2005	0.095

VS-45-1		
Depth(Feet)	Date	Total PCBs (ppm)
(6.8 – 7.3')	6/9/2005	71 J
(8.8 – 9.8')	6/9/2005	7.3 [11.8]

VS-45-12		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	6/29/2005	4.4
(6.8 – 7.3')	6/29/2005	0.56
(10.3 – 12.3')	6/29/2005	0.14
(16 – 18')	6/29/2005	0.23 J

VS-45-20		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	8/9/2005	0.18 J
(6.8 – 7.3')	8/9/2005	4.3 J
(10 – 12')	8/9/2005	110
(16 – 18')	8/9/2005	1,100
(20 – 22')	8/9/2005	320

VS-45-21		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	8/9/2005	1.3
(6.8 – 7.3')	8/9/2005	2.3
(10 – 12')	8/9/2005	2.9
(16 – 18')	8/9/2005	0.095

VS-45-13		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	6/29/2005	0.32
(6.8 – 7.3')	6/29/2005	0.048
(10.3 – 12.3')	6/29/2005	0.042
(16 – 18')	6/29/2005	0.67 J

VS-45-7		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	6/29/2005	22 J
(6.8 – 7.3')	6/9/2005	9,300 J
(8.8 – 9.8')	6/9/2005	14,000 J
(10.3 – 12.3')	6/29/2005	3,600
(12.3 – 14.3')	6/29/2005	8,500
(14.3 – 16')	6/29/2005	17,200
(22 – 24')	6/29/2005	4.1

VS-45-2		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	6/15/2005	5.3
(0.5 – 2')	6/15/2005	28
(4 – 6')	6/15/2005	830
(6.8 – 7.3')	6/9/2005	2,000
(6.8 – 7.3')	6/15/2005	660
(8.8 – 9.8')	6/9/2005	5,500
(8.8 – 9.8')	6/15/2005	1,800
(10.3 – 12.3')	6/15/2005	4,100
(12.3 – 14.3')	6/15/2005	2,300
(14.3 – 16')	6/15/2005	2,400
(16 – 18')	6/29/2005	3,700 [5,400]
(22 – 24')	6/29/2005	590
(26 – 28')	8/4/2005	81
(30 – 32')	8/4/2005	1.0
(34 – 36')	8/4/2005	26 [48]
(40 – 42')	8/4/2005	7.4
(44 – 46')	8/4/2005	6.0
(50 – 52')	8/4/2005	0.028 J

VS-45-22		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	8/8/2005	0.53
(6.8 – 17.3')	8/8/2005	3.8 [4.4]
(10 – 12')	8/8/2005	0.21
(16 – 18')	8/8/2005	0.94

VS-45-14		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	6/30/2005	0.30 [0.34 J]
(6.8 – 7.3')	6/30/2005	0.024
(10.3 – 12.3')	6/30/2005	0.18 J
(16 – 18')	6/30/2005	0.035

VS-45-11		
Depth(Feet)	Date	Total PCBs (ppm)
(0 – 0.5')	6/15/2005	290
(2 – 4')	6/15/2005	58
(6.8 – 7.3')	6/15/2005	2,200
(8.8 – 9.8')	6/15/2005	1,100
(10.3 – 12.3')	6/15/2005	700 [830]
(12.3 – 14.3')	6/15/2005	680
(14.3 – 16')	6/15/2005	4,000
(16 – 18')	6/29/2005	1,500
(22 – 24')	6/29/2005	23

VS-45-3		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/9/2005	0.51 J
(6.5 – 7.5')	6/9/2005	0.20 J

VS-45-10		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/9/2005	3.5 J
(6.5 – 7.5')	6/9/2005	1.9 J

VS-45-9		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/8/2005	0.43
(6.5 – 7.5')	6/8/2005	0.07

VS-45-23		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	8/9/2005	1.5 J [2.1]
(6.5 – 7.5')	8/9/2005	0.99 J

VS-45-8		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/8/2005	0.053
(6.5 – 7.5')	6/8/2005	1.0

CONC

VS-45-15

AOC49-1(D)

VS-45-16

AOC 49

AOC49-2(D)/AOC49-3(C)/AOC49-4(S)

PILOT PLANT TRENCH AREA

VS-45-13

VS-45-12

VS-45-21

VS-45-17

VS-45-19

VS-45-20 (24')

VS-45-5

VS-45-6

VS-45-1 (8')

VS-45-7 (19')

AOC 45

(R) VS-45-11 (20')

VS-45-22

VS-45-18

VS-45-4

VS-45-2 (29') (R)

VS-45-14

AOC45-2(D)

PILOT PLANT SUMP

VS-45-3

VS-45-10

CONCRETE

(R) VS-45-9

(R) VS-45-8

AOC45-1(D)/AOC45-3(C)/AOC45-4(S)

STAIRCASE

VS-45-23

AOC11-1A(D)

CATCH BASIN

AOC11-3(S)

AOC11-1(S)

A A' B B'

LEGEND:

- ICM PRE-EXCAVATION VERIFICATION SAMPLING LOCATION (ALL SAMPLES ARCHIVED)
- ICM PRE-EXCAVATION VERIFICATION SAMPLING LOCATION EXHIBITING PCBs AT CONCENTRATIONS <50 PPM
- ICM PRE-EXCAVATION VERIFICATION SAMPLING LOCATION EXHIBITING PCBs AT CONCENTRATIONS >50 PPM
- RFI SAMPLING LOCATION
- HORIZONTAL EXTENT OF SOILS EXHIBITING PCBs > 50 PPM
- (19') DEPTH OF SOILS EXHIBITING PCBs AT CONCENTRATION > 50 PPM
- AOC 45 AREA OF CONCERN
- LEACHATE PIT
- A A' CROSS SECTION LOCATION (SEE FIGURE 6 FOR SECTION)

NOTES:

1. BASE MAP ADAPTED FROM A DRAWING ENTITLED "AREA OF CONCERN MAP", FIGURE 1-2, BY ENSR CORPORATION. PISCATAWAY, NJ, AT A SCALE OF 1"=60', DATED 2/14/03.
2. RFI SAMPLING LOCATIONS WERE SURVEYED BY BBL, INC. DURING FEBRUARY 2004 AND OCTOBER 2004. ICM SAMPLING LOCATIONS WERE SURVEYED BY BBL, INC. DURING AUGUST 2005.
3. RFI = RCRA FACILITY INVESTIGATION
4. ICM = INTERIM CORRECTIVE MEASURE
5. PCBs = POLYCHLORINATED BIPHENYLS
6. ALL SOIL SAMPLE CONCENTRATIONS ARE PRESENTED IN PARTS PER MILLION (PPM), WHICH IS EQUIVALENT TO MILLIGRAMS PER KILOGRAM (MG/KG).
7. SHADED VALUES INDICATE THAT THE TOTAL PCB CONCENTRATION EXCEEDS 50 PPM.
8. DEPTHS REPORTED FOR SAMPLES COLLECTED OUTSIDE THE FORMER PILOT PLANT FOOTPRINT ARE RELATIVE TO THE SURROUNDING GROUND SURFACE. DEPTHS REPORTED FOR SAMPLES COLLECTED WITHIN THE FORMER PILOT PLANT FOOTPRINT ARE RELATIVE TO THE TOP OF THE SOIL SURFACE BENEATH THE FLOOR SLAB, WHICH IS APPROXIMATELY 2.3 FEET HIGHER THAN THE SURROUNDING GROUND SURFACE.
9. RESULTS SHOWN IN BRACKETS [ ] ARE DUPLICATE SAMPLE RESULTS.
10. J = INDICATES ESTIMATED VALUE.

0 10' 20'

GRAPHIC SCALE

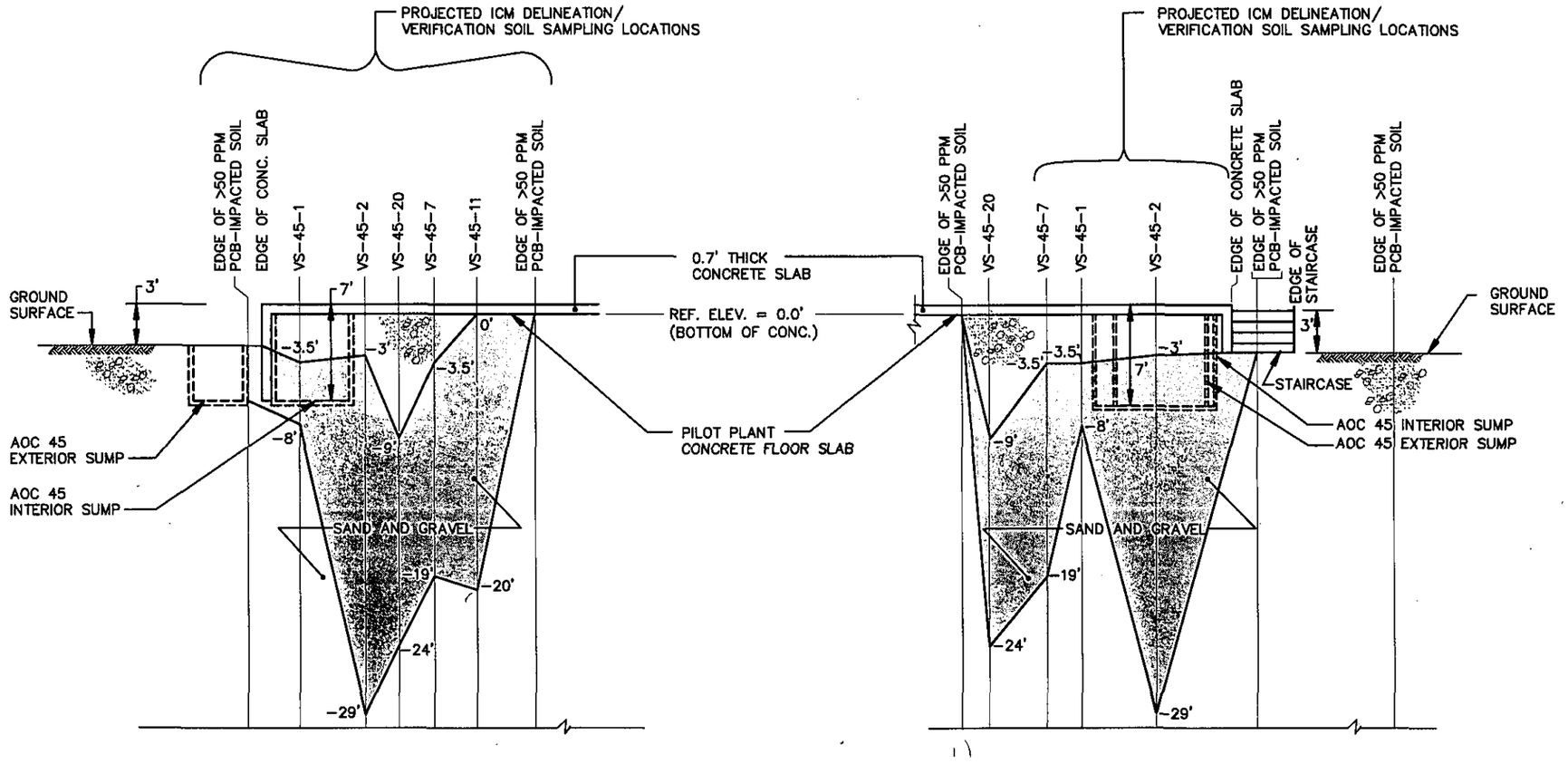
X: NONE
L: ON=*, OFF=REF
P: PAGESET/SYR-DL2B1
11/02/05 SYR-85-RCB RCB WLJ
32306001/32306803.DWG

BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PCB SOIL ANALYTICAL RESULTS FOR AOC 45 (PPM)

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 5



SECTION A-A'

APPROX. HORIZ. SCALE: 1"=10'
APPROX. VERT. SCALE: 1"=10'

SECTION B-B'

APPROX. HORIZ. SCALE: 1"=10'
APPROX. VERT. SCALE: 1"=10'

LEGEND:

- SAND AND GRAVEL
- VERTICAL EXTENT OF SOILS EXHIBITING PCBs AT CONCENTRATIONS GREATER THAN 50 PPM
- −29' PROJECTED DEPTH SHOWN IN FEET BELOW CONCRETE SURFACE

NOTES:

1. PCBs = POLYCHLORINATED BIPHENYLS
2. PPM = PARTS PER MILLION

0 10' 20'
GRAPHIC SCALE

BAYER MATERIAL SCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

**SECTIONS A-A' & B-B'
(VERTICAL EXTENT OF PCB IMPACT SOIL IN AOC45)**

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 6

X: (XREF)
L: (LAYER)
P: PAGESET/PLT-BL1
11/3/05 SYRACUSE-DIV 85-TJR RCB
32303009/32303V01.DWG

Appendix A

Relevant Correspondence

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

SUMMARY OF RELEVANT PROJECT CORRESPONDENCE

INTERIM CORRECTIVE MEASURE CERTIFICATION REPORT
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD, HICKSVILLE, NEW YORK

Date	Title of Correspondence
4/21/2005	E-mail Correspondence from NYSDEC: Comments on the ICM Work Plan
4/26/2005	Letter to NYSDEC: Response to Comments on the ICM Work Plan
5/9/2005	E-mail Correspondence from NYSDEC: Conditional Approval of the ICM Work Plan
5/17/2005	Letter from NYSDEC: Conditional Approval of the ICM Work Plan
6/1/2005	E-mail Correspondence to NYSDEC: ICM Schedule
6/13/2005	E-mail Correspondence to NYSDEC: ICM Progress Update
6/16/2005	E-mail Correspondence to NYSDEC: Additional ICM Progress Update
6/16/2005	E-mail Correspondence to NYSDEC: Request to Backfill UST Excavation
6/17/2005	E-mail Correspondence from NYSDEC: Conditional Approval to Backfill the UST Excavation
6/27/2005	E-mail Correspondence to NYSDEC: ICM Progress Update # 3
7/28/2005	E-mail Correspondence to NYSDEC: ICM Progress Update #4
8/1/2005	E-mail Correspondence from NYSDEC: Request for Additional Sampling
8/2/2005	E-mail Correspondence to NYSDEC: Proposed Additional Sampling
8/2/2005	E-mail Correspondence from NYSDEC: Approval of Proposed Additional Sampling

4/21/2005
E-mail Correspondence from NYSDEC

Comments on the ICM Work Plan

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

From: "Alicia Barraza" <aabarraz@gw.dec.state.ny.us>
To: <joel.robinson@bayermaterialscience.com>, <JCB@bbl-inc.com>
Date: 4/21/2005 4:31:45 PM
Subject: Bayer Hicksville ICM

Attached are DEC's comments for the ICM work plan received on April 6th.
If you wish to set up a call to discuss, let me know.

April 21, 2005

Re: Bayer MaterialScience LLC, Hicksville, NY; USEPA ID No. NYD002920312; April 2005

2,2,2 Underground Storage Tank Removal

- If known, clarify if the tank was placed on any type of bedding (such as gravel), or placed directly on the soil.
- The work plan states that soils will be staged for potential reuse as backfill material. Explain the process that will be implemented to determine if soils can be reused.
- The work plan proposes one sample each from the sidewall and bottom of the excavation for headspace screening using a PID. This number seems insufficient to the Department, considering the dimensions of the tank and the depth of the excavation.
- The Department should be consulted prior to determining the number and locations of verification soil samples.

2.2.3 Subsurface Structure Cleaning

- According to the work plan, a visual inspection of the interior surfaces of each selected subsurface structure will be conducted after water and debris removal. The structure cleaning will be considered completed based on visual inspection by an onsite BBL representative. Explain specifically what the visual inspection will look for, other than any remaining debris in the structures. Also clarify if the results of the visual inspection will be documented.

2.2.4 Pre-Excavation Delineation/Verification Soil Sampling

- Clarify if Bayer plans to do any field screening of soil samples for PCBs.
- The Department should be consulted prior to determining any additional soil boring and sampling activities.

2.2.5 Soil Excavation

- During the visual inspection of soil, if heavy staining is observed then the verification samples should also be analyzed for VOCs. Samples to be analyzed for VOC's should not be composited.
- It is not clear why the sidewall samples will be discrete and the bottom samples will be composited. Also explain the logic for collecting a sidewall sample from the 0-2 inch depth interval. This interval seems insufficient for a deep excavation. [See comments above for section 2.2.2.]

2.2.7 Air Monitoring

- Dust monitoring equipment should be moved daily, and as needed, depending on the

wind direction.

- A copy of the project-specific health and safety plan (HASP) should be included with the final ICM work plan.

2.2.9 Site Restoration

- The work plan states that sampling will be performed, as appropriate, to verify that the fill material does not exhibit unacceptable physical or chemical characteristics. Specify what sampling and analytical methods will be used to show that the material does not exhibit hazardous characteristics and/or unacceptable physical characteristics.
- Any excavated areas that are backfilled with demolition debris should be covered with a layer of clean fill material.

2.3 ICM Summary Report

- The final report should include the signature and stamp of a PE licensed in New York State.
- It should also include a summary of the air monitoring results.

4/26/2005
Letter to NYSDEC

Response to Comments on the ICM Work Plan

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engineers, scientists, economists

JOHN BRUSSEL - Modification to ICM Work Plan: Bayer Hicksville Site

From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us
Date: 4/26/2005 4:29 PM
Subject: Modification to ICM Work Plan: Bayer Hicksville Site
CC: joel.robinson@bayermaterialscience.com; khmurphy@gw.dec.state.ny.us; MOLINA, JOSEPH

Alicia:

On behalf of Bayer MaterialScience, please find the attached letter that modifies the ICM Work Plan for the above-referenced site. The letter is being submitted in response to the NYSDEC comments contained in your e-mail correspondence dated 4/25/05. A hard-copy of the letter will follow via U.S. mail.

Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.
Senior Engineer I
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

Tel: (315) 446-2570 (ext. 441)
Fax: (315) 449-4111
JCB@BBL-inc.com

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Transmitted Via E-Mail & U.S. Mail

April 26, 2005

Ms. Alicia Barraza
New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Solid Waste and Corrective Action
625 Broadway
Albany, New York 12233-7258

Re: Bayer MaterialScience LLC
125 New South Road – Hicksville, New York
ICM Work Plan Modification
USEPA ID#: NYD002920312
BBL Project #: 2302.32303 #5

Dear Ms. Barraza:

On behalf of Bayer MaterialScience LLC (Bayer), this letter modifies the *Interim Corrective Measure Work Plan* (the ICM Work Plan) prepared by Blasland, Bouck & Lee, Inc. (BBL, June 2004) for the Bayer site located in Hicksville, New York. The modification is being submitted in response to the New York State Department of Environmental Conservation's (NYSDEC's) comments included with your e-mail correspondence dated April 25, 2005. For ease of presentation, each NYSDEC comment is presented below, followed by Bayer's response.

Comments on Subsection 2.2.2 – Underground Storage Tank Removal

Comment 1

If known, clarify if the tank was placed on any type of bedding (such as gravel), or placed directly on the soil.

Response 1

Available facility design/construction drawings do not indicate the type of bedding material (gravel, soil, etc.) beneath the underground storage tank (UST).

♦ ♦ ♦

6723 Towpath Road • P.O. Box 66 • Syracuse, NY 13214-0066
Tel (315) 446-9120 • Fax (315) 449-0017 • www.bbl-inc.com • Offices Nationwide

Comment 2

The work plan states that soils will be staged for potential reuse as backfill material. Explain the process that will be implemented to determine if soils can be reused.

Response 2

The soils removed to expose the top of the UST and associated piping, ancillary equipment, and related utilities (if any) will be assessed for the potential presence of visible staining and obvious odors. The soils will also be field-screened using a photoionization detector (PID) to evaluate the potential presence of volatile organic vapors. If no visible staining, obvious odors, or elevated PID screening results are encountered, the soils will be re-used onsite as backfill material.

♦ ♦ ♦

Comment 3

The work plan proposes one sample each from the sidewall and bottom of the excavation for headspace screening using a PID. This number seems insufficient to the Department, considering the dimensions of the tank and the depth of the excavation.

Response 3

Based on the reported tank dimensions and cover material depth, it is currently anticipated that the tank excavation will be at least 6 feet wide, 14 feet long, and 7 feet deep, which corresponds to an excavation volume of approximately 22 cubic yards (CY). Although the sampling frequency proposed in the ICM Work Plan is consistent with the frequency presented in the NYSDEC document titled "Spill Technology and Remediation Series, Petroleum-Contaminated Soil Guidance Policy (STARS Memo #1)," dated August 1992, a revised sampling frequency is proposed to address the NYSDEC's concern that a total of five field screening samples may be insufficient. The proposed new sampling frequency is generally consistent with provisions in the NYSDEC's "Draft" DER-10 document titled, "Technical Guidance for Site Investigation and Remediation" [Section 5.5(b)4.ii.(2)] and will require the collection of:

- one grab sidewall sample per every 5 feet around the excavation perimeter (with a minimum of one sample per sidewall); and
- one discrete grab bottom sample per every 5 feet across the excavation floor (taking the larger dimension across the floor).

Sampling locations will be biased toward areas with a greater potential for impacts, such as discolored soils, near a corrosion hole, opposite a manway, or opposite a tank opening. Based on the proposed new sampling frequency and the currently anticipated excavation size, a total of 8 sidewall samples and 3 bottom samples will be collected for field screening.

♦ ♦ ♦

Comment 4

The Department should be consulted prior to determining the number and locations of verification soil samples.

Response 4

After the UST has been removed and soil samples from the excavation limits have undergone headspace screening using a PID, the NYSDEC will be contacted to discuss the need (if any) to collect verification soil samples from the UST excavation for laboratory analysis.

♦ ♦ ♦

Comment on Subsection 2.2.3 – Subsurface Structure Cleaning

Comment 5

According to the work plan, a visual inspection of the interior surfaces of each selected subsurface structure will be conducted after water and debris removal. The structure cleaning will be considered completed based on visual inspection by an onsite BBL representative. Explain specifically what the visual inspection will look for, other than any remaining debris in the structures. Also clarify if the results of the visual inspection will be documented.

Response 5

Besides being performed to look for any debris remaining in the subsurface structures, the visual inspection of each structure will also be performed to look for any heavy staining or large cracks in the walls/bottom that might suggest potential impacts to underlying soils. If heavy staining and cracks are observed in a structure, the NYSDEC will be contacted to discuss any further actions that may be needed.

Photographs will be taken to document the condition of each structure following cleaning. Results of the visual inspections (including photograph number) will be documented in the field notebook.

♦ ♦ ♦

Comments on Subsection 2.2.4 – Pre-Excavation Delineation/Verification Soil Sampling

Comment 6

Clarify if Bayer plans to do any field screening of soil samples for PCBs.

Response 6

Bayer reserves the option to perform field screening of delineation/verification soil samples. The field screening would be in accordance with United States Environmental Protection Agency (USEPA) SW-846 Method 4020 and with a detection limit of 50 parts per million (ppm). However, based on the high rate of false positives generated by the screening method at the 50 ppm detection limit, any screening results above 50 ppm would be suspect, and follow-up laboratory analysis would be needed to determine

the actual PCB concentration (to avoid subsequent excavation of more soils than needed). Field screening results less than 50 ppm could become the final results, subject to laboratory confirmation of the actual PCB concentration in a subset of the samples and NYSDEC approval.

♦ ♦ ♦

Comment 7

The Department should be consulted prior to determining any additional soil boring and sampling activities.

Response 7

Acknowledged. The NYSDEC will be contacted to discuss the need for (if any) and scope of any soil boring and sampling activities beyond those already outlined in the ICM Work Plan.

♦ ♦ ♦

Comments on Subsection 2.2.5 – Soil Excavation

Comment 8

During the visual inspection of soil, if heavy staining is observed then the verification samples should also be analyzed for VOCs. Samples to be analyzed for VOC's should not be composited.

Response 8

The former electrical transformer area was selected as an area of concern (AOC 39) based on the former presence of PCB-containing oil within the transformers. Volatile organic compounds (VOCs) were not identified as a constituent of interest for AOC 39. Accordingly, Bayer does not propose to submit post-excavation verification soil samples collected from AOC 39 (if any) for laboratory analysis for VOCs.

♦ ♦ ♦

Comment 9

It is not clear why the sidewall samples will be discrete and the bottom samples will be composited. Also explain the logic for collecting a sidewall sample from the 0-2 inch depth interval. This interval seems insufficient for a deep excavation. [See comments above for section 2.2.2.]

Response 9

Each post-excavation verification soil sample from AOC 39 (if any) will be a discrete sample collected from soils encountered beyond any "heavy staining". Based on the laboratory analytical results obtained for the RCRA Facility Investigation (RFI) soil samples, the excavation within AOC 39 is anticipated to be shallow, extending approximately 2 feet below the ground surface. The sidewall samples will be collected from the same depth where the staining was encountered (the 0 to 2-inch if the staining were to be found at, or immediately below the ground surface, or an appropriate 1-foot depth interval if the

staining were to be found below a depth of 2-inches). The bottom sample(s) will be collected over a 1-foot increment from the soils remaining below the staining.

The same approach would be used for AOC 45 (Sump at the Northwest Corner of the Pilot Plant) if it is determined that soil removal will be performed in this AOC. The NYSDEC will be contacted to discuss sampling intervals in the event that heavy staining is encountered in either AOC 39 or AOC 45.

♦ ♦ ♦

Comments on Subsection 2.2.7 – Air Monitoring

Comment 10

Dust monitoring equipment should be moved daily, and as needed, depending on the wind direction.

Response 10

Acknowledged. Upwind and downwind monitoring locations will be determined through visual observation (wind vane, windsock, or similar technique). Monitoring equipment/monitoring locations will be moved at any time during the work day, as needed, if a significant shift in wind direction is noted (e.g., +/-60 degrees from original upwind).

♦ ♦ ♦

Comment 11

A copy of the project-specific health and safety plan (HASP) should be included with the final ICM work plan.

Response 11

A HASP will be developed covering both the activities outlined in the ICM Work Plan and activities to be outlined in the Demolition Work Plan, which is currently being developed and will be submitted for NYSDEC review and approval. The HASP will be submitted to the NYSDEC under separate cover prior to initiation of ICM field activities.

♦ ♦ ♦

Comments on Subsection 2.2.9 – Site Restoration

Comment 12

The work plan states that sampling will be performed, as appropriate, to verify that the fill material does not exhibit unacceptable physical or chemical characteristics. Specify what sampling and analytical methods will be used to show that the material does not exhibit hazardous characteristics and/or unacceptable physical characteristics.

Response 12

The approach for site restoration under Subsection 2.2.9 is hereby revised by:

- removing the second bullet on Page 2-9 that begins as follows: "placing non-impacted crushed brick and mortar wall materials generated by previous building demolition activities in the excavated areas"; and

- adding a new sentence at the end of the subsection that reads, "Final site restoration, including characterization followed by subsequent backfilling using crushed brick and mortar materials (if appropriate), would be performed as an element of proposed demolition activities in accordance with a Demolition Work Plan to be submitted to the NYSDEC under separate cover.

♦ ♦ ♦

Comment 13

Any excavated areas that are backfilled with demolition debris should be covered with a layer of clean fill material.

Response 13

As indicated in Response 12, the excavated areas will not be backfilled with any demolition debris as part of the ICM. The need to import and place clean fill material will be discussed in the Demolition Work Plan and will be based on existing concrete analytical data, results of further characterization sampling, and anticipated future Site use (taking into consideration possible exposure pathways).

♦ ♦ ♦

Comments on Subsection 2.3 – ICM Summary Report

Comment 14

The final report should include the signature and stamp of a PE licensed in New York State.

Response 14

The ICM Summary Report will include a certification statement sealed and signed by a Professional Engineer registered in the State of New York.

♦ ♦ ♦

Comment 15

It should also include a summary of the air monitoring results.

Response 15

The ICM Summary Report will include a summary of the air monitoring activities and corresponding results. Air monitoring logs summarizing hourly particulate level and PID readings will be included as an appendix to the report.

♦ ♦ ♦

We trust that the above responses will be acceptable to the NYSDEC and we are prepared to implement the proposed ICM activities shortly following NYSDEC approval. I will contact you later this week to discuss any comments on the ICM Work Plan Modification above. In the meantime, please do not hesitate to contact Mr. Joel E. Robinson of Bayer at (412) 777-4871 [joel.robinson@ bayermaterialscience.com] or the undersigned at (315) 446-2570 (ext. 441) [JCB@ BBL-inc.com] if you have any questions or require additional information.

Sincerely,

BLASLAND, BOUCK & LEE, INC.

John C. Brussel

John C. Brussel, P.E.
Sr. Engineer I

JCB/mbg
Enclosures

cc: Ms. Katy Murphy, New York State Department of Environmental Conservation – Region 1
Mr. Joel E. Robinson, Bayer MaterialScience LLC

5/9/2005

E-mail Correspondence from NYSDEC

Conditional Approval of the ICM Work Plan

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BLASLAND, BOUCK & LEE, INC.

engineers, scientists, economists

From: "Alicia Barraza" <aabarraz@gw.dec.state.ny.us>
To: <JCB@bbl-inc.com>
Date: 5/9/2005 4:51:03 PM
Subject: Re: Modification to ICM Work Plan: Bayer Hicksville Site

John -
I have reviewed Bayer's responses dated April 26, 2005. DEC approves the ICM Work Plan, with the condition that these two issues be satisfactorily addressed by Bayer.

(1) Response 1 (subsection 2.2.2 - UST Removal): If bedding material is discovered, it should be removed prior to sampling of bottom soil and disposed of accordingly.
(2) Response 2 (subsection 2.2.2): DEC is concerned that surface soils from this excavation area may contain PCBs, due to its proximity to Plant 1 where PCBs were found. Therefore, prior to on-site reuse as backfill material, the PCB concentration (if any) of excavated soils should be verified).

I will send out an approval letter next week. If you have any questions, please contact me by phone, as I will not be able to check my email for the next three days. Thanks.

Alicia

>>> "JOHN BRUSSEL" <JCB@bbl-inc.com> 4/26/2005 4:29:23 PM >>>
Alicia:

On behalf of Bayer MaterialScience, please find the attached letter that modifies the ICM Work Plan for the above-referenced site. The letter is being submitted in response to the NYSDEC comments contained in your e-mail correspondence dated 4/25/05. A hard-copy of the letter will follow via U.S. mail.

Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.
Senior Engineer I
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

Tel: (315) 446-2570 (ext. 441)
Fax: (315) 449-4111
JCB@BBL-inc.com

CC: <joel.robinson@bayermaterialscience.com>, <JM@bbl-inc.com>, "Katy Murphy" <khmurphy@gw.dec.state.ny.us>

5/17/2005
Letter from NYSDEC

Conditional Approval of the ICM Work Plan

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Hazardous Waste & Radiation Management
625 Broadway, Albany, NY 12233-7258
Phone: (518) 402-8594 • **FAX:** (518) 402-9025
Website: www.dec.state.ny.us

Denise M. Sheehan
Acting
Commissioner

May 17, 2005

Mr. Joel E. Robinson
Bayer MaterialScience LLC
100 Bayer Road
Pittsburgh, PA 15205-9741

Dear Mr. Robinson:

Re: Bayer Polymers LLC, Hicksville, NY, USEPA ID No. NYD002920312;
Interim Corrective Measure (ICM) Work Plan, dated April 2005 and
Modifications to ICM Work Plan, dated April 26, 2005

The New York State Department of Environmental Conservation (Department) has reviewed the ICM Work Plan and modifications referenced above. Bayer submitted modifications to the ICM Work Plan in response to the Department's comments contained in an email correspondence dated April 25, 2005. The Department approves the ICM Work Plan and modifications, with the condition that Bayer satisfactorily address these two issues discussed in the modification letter of April 26, 2005.

1. Comments on Subsection 2.2.2 - UST Removal; Response 1
   If bedding material is discovered, it should be removed prior to sampling of the bottom soil and disposed of accordingly.
2. Comments on Subsection 2.2.2) - UST Removal; Response 2
   The Department is concerned that surface soils from this excavation area may contain PCBs, due to their proximity to Plant 1 where PCBs were previously found. Prior to on-site reuse of these soils as backfill material, the PCB concentration of the excavated soil should be verified.

Upon implementation of ICM work, please submit to the Department a schedule of activities. If you have any questions, please contact me at (518) 402-8594.

Sincerely,

Alicia Barraza

Alicia Barraza
Environmental Engineer
Hazardous Waste Engineering Eastern Section

cc: J. Reidy, EPA Region II
Lani Rafferty, NYSDOH

6/1/2005
E-mail Correspondence to NYSDEC

ICM Schedule

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From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us
Date: 6/1/2005 8:36:33 PM
Subject: ICM Schedule: Bayer MaterialScience - Hicksville, NY Site (NYD002920312)

Alicia:

BBL's affiliated remedial management and construction company, BBL Environmental Services, Inc. (BBLES), was awarded the contract yesterday to implement proposed ICM activities at the above-referenced site. The activities will be implemented in accordance with the *Interim Corrective Measure Work Plan* (BBL, April 2005) and related correspondence, including the NYSDEC's conditional approval letter dated 5/17/05.

BBLES is preparing to implement the activities beginning next week. We currently anticipate mobilizing various equipment to the site starting next Tuesday (6/7/05). A project kick-off/safety meeting is scheduled for Wednesday morning (6/8/05) at 8:00 a.m. The schedule for implementing the subsurface structure cleaning, UST removal, soil excavation, and related sampling activities is presented in the attached PDF file. The schedule is dependent on the weather, field conditions, and analytical results for verification soil samples and waste characterization samples.

Pursuant to Response 11 of BBL's April 26, 2005 letter to the NYSDEC, a BBLES site-specific Health and Safety Plan for the ICM activities is currently being finalized and will be sent to the NYSDEC tomorrow via overnight mail (for delivery Friday morning).

The NYSDEC is welcome to attend the kickoff meeting and to visit the site during the scheduled work activities. Please note that the NYSDEC will be notified if changes to the ICM activities are needed based on field conditions encountered. We will also notify the NYSDEC of any changes to the schedule.

Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.
Senior Engineer I
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6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

Tel: (315) 446-2570 (ext. 441)
Fax: (315) 449-4111
JCB@BBL-inc.com

CC: joel.robinson@bayermaterialscience.com; khmurphy@gw.dec.state.ny.us; KINGSLEY, DAVID; MOLINA, JOSEPH

Table 1

Bayer MaterialScience LLC
125 New South Road
Hicksville, New York

Project Schedule for ICM Activities

		June					July				August					September				October				November					December			
	Week	1	2	3	4	5	1	2	3	4	1	2	3	4	5	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4
Activity																																
ICM Implementation	***Dates***																															
Mobilization	6/07/05 - 6/13/05																															
Subsurface Structure Cleaning	6/08/05 - 6/15/05																															
Delineation/Verification Soil Sampling	6/09/05 - 6/10/05																															
Laboratory Analysis	6/13/05 - 6/15/05																															
Underground Storage Tank Removal	6/13/05 - 6/15/05																															
PCB-Impacted Soil Excavation	6/16/05 - 6/23/05																															
Characterization Sampling & Analysis	6/15/05 - 7/08/05																															
Offsite Transportation & Disposal	7/11/05 - 7/22/05																															
Additional Excavation (if needed)	6/27/05 - 7/08/05																															
Followup Verification Sampling/Analysis	7/05/05 - 7/15/05																															
Backfilling / ICM Site Restoration	7/18/05 - 7/22/05																															
Data Validation																																
ICM Summary Report																																
Prepare ICM Summary Report																																
Bayer Review / BBL Revision																																
Submit Final Report to NYSDEC																																
NYSDEC Review of Report																																
Respond to NYSDEC Comments (if any)																																
NYSDEC Review of Comment-Response																																
Report Approval																																

Notes:

1. Schedule is dependent on timeframe for NYSDEC review/approval.
2. Schedule assumes NYSDEC will provide timely responses concerning field decisions that require their input/approval.
3. Schedule assumes there will be no delays due to inclement weather or unforeseen field conditions.

6/13/2005
E-mail Correspondence to NYSDEC

ICM Progress Update

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JOHN BRUSSEL - Progress Update: Bayer - Hicksville ICM

From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us
Date: 6/13/2005 9:27 AM
Subject: Progress Update: Bayer - Hicksville ICM
CC: joel.robinson@bayermaterialscience.com; khmurphy@gw.dec.state.ny.us; KINGSLEY, DAVID; MOLINA, JOSEPH

Alicia:

Here's an update on the status of the ICM activities at the Bayer Hicksville site. We're a bit ahead of schedule at this point.

Activities Completed Last Week:

- Rolloff waste containers were delivered to the site.

- Subsurface structure cleaning was completed, except for cleaning of the Pilot Plant sump (AOC 45). Debris generated by the cleaning was containerized in one rolloff waste container.

- Delineation/verification soil sampling was completed in the former transformer area (AOC 39) and AOC 45. Samples were submitted to the laboratory for analysis/archive, as appropriate.

- The concrete transformer pad within the proposed excavation limits in AOC 39 was removed. Soils beneath and around the pad which exhibit PCBs >50 ppm were removed. The excavation is approximately 2 feet deep relative to the surrounding soil surface. The excavated concrete debris and PCB-impacted soils were containerized in one rolloff waste container.

- Soils were removed to identify the presence of the UST northwest of the former Plant 1 building in AOC 50. The soils were placed in a lined material staging area and sampled for PCBs. The top of the tank was uncovered approximately 2 - 2.5 feet below grade, and the tank dimensions length/diameter appear to be generally consistent with those presented in the ICM Work Plan. A threaded cap on top of the tank was removed, a faint odor was noticed (gasoline type), and it was determined that the tank was nearly full of water. The cap was placed back on the tank.

Activities Proposed for This Week:

- Field activities will resume on Wednesday, 6/15/05. Analysis of delineation/verification soil samples will continue.

- Following receipt of a tank remover's license from the Nassau County Fire Commission, BBLES will remove the liquids from the UST. The tank will be removed following the water removal and tank purging.

- Following receipt of PCB delineation/verification soil analytical results (anticipated on 6/13 and 6/14), BBLES will continue with the soil removal in AOC 39.

- Debris within AOC 45 will be removed, and a plan for addressing PCB-impacted soils beneath the sump will be presented to the NYSDEC.

Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

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6/16/2005
E-mail Correspondence to NYSDEC

Additional ICM Progress Update

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JOHN BRUSSEL - Additional Progress Update: Bayer - Hicksville ICM

From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us
Date: 6/16/2005 3:17 PM
Subject: Additional Progress Update: Bayer - Hicksville ICM
CC: joel.robinson@bayermaterialscience.com; khmurphy@gw.dec.state.ny.us; KINGSLEY, DAVID; MOLINA, JOSEPH

Alicia:

Pursuant to our telephone conversation this morning, please find the attached PDF files presenting preliminary PCB laboratory analytical results for the following samples recently collected at the above-referenced site as part of the ICM activities:

- *delineation/verification soil samples collected from the former Plant 1 Electrical Transformer Area (AOC 39) and the* vicinity of sump at the northwest corner of the former Pilot Plant (AOC 45); and
- a soil sample collected to characterize overburden soils removed from above the UST in AOC 50.

The PCB analytical results and actions taken based on the results are summarized below. Please note that the results are undergoing laboratory QC and are subject to change.

AOC 39 – Delineation/Verification Soil Analytical Results & Follow-Up Actions

Preliminary PCB analytical results for the delineation/verification soil samples collected from AOC 39 are as follows:

VS-39-1 (0-0.2'): 2.5 ppm
VS-39-1 (0.5-1.5'): 1.5 ppm
VS-39-2 (2.5-3.5'): 0.90 ppm
VS-39-3 (2.5-3.5'): 0.19 ppm
VS-39-4 (0-0.2'): 3.9 ppm
VS-39-4 (0.5-1.5'): 0.24 ppm
VS-39-4 (2.5-3.5'): 0.054 ppm
VS-DUP-1 [VS-39-4 (0.5-1.5')]: 0.26 ppm
VS-39-5 (0-0.2'): 1.0 ppm
VS-39-5 (0.5-1.5'): 0.032 ppm

The ICM Work Plan had called for collection of soil samples from the 0- to 0.2-foot and 0.5- to 1.5-foot depth intervals at locations VS-39-2 and VS-39-3. However, the soil excavation in AOC 39 was expanded a few feet to the west and south (from the limits shown in the ICM Work Plan) to coincide with the concrete foundation wall of the former Plant 1 building. Soils within the excavation limits were removed to depths of approximately 2 to 2.5 feet relative to the surrounding grade. As a result, no soils remained at the previously proposed sampling intervals along the south and west walls of the excavation. Accordingly, samples were instead collected from the 2.5- to 3.5-foot depth intervals. In addition, as a conservative measure, samples were collected from one additional delineation/verification soil sampling location (location VS-39-5) that was established approximately 10 feet east of sampling location VS-39-1.

As indicated above, the VS-39 sampling results are well-below the 50 ppm ICM cleanup objective. Therefore, no further excavation is planned to address the concentrations of PCBs remaining in AOC 39 to address PCBs.

As discussed this morning, elevated PID headspace screening results were obtained for soil samples collected from two sampling locations in AOC 39, including locations VS-39-1 (2-4') [>9999 ppm] and VS-39-2 (2-4') [232

ppm]. All other PID readings for the AOC 39 delineation/verification soil samples were 0.0 ppm. No staining or odors were noticed in any of the soil samples recovered at location VS-39-1 and VS-39-2, except for a possible faint odor and possible slight sheen in sample VS-39-2 (2-4'). Based on the elevated PID screening results, an additional soil boring was completed yesterday evening to further evaluate potential VOC-impacts in soil within the area. The new boring was completed at location VS-39-1R (immediately adjacent to previous sampling location VS-39-1) to a depth of 8 feet below ground surface (bgs). No odors were encountered in soil samples recovered from the new boring, and headspace screening results for all sampling intervals were 0.0 ppm. Headspace screening was performed using two separate PIDs. Based on the findings of the additional sampling activities, it is suspected that the elevated headspace readings obtained during the initial delineation/verification sampling may be due to an instrument error. For confirmation, the soil sample collected from sampling location VS-39-1R (2-4') was submitted for laboratory analysis for VOCs (plus TICs) using USEPA SW-846 Method 8260 on an expedited turnaround.

AOC 45 – Delineation/Verification Soil Analytical Results & Follow-Up Actions

Preliminary PCB analytical results for the delineation/verification soil samples collected from AOC 45 are as follows:

VS-45-1 (4.5-5.0'): 49 ppm
VS-45-1 (6.5-7.5'): 7.3 ppm
VS-DUP-2 [VS-45-1 (6.5-7.5')]: 12 ppm
VS-45-2 (4.5-5.0'): 2,200 ppm
VS-45-2 (6.5-7.5'): 5,800 ppm
VS-45-3 (4.5-5.0'): 0.65 ppm
VS-45-3 (6.5-7.5'): 0.47 ppm
VS-45-4 (4.5-5.0'): 38 ppm
VS-45-4 (6.5-7.5'): 14 ppm

Please note that all depths reported above for the AOC 45 samples are relative to the ground surface surrounding the Pilot Plant floor slab (the depths reported by the laboratory for samples VS-45-1, VS-45-2, and VS-45-7 are relative to the top of the soil surface immediately below the Pilot Plant floor slab).

As discussed this morning, PCBs were identified in the soil samples collected at locations VS-45-1 and VS-45-2 at concentrations near or above the 50 ppm ICM cleanup objective. In addition, visible staining was observed in soils encountered directly below the former concrete building floor slab at sampling location VS-45-2, and elevated PID headspace screening results (>9999 ppm) were obtained for soil samples collected from three sampling locations in AOC 45, including locations VS-45-2 (6-8'), VS-45-8 (6-8'), and VS-45-9 (6-8').

Based on the PCB laboratory analytical results for the AOC 45 delineation/verification soil samples, Bayer elected to have archived soil samples from the 4.5- to 5.0-foot and 6.5- to 7.5-foot depth intervals of sampling locations VS-45-5 through VS-45-10 analyzed for PCBs on an expedited turnaround basis. In addition, Bayer elected to complete four additional soil borings to collect additional samples for purposes of:

- further evaluating the extent of soils in the area that exhibit PCBs at concentrations exceeding 50 ppm; and
- evaluating whether VOCs are an actual constituent of interest in the area.

Soil borings were completed yesterday evening adjacent to previous sampling locations VS-45-2, VS-45-8, and VS-45-9 (the new sampling locations were designated VS-45-2R, VS-45-8R, and VS-45-9R) and at a new sampling location approximately 10 feet east of location VS-45-2 (location VS-45-11). The soil borings were completed to depths of approximately 14 to 16 feet bgs. PID headspace screening results for samples collected from the borings ranged from 0.0 ppm to 2.9 ppm, with the maximum at location VS-45-9R (8-10'). Two PIDs were used for the headspace screening. No visible staining or obvious odors were encountered in soil samples recovered from any of the additional borings. Based on the additional soil sampling activities, it was suspected that the elevated headspace readings obtained during the initial delineation/verification sampling may be due to an instrument error. Samples collected from yesterday evening's soil borings were selected for laboratory

analysis or archive as follows:

- *Locations VS-45-2R and VS-45-11:* Samples collected from five depth intervals (0-0.5', 6.8-7.3', 8.8-9.9', 10.3-12.3', and 12.3-14.3') at both of these sampling locations were submitted for laboratory analysis for PCBs. Samples collected from four depth intervals (0.5-2', 2-4', 4-6', and 14.3-16.3') at both borings were submitted for laboratory archive (for potential future PCB analysis, if needed). The intervals reported above are relative to the soil surface immediately below the concrete slab of the former Pilot Plant.

- *Location VS-45-9R:* The sample collected from the 8- to 10-foot depth interval at this sampling location was submitted for laboratory analysis for VOCs (plus TICs). This sampling location/interval was selected for VOC analysis because it exhibited the highest PID reading of yesterday's samples and it coincides with the area where elevated PID readings were previously obtained at location VS-45-9.

Laboratory analysis of the previously-archived soil samples and the samples collected yesterday from locations VS-45-2R, VS-45-9R, and VS-45-11 are anticipated by mid-next week. Following receipt of the additional analytical results, we'll contact OxyChem and the NYSDEC to discuss an approach for addressing the impacts in AOC 45.

AOC 50 – Overburden Soil Analytical Results & Follow-Up Actions

PCBs were detected in a composite sample collected to characterize the overburden soils removed from above the UST in AOC 50 (sample UST-AOC-50) at a concentration of 1.2 ppm. The overburden soils did not exhibit visible staining, and PID headspace screening results for samples of the overburden soils were all 0.0 ppm.

Pursuant to our conversation this morning, the overburden soils will be used as subsurface backfill material within the tank excavation once the tank is removed and soil removal/verification sampling activities are completed in accordance with the NYSDEC-approved ICM Work Plan and follow-up correspondence.

Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or me if you have any questions or require additional information.

-John

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6/16/2005
E-mail Correspondence to NYSDEC

Request to Backfill UST Excavation

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us
Date: 6/16/2005 10:10:05 PM
Subject: Request to Backfill UST Excavation: Bayer Hicksville - ICM

Alicia:

As discussed during our telephone conversation this afternoon, BBLES has completed the removal of the former gasoline UST located in AOC 50 at the Bayer Hicksville site and is seeking NYSDEC approval to backfill the UST excavation. Our request for approval is being made in accordance with Response 4 of BBL's April 26, 2005 letter responding to NYSDEC comments on the ICM Work Plan. There is no evidence of past release from the tank, as summarized below.

- No corrosion holes were noticed anywhere on the tank surfaces. The absence of corrosion holes is supported by observations that the tank was full of water until it was pumped yesterday afternoon to an onsite storage tank in preparation for the tank removal.

- Soils surrounding the tank were observed to be dry and did not exhibit visible staining, discoloration, or obvious odors. Bedding material was not observed below the tank.

- PID headspace screening results for all verification soil samples collected at the excavation limits were 0.0 ppm. Verification soil sampling was performed in accordance with Response 3 of an April 26, 2005 letter from BBL responding to NYSDEC comments on the ICM Work Plan. A total of 12 verification soils were collected from the excavation limits (including three each from the northern and southern sidewalls, one each from the eastern and western sidewalls, three from the bottom, and one from near a former dispensing line). The resulting UST excavation was approximately 7.5 feet wide, 18 feet long, and 6.5 feet deep.

- No sheens were observed on the surface of the soil-water mixture created via jar testing of each verification soil sample.

Based on these findings and the results of soil samples previously collected adjacent to the UST during the Phase II RFI, the collection of additional soil samples from the UST excavation for laboratory analysis does not appear to be needed. As summarized in the Phase II RFI Report contained in a letter from BBL to the NYSDEC dated January 5, 2005, no VOCs or SVOCs were identified in the AOC 50 soil samples at concentrations above the TAGM 4046 soil guidance values, except for benzo(a)pyrene which was identified in one sample at a concentration of 0.003 ppm above the guidance value.

BBLES is prepared to restore the excavation tomorrow, pending NYSDEC approval. The excavation will be restored by backfilling using the overburden soils removed from above the tank, and then by grading visually clean soils remaining around the excavation to remove deep depressions and generally meet the surrounding lines and grades.

Please let me know if this request to backfill is acceptable to the NYSDEC. Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.
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CC: joel.robinson@bayermaterialscience.com; khmurphy@gw.dec.state.ny.us; KINGSLEY, DAVID; MOLINA, JOSEPH

6/17/2005

E-mail Correspondence from NYSDEC

Conditional Approval to Backfill the UST Excavation

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

From: "Alicia Barraza" <aabarraz@gw.dec.state.ny.us>
To: <JCB@bbl-inc.com>
Date: 6/17/2005 10:13:59 AM
Subject: Re: Request to Backfill UST Excavation: Bayer Hicksville - ICM

John -
As we discussed on Friday morning(6/17), DEC has no problem with backfilling of the excavation with overburden soils. However, Bayer should ensure they are in compliance with Nassau County requirements prior to backfilling.

>>> "JOHN BRUSSEL" <JCB@bbl-inc.com> 6/16/2005 10:10:04 PM >>>
Alicia:

As discussed during our telephone conversation this afternoon, BBLES has completed the removal of the former gasoline UST located in AOC 50 at the Bayer Hicksville site and is seeking NYSDEC approval to backfill the UST excavation. Our request for approval is being made in accordance with Response 4 of BBL's April 26, 2005 letter responding to NYSDEC comments on the ICM Work Plan. There is no evidence of past release from the tank, as summarized below.

* No corrosion holes were noticed anywhere on the tank surfaces. The absence of corrosion holes is supported by observations that the tank was full of water until it was pumped yesterday afternoon to an onsite storage tank in preparation for the tank removal.

* Soils surrounding the tank were observed to be dry and did not exhibit visible staining, discoloration, or obvious odors. Bedding material was not observed below the tank.

* PID headspace screening results for all verification soil samples collected at the excavation limits were 0.0 ppm. Verification soil sampling was performed in accordance with Response 3 of an April 26, 2005 letter from BBL responding to NYSDEC comments on the ICM Work Plan. A total of 12 verification soils were collected from the excavation limits (including three each from the northern and southern sidewalls, one each from the eastern and western sidewalls, three from the bottom, and one from near a former dispensing line). The resulting UST excavation was approximately 7.5 feet wide, 18 feet long, and 6.5 feet deep.

* No sheens were observed on the surface of the soil-water mixture created via jar testing of each verification soil sample.

Based on these findings and the results of soil samples previously collected adjacent to the UST during the Phase II RFI, the collection of additional soil samples from the UST excavation for laboratory analysis does not appear to be needed. As summarized in the Phase II RFI Report contained in a letter from BBL to the NYSDEC dated January 5, 2005, no VOCs or SVOCs were identified in the AOC 50 soil samples at concentrations above the TAGM 4046 soil guidance values, except for benzo(a)pyrene which was identified in one sample at a concentration of 0.003 ppm above the guidance value.

BBLES is prepared to restore the excavation tomorrow, pending NYSDEC approval. The excavation will be restored by backfilling using the overburden soils removed from above the tank, and then by grading visually clean soils remaining around the excavation to remove deep depressions and generally meet the surrounding lines and grades.

Please let me know if this request to backfill is acceptable to the NYSDEC. Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.

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CC: "Katy Murphy" <khmurphy.StonyBrk.REG10@gw.dec.state.ny.us>

6/27/2005
E-mail Correspondence to NYSDEC

ICM Progress Update # 3

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us; khmurphy@gw.dec.state.ny.us
Date: 6/27/2005 10:08:02 PM
Subject: Progress Update #3: Bayer - Hicksville ICM

Alicia/Katy:

Preliminary PCB laboratory analytical results for all delineation/verification soil samples collected to date as part of the ICM at the above-referenced site are presented in Table 1 (click on the first attached PDF file). Based on the latest results, additional soil sampling is proposed to further delineate the extent of soil north and east of the Pilot Plant sump (AOC 45) containing PCBs at concentrations exceeding 50 ppm. Proposed sampling locations and sampling intervals are identified in Table 2 (second attached PDF file) and shown on Figure 1 (last PDF file).

Concrete coring will be completed at the proposed sampling locations tomorrow. Soil boring and sampling activities will begin this Wednesday (6/29/05) and are anticipated to continue through Friday (7/1/05). Samples recovered from the borings will be submitted to Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut for laboratory analysis or archive as indicated in Table 2. Samples selected for laboratory analysis will be analyzed in accordance with USEPA SW-846 Method 8082 on an expedited turnaround (2 to 3 days) for reporting of preliminary analytical results. The archived samples will be analyzed, if needed, based on the results for samples collected at adjacent locations and from overlying intervals (i.e., results >50 ppm).

Please note that preliminary VOC laboratory analytical results obtained for the additional delineation/ verification soil samples collected on 6/15/05 were all less than the NYSDEC soil guidance values presented in TAGM 4046. Based on these results, VOCs do not appear to be actual constituents of interest in AOC 45 or the Former Plant 1 Electrical Transformer Area (AOC 39). Therefore, no further sampling for VOCs in these areas is proposed.

The NYSDEC is welcome to visit the site to observe the proposed additional delineation/verification soil sampling activities. Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

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CC: joel.robinson@bayermaterialscience.com; KINGSLEY, DAVID; MOLINA, JOSEPH

TABLE 1
DELINEATION/VERIFICATION SOIL ANALYTICAL RESULTS FOR PCBs (ppm)

INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
AOC No. 39 - Former Plant 1 Electrical Transformer Area								
VS-39-1 (0-0.2')	<0.38	<0.73	<0.38	<0.38	0.57	<0.38	1.9	2.5
VS-39-1 (0.5-1.5')	<0.019	<0.037	<0.019	<0.019	0.036	<0.019	0.11	0.15
VS-39-2 (2.5-3.5')	<0.018	<0.035	<0.018	<0.018	0.012 J	<0.018	0.078	0.090 J
VS-39-3 (2.5-3.5')	<0.017	<0.034	<0.017	<0.017	0.029	<0.017	0.16	0.19
VS-39-4 (0-0.2')	<0.37	<0.72	<0.37	<0.37	<0.37	<0.37	3.9	3.9
VS-39-4 (0.5-1.5')	<0.020	<0.039	<0.020	<0.020	0.0098 J	<0.020	0.23	0.24 J
VS-DUP-1 [VS-39-4 (0.5-1.5')]	<0.019	<0.038	<0.019	<0.019	0.015 J	<0.019	0.24	0.26 J
VS-39-4 (2.5-3.5')	<0.017	<0.034	<0.017	<0.017	<0.017	<0.017	0.054	0.054
VS-39-5 (0-0.2')	<0.18	<0.35	<0.18	<0.18	0.17 J	<0.18	0.87	1.0 J
VS-39-5 (0.5-1.5')	<0.020	<0.039	<0.020	<0.020	0.0058 J	<0.020	0.026	0.032 J
AOC No. 45 - Sump in Northwest Corner of Pilot Plant								
VS-45-1 (6.8-7.3')	<1.7	<3.4	<1.7	<1.7	24	22	2.5	49
VS-45-1 (8.8-9.8')	<0.87	<1.7	<0.87	<0.87	4.6	2.7	<0.87	7.3
VS-DUP-2 [VS-45-1 (8.8-9.8')]	<0.87	<1.7	<0.87	<0.87	7.3	4.5	<0.87	12
VS-45-2 (6.8-7.3')	<170	<340	<170	<170	2,000	<170	<170	2,000
VS-45-2 (8.8-9.8')	<350	<680	<350	<350	5,300	<350	<350	5,300
VS-45-2R (0-0.5')	<0.36	<0.71	<0.36	<0.36	5.3	<0.36	<0.36	5.3
VS-45-2R (6.8-7.3')	<170	<330	<170	<170	610	<170	<170	610
VS-45-2R (8.8-9.8')	<180	<340	<180	<180	1,600	<180	<180	1,600
VS-45-2R (10.3-12.3')	<360	<690	<360	<360	3,900	<360	<360	3,900
VS-45 2R (12.3-14.3')	<170	<330	<170	<170	2,100	<170	<170	2,100
VS-45-2R (14.3-16.0')	<680	<1,300	<680	<680	2,300	<680	<680	2,300
VS-45-3 (4.5-5.0')	<0.036	<0.069	<0.036	<0.036	0.27	0.33	0.051	0.65
VS-45-3 (6.5-7.5')	<0.017	<0.034	<0.017	<0.017	0.19	0.23	0.048	0.47
VS-45-4 (4.5-5.5')	<1.9	<3.6	<1.9	<1.9	28	16	<1.9	44
VS-45-4 (6.5-7.5')	<0.87	<1.7	<0.87	<0.87	7.9	5.8	<0.87	14
VS-45-5 (4.5-5.0')	<0.88	<1.7	<0.88	<0.88	3.1	<0.88	<0.88	3.1
VS-45-5 (6.5-7.5')	<0.035	<0.068	<0.035	<0.035	0.18	0.15	<0.035	0.33
VS-45-6 (4.5-5.0')	<0.017	<0.034	<0.017	<0.017	0.068	0.057	<0.017	0.13
VS-45-6 (6.5-7.5')	<0.018	<0.034	<0.018	<0.018	0.039	0.038	<0.018	0.077
VS-45-7 (6.8-7.3')	<17	<34	<17	<17	1,500	1,300	<17	2,800
VS-45-7 (8.8-9.8')	<17	<33	<17	<17	1,700	1,500	<17	3,200
VS-45-8 (4.5-5.0')	<0.018	<0.034	<0.018	<0.018	0.035	0.025	<0.018	0.060
VS-45-8 (6.5-7.5')	<0.35	<0.68	<0.35	<0.35	1.0	<0.35	<0.35	1.0
VS-45-9 (4.5-5.0')	<0.035	<0.068	<0.035	<0.035	0.22	0.21	<0.035	0.43
VS-45-9 (6.5-7.5')	<0.018	<0.034	<0.018	<0.018	0.040	0.075	0.028	0.14
VS-45-10 (4.5-5.0')	<0.87	<1.7	<0.87	<0.87	2.4	1.1	<0.87	3.5
VS-45-10 (6.5-7.5')	<0.35	<0.67	<0.35	<0.35	1.20	0.77	<0.35	2.0
VS-45-11 (0.0-0.5')	<96	<190	<96	<96	270	<96	<96	270
VS-45-11 (6.8-7.3')	<180	<350	<180	<180	2,000	<180	<180	2,000
VS-45-11 (8.8-9.8')	<170	<330	<170	<170	1,100	<170	<170	1,100
VS-45-11 (10.3-12.3')	<170	<340	<170	<170	670	<170	<170	670
VS-45-11 (12.3-14.3')	<170	<330	<170	<170	640	<170	<170	640
VS-45-11 (14.3-16.0')	<670	<1,300	<670	<670	3,900	<670	<670	3,900

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. (BBL) during June 2005.
2. Samples were analyzed for polychlorinated biphenyls (PCBs) by Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut using United States Environmental Protection Agency (USEPA) SW-846 Method 8082, as referenced in the New York State Department of Environmental Conservation (NYSDEC) 2000 Analytical Service Protocol (ASP).
3. Depths reported for samples collected outside the former Pilot Plant footprint (at sampling locations VS-45-3, VS-45-4, VS-45-5, VS-45-6, VS-45-8, VS-45-9, and VS-45-10) are relative to the surrounding ground surface. Depths reported for samples collected within the former Pilot Plant footprint (at sampling locations VS-45-1, VS-45-2, VS-45-2R, VS-45-7, and VS-45-11) are relative to the top of the soil surface beneath the floor slab, which is approximately 2.: *feet higher than the surrounding ground surface.*
4. Concentrations presented in parts per million (ppm), which is equivalent to milligrams per kilogram (mg/kg).
5. < = Aroclors were not detected at a concentration exceeding the presented laboratory detection limit.
6. J = Indicates an estimated concentration.
7. VS-DUP = Blind Duplicate.
8. VS-45-2R = Revisit of sampling location VS-45-2.
9. Shaded values indicate that the total PCB concentration exceeds the 50 ppm action level established for the interim corrective measure.
10. Analytical results are preliminary and have not been validated.

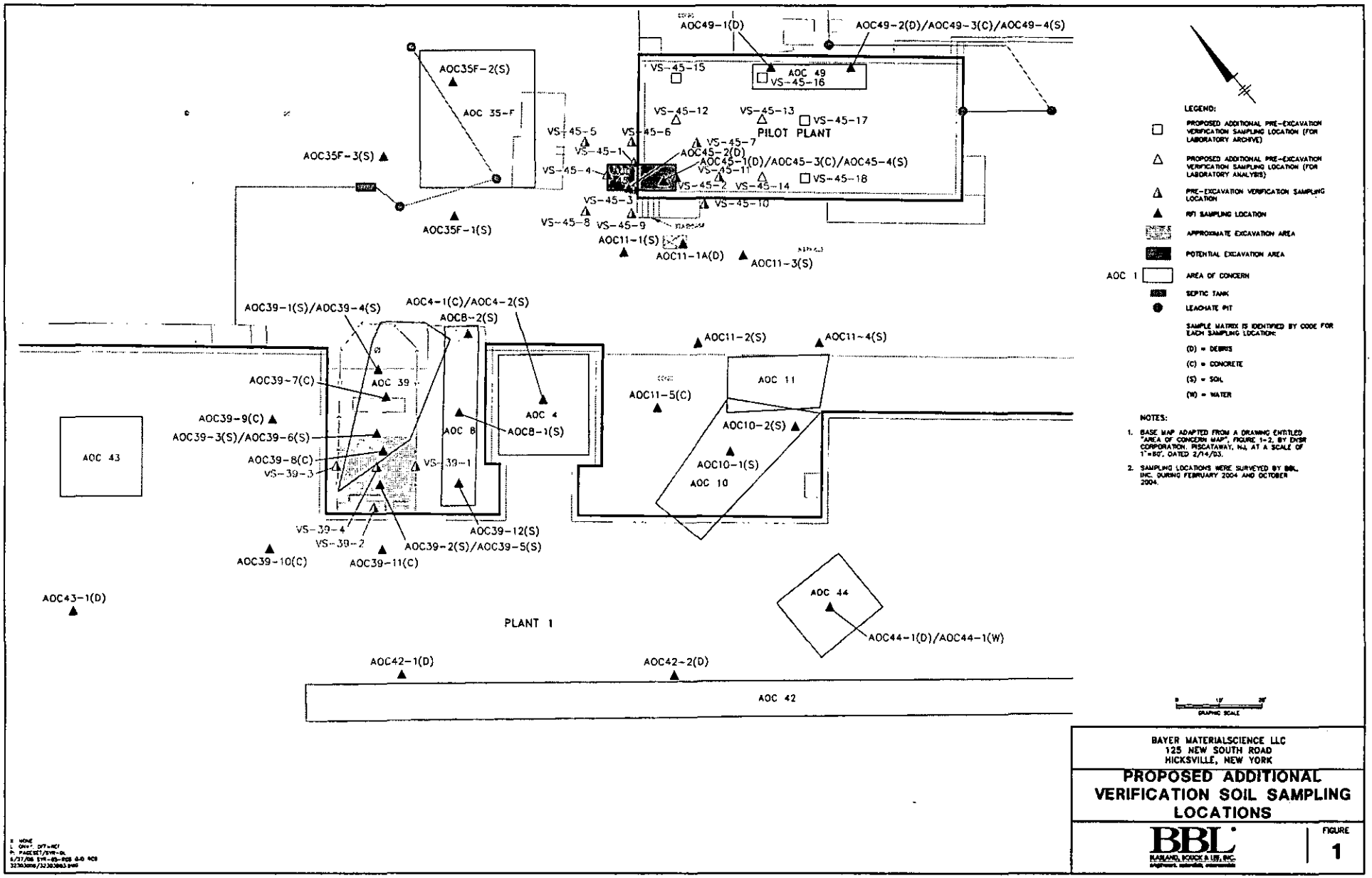
TABLE 2
PROPOSED ADDITIONAL DELINEATION/VERIFICATION SOIL SAMPLING PLAN

INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sampling Interval	Proposed Additional Sampling									
	Revisited Sampling Locations			New Sampling Locations						
	VS-45-2	VS-45-7	VS-45-11	VS-45-12	VS-45-13	VS-45-14	VS-45-15	VS-45-16	VS-45-17	VS-45-18
(0.0-0.5')	--	**Analyze**	--	**Analyze**	**Analyze**	**Analyze**	Archive	Archive	Archive	Archive
(0.5-2.0')	--	Archive	--	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(2.0-4.0')	--	Archive	--	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(4.0-6.0')	--	Archive	--	Archive		Archive	Archive	Archive	Archive	Archive
(6.8-7.3')	--	--	--	**Analyze**	**Analyze**	**Analyze**	Archive	Archive	Archive	Archive
(8.8-9.8')	--	--	--	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(10.3-12.3')	--	**Analyze**	--	**Analyze**	**Analyze**	**Analyze**	Archive	Archive	Archive	Archive
(12.3-14.3')	--	**Analyze**	--	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(14.3-16.0')	--	**Analyze**	--	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(16.0-18.0')	**Analyze**	Archive	**Analyze**	**Analyze**	**Analyze**	**Analyze**	Archive	Archive	Archive	Archive
(18.0-20.0')	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(20.0-22.0')	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(22.0-24.0')	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive	Archive
(24.0-26.0')	Archive	Archive	--	--	--	--	--	--	--	--
(26.0-28.0')	Archive	Archive	--	--	--	--	--	--	--	--
(28.0-30.0')	Archive	Archive	--	--	--	--	--	--	--	--
(30.0-32.0')	Archive	Archive	--	--	--	--	--	--	--	--

Notes:

1. Analyze = Sample will be submitted to Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut for laboratory analysis for polychlorinated biphenyls (PCBs) using United States Environmental Protection Agency (USEPA) SW-846 Method 8082, as referenced in the New York State Department of Environmental Conservation (NYSDEC) 2000 Analytical Services Protocol (ASP).
2. Archive = Sample will be submitted to STL-Conneticut and archived for potential future PCB analysis, if appropriate, based on sampling results for overlying or adjacent intervals/locations.
3. -- = Sample collection not proposed.



BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PROPOSED ADDITIONAL VERIFICATION SOIL SAMPLING LOCATIONS

BBL
BARAND, BOUCK & LEE, INC.

FIGURE
1

7/28/2005
E-mail Correspondence to NYSDEC

ICM Progress Update # 4

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

JOHN BRUSSEL - ICM Progress Update #4: Bayer - Hicksville, NY

From: JOHN BRUSSEL
To: aabarraz@gw.dec.state.ny.us; khmurphy@gw.dec.state.ny.us
Date: 7/28/2005 9:36 AM
Subject: ICM Progress Update #4: Bayer - Hicksville, NY
CC: AMELL, ANDREW; joel.robinson@bayermaterialscience.com; MOLINA, JOSEPH

Alicia/Katy:

Final laboratory analytical results for all ICM delineation/verification soil samples collected within the footprint of the former Pilot Plant building and submitted for PCB analysis (including the samples collected on June 29-30, 2005) are now available. The results are presented in Table 1 (first attached PDF file). Based on the results, additional ICM soil boring and sampling activities are proposed to:

- delineate the vertical extent of soils at sampling location VS-45-2 exhibiting PCBs at concentrations exceeding 50 ppm; and

- refine the horizontal delineation of PCB-impacted soils (with concentrations exceeding 50 ppm) around sampling locations VS-45-1, VS-45-2, VS-45-7, and VS-45-11.

As part of the proposed additional soil boring and sampling activities, soil borings will be completed at four locations within the footprint of the former Pilot Plant Building. The proposed boring locations are identified in Table 2 (second attached PDF file) and shown on Figure 1 (third attached PDF file).

Drilling at each proposed additional soil boring location will be completed using a conventional drill rig (Failing F7 or similar) equipped with 3-inch inside-diameter hollow-stem augers. The soil boring at location VS-45-2 will be advanced to the groundwater table (anticipated to be approximately 50 to 60 feet below ground surface), and the soil borings at the remaining three locations will each be advanced to a depth of 20 feet below the bottom of the concrete floor slab.

Soil samples will be collected continuously (beginning 24 feet below the bottom of the concrete floor slab at location VS-45-2 where continuous sampling was previously performed, and beginning immediately below the concrete floor slab at the remaining locations) and continuing to the depth of boring completion. The soil sample recovered from each split-spoon sampling interval will be visually-characterized (for color, texture, and moisture content) and will undergo headspace screening using a PID. Samples recovered from the intervals identified in Table 2 will be submitted for laboratory analysis for PCBs using USEPA SW-846 Method 8082. The analyses will be performed on a one week-turnaround for reporting of preliminary results. Samples from the remaining intervals will be archived for potential future extraction and analysis within allowable holding times, if needed.

As part of the sampling activities, various geotechnical data will be obtained to evaluate the engineering characteristics of the soil units encountered at the boring locations and facilitate design of an excavation support system. Standard penetration testing will be performed in accordance with American Society of Testing and Materials (ASTM) D-1586. In addition, selected soil samples will be submitted to a geotechnical laboratory for particle size (ASTM D-422), Atterberg limits (ASTM D-4318), and moisture content (ASTM D-2216) testing. In addition, one or more soil samples will be submitted to the laboratory for direct-shear testing (ASTM D-3080).

The proposed additional soil boring and sampling activities are scheduled to begin on August 2, 2005 and are anticipated to take approximately two days to complete. Following receipt of the analytical results, BBL will prepare an ICM Certification Report summarizing activities performed to remove accumulated debris from the manholes/catch basins, sumps, and floor trenches at the site; remove the former gasoline UST in AOC 50; excavate soils within AOC 39 (Former Plant 1 Electrical Transformer Area) that exhibited PCBs at concentrations exceeding 50 ppm; and delineate the extent of soils around the sump in the northwest corner of the Pilot Plant

(AOC 45) that exhibit PCBs at concentrations exceeding 50 ppm. We anticipate submitting the ICM Certification Report to the NYSDEC in late August/early September 2005.

Removal of the concrete floor slab and underlying soils in the vicinity of AOC 45 that exhibit PCBs at concentrations greater than 50 ppm will be performed as an element of the demolition activities following NYSDEC approval of the Demolition Work Plan (BBL, July 2005).

The NYSDEC is welcome to visit the site to observe the proposed additional delineation/verification soil sampling activities next week. Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.
Senior Engineer I
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

Tel: (315) 446-2570 (ext. 441)
Fax: (315) 449-4111
JCB@BBL-inc.com

TABLE 1
PCB DELINEATION/VERIFICATION SOIL SAMPLING RESULTS FOR
SAMPLES COLLECTED BENEATH THE FORMER PILOT PLANT (ppm)

INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sampling Interval	Sampling Locations											
	VS-45-1	VS-45-2	VS-45-7	VS-45-11	VS-45-12	VS-45-13	VS-45-14	VS-45-15	VS-45-16	VS-45-17	VS-45-18	VS-45-19
(0.0-0.5')	--	5.3	22	290	4.4	0.32	0.30	Archived	Archived	Archived	Archived	Archived
(0.5-2.0')	--	28	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(2.0-4.0')	--	Archived	Archived	58	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(4.0-6.0')	--	830	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(6.8-7.3')	71	660	9,300	2,200	0.56	0.048	0.024	Archived	Archived	Archived	Archived	Archived
(8.8-9.8')	7.3	2,000 [1,800]	14,000	1,100	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(10.3-12.3')	--	5,500 [4,100]	3,600	700 (830)	0.14	0.042	0.18	Archived	Archived	Archived	Archived	Archived
(12.3-14.3')	--	2,300	8,500	680	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(14.3-16.0')	--	2,400	7,200	4,000	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(16.0-18.0')	--	3,700 (5,400)	Archived	1,500	0.23	0.67	0.035	Archived	Archived	Archived	Archived	Archived
(18.0-20.0')	--	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(20.0-22.0')	--	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived
(22.0-24.0')	--	590	4.1	23	Archived	Archived	Archived	Archived	Archived	Archived	Archived	Archived

Notes:

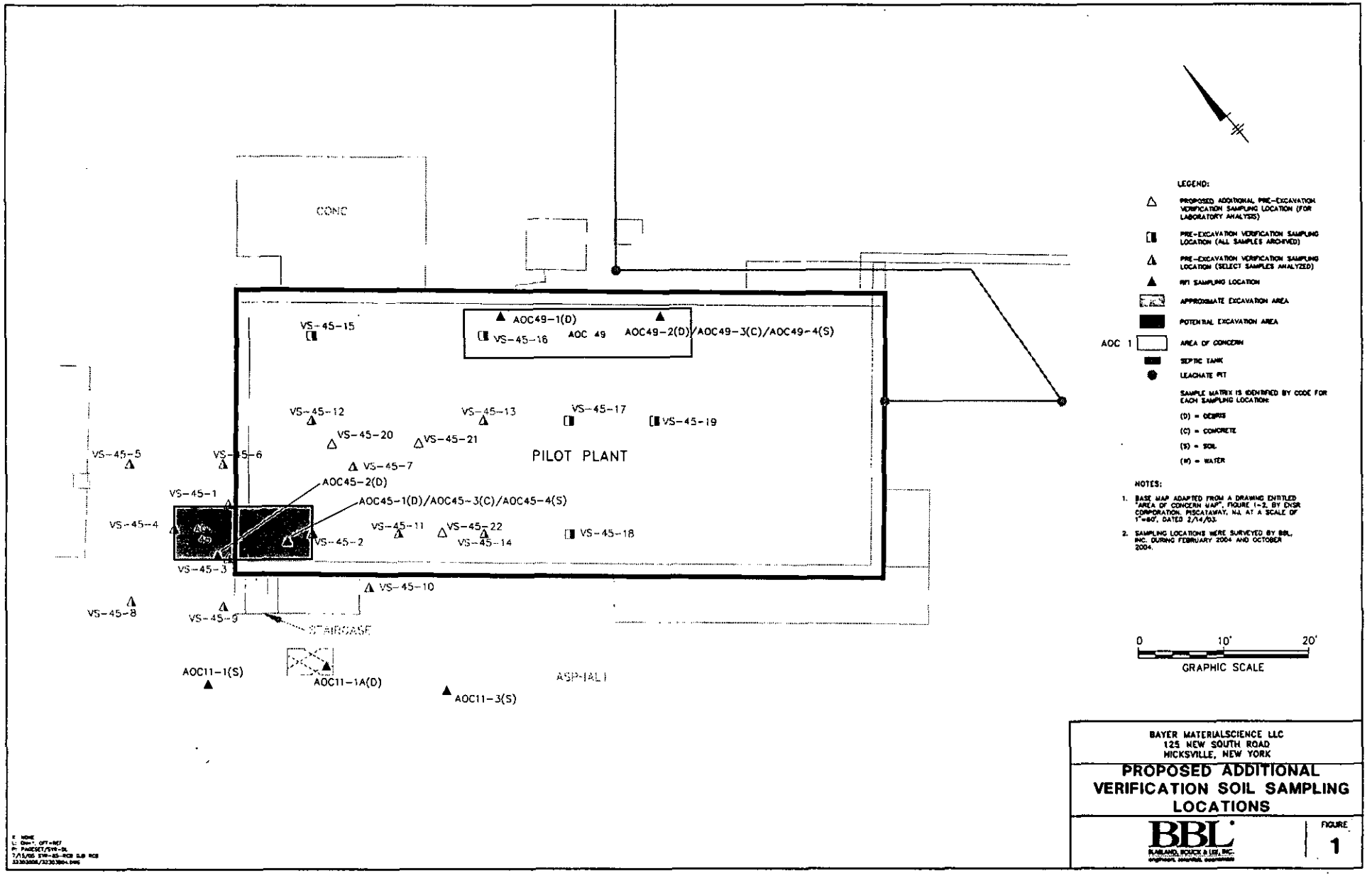
1. Results presented for samples collected beneath the former Pilot Plant building slab. Depths are relative to the top of the soil surface, beneath the floor slab.
2. Laboratory analysis for polychlorinated biphenyls (PCBs) was performed by Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut using United States Environmental Protection Agency (USEPA) SW-846 Method 8082, as referenced in the New York State Department of Environmental Conservation (NYSDEC) 2000 Analytical Services Protocol (ASP).
3. Archived = Sample was submitted to STL-Connecticut and archived for potential future PCB analysis, if appropriate, based on sampling results for overlying or adjacent intervals/locations.
4. -- = Sample not collected for archive or analysis.
5. ppm = parts per million.
6. Results shaded in gray exceed the 50 ppm ICM soil cleanup objective.
7. [ ] = second sample result.
8. () = Result for Blind Duplicate.

TABLE 2
PROPOSED ADDITIONAL DELINEATION/VERIFICATION SOIL SAMPLING PLAN

INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Proposed Sampling Location	Existing/ New Location	Location Description	Proposed Boring Depth	Proposed Sampling Interval (PCB Analysis)
VS-45-2	Existing	Immediately adjacent to previous soil boring VS-45-2/2R	Groundwater table (60 feet)	30-32' 34-36' 40-42' 50-52'
VS-45-20	New	Midpoint between locations VS-45-7 and VS-45-12	20 feet	0-0.5' 6.8-7.3' 10-12' 16-18'
VS-45-21	New	Midpoint between locations VS-45-7 and VS-45-13	20 feet	
VS-45-22	New	Midpoint between locations VS-45-11 and VS-45-14	20 feet	

Note:
Depths are referenced relative to the top of the soil surface immediately below the concrete floor slab.



BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PROPOSED ADDITIONAL VERIFICATION SOIL SAMPLING LOCATIONS

BBL
BLASLAND, BOUCK & LEE, INC.

FIGURE
1

8/1/2005

E-mail Correspondence from NYSDEC

Request for Additional Sampling

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

From: "Alicia Barraza" <aabarraz@gw.dec.state.ny.us>
To: <joel.robinson@bayermaterialscience.com>, <JCB@bbl-inc.com>
Date: 8/1/2005 2:48:38 PM
Subject: Bayer Hicksville

John & Joel -
I reviewed the letter and figure (Plate 3) which Joel emailed to me. At the area adjacent to the staircase, it appears that soil was excavated from depths of 10 ft to 2 ft, going from a southeast to northwest direction. Soil boring VS45-10 covers the southeast end of this excavation and 45-9 covers the northwest end. The results from VS45-10 and VS45-9 did not show any PCBs at 4.5 to 7.5 ft, where we would except to see PCBs. However, this leaves the area between VS45-9 and VS45-10 without any information. It is possible that the staircase is overlaying an area where PCBs are present, due to it proximity to VS45-2. At this time, it appears that it is not feasible to obtain a sample from directly underneath the staircase. Therefore, DEC will require a soil boring at the edge of the staircase, somewhere between the 10 and 3 foot contour lines (as shown in Plate 3). Soil samples should be analyzed at the same intervals as was done for VS45-9 and VS45-10 (i.e. 4.5'-5' and 6.5'-7.5'). The remaining intervals should be archived. The depth of the boring should be the same as for VS45-9 and VS45-10. I could not find any information on the depths of these two borings.

If you wish to discuss further, please give me a call.

Alicia

8/2/2005
E-mail Correspondence to NYSDEC

Proposed Additional Sampling

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

JOHN BRUSSEL - Re: Bayer Hicksville

From: JOHN BRUSSEL
To: Barraza, Alicia
Date: 8/2/2005 11:04 AM
Subject: Re: Bayer Hicksville
CC: AMELL, ANDREW; joel.robinson@bayermaterialscience.com; MOLINA, JOSEPH

Alicia:

Pursuant to your telephone conference call with Joel Robinson of Bayer and myself on 7/29/05 and your e-mail correspondence below, the following changes will be made to the proposed additional ICM delineation/verification soil sampling activities to be performed at the Hicksville site this week:

- The soil sample recovered from the 44- to 46-foot depth interval at soil boring location VS-45-2 will be submitted for laboratory analysis for PCBs (instead of being archived) to provide PCB data at regularly-spaced intervals to the depth of boring completion.

- The proposed soil borings at locations VS-45-20, VS-45-21, and VS-45-22 will each be completed to a depth of 22 feet (instead of 20 feet) below the bottom of the concrete floor slab. The revised boring depth corresponds to the depth where PCB concentrations decrease below 50 ppm at existing boring locations VS-45-7 and VS-45-11.

- A soil boring will be completed immediately south of the staircase along the south side of the former Pilot Plant building, midway between previous soil boring locations VS-45-9 and VS-45-10, to further evaluate the extent of PCB-impacted soils (>50 ppm) south of the former Pilot Plant sump. The proposed soil boring location (location VS-45-23) is shown on Figure 1. Soil boring VS-45-23 will be completed to a depth of approximately 20 feet below the surrounding grade, which will be consistent with the depth of proposed new borings VS-45-20, VS-45-21, and VS-45-22 (22 feet below the concrete floor slab at these three locations equates to approximately 19.7 feet below the surrounding grade). Soil samples recovered from the 4.5- to 5.5-foot and 6.5- to 7.5-foot depth intervals of boring VS-45-23 will be submitted for laboratory analysis for PCBs. Soil samples collected from the following intervals will be submitted to the laboratory and archived for potential future PCB analysis, if needed: 0-0.5, 0.5-2, 2-4, 8-10, and subsequent 2-foot intervals to the depth of boring completion.

The proposed boring depth and sampling intervals for each soil boring to be completed as part of the proposed additional ICM delineation/verification soil sampling activities are summarized in Table 2.

We trust that the above changes are acceptable to the NYSDEC. Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

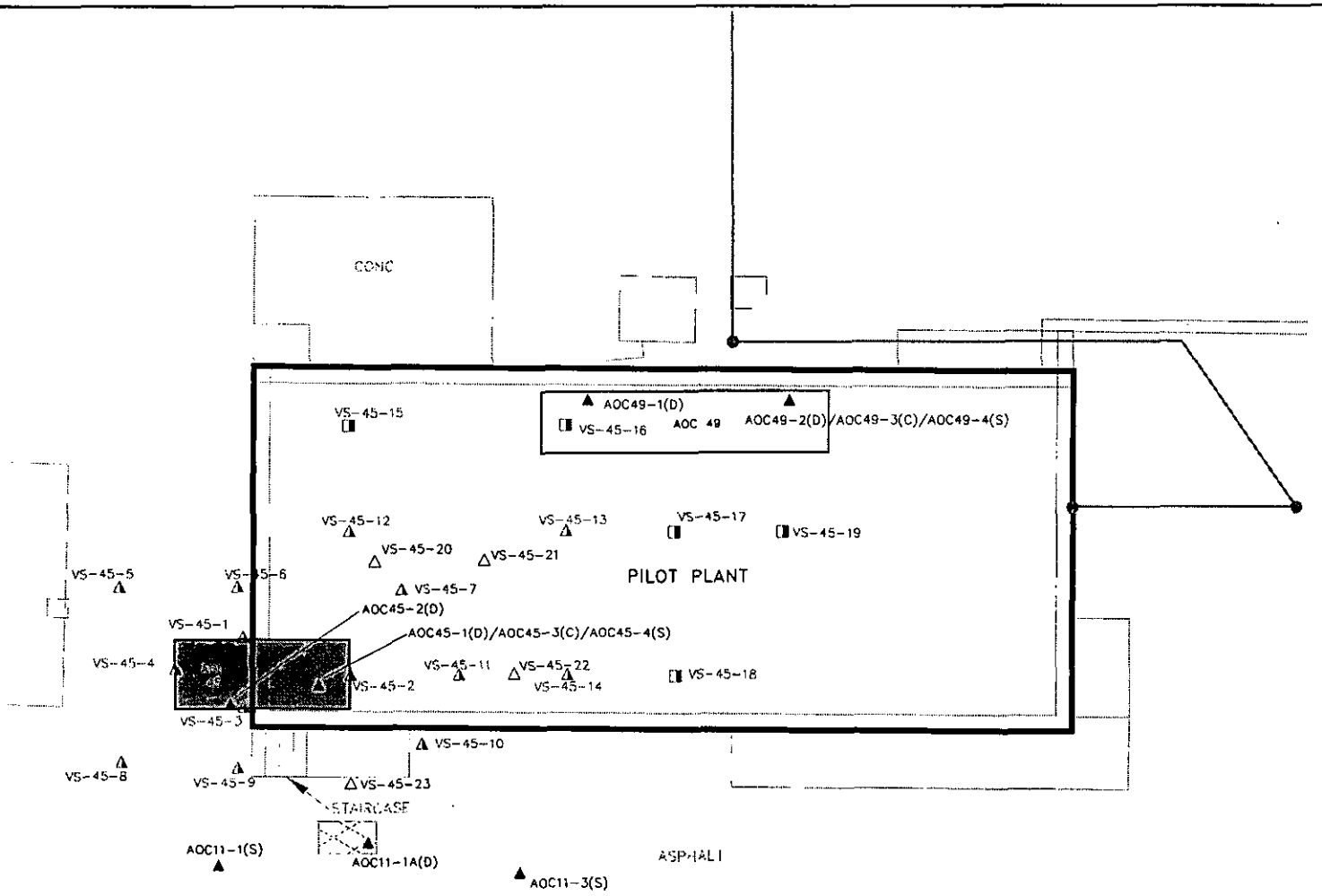
John C. Brussel, P.E.
Senior Engineer I
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

Tel: (315) 446-2570 (ext. 441)
Fax: (315) 449-4111
JCB@BBL-inc.com

>>> "Alicia Barraza" < aabarraz@gw.dec.state.ny.us > 8/1/2005 2:48 PM >>>
John & Joel -
I reviewed the letter and figure (Plate 3) which Joel emailed to me. At the area adjacent to the staircase, it appears that soil was excavated from depths of 10 ft to 2 ft, going from a southeast to northwest direction. Soil boring VS45-10 covers the southeast end of this excavation and 45-9 covers the northwest end. The results from VS45-10 and VS45-9 did not show any PCBs at 4.5 to 7.5 ft, where we would except to see PCBs. However, this leaves the area between VS45-9 and VS45-10 without any information. It is possible that the staircase is overlaying an area where PCBs are present, due to it proximity to VS45-2. At this time, it appears that it is not feasible to obtain a sample from directly underneath the staircase. Therefore, DEC will require a soil boring at the edge of the staircase, somewhere between the 10 and 3 foot contour lines (as shown in Plate 3). Soil samples should be analyzed at the same intervals as was done for VS45-9 and VS45-10 (i.e. 4.5'-5' and 6.5'-7.5'). The remaining intervals should be archived. The depth of the boring should be the same as for VS45-9 and VS45-10. I could not find any information on the depths of these two borings.

If you wish to discuss further, please give me a call.

Alicia



LEGEND:

- △ PROPOSED ADDITIONAL PRE-EXCAVATION VERIFICATION SAMPLING LOCATION (FOR LABORATORY ANALYSIS)
- ◨ PRE-EXCAVATION VERIFICATION SAMPLING LOCATION (ALL SAMPLES ARCHIVED)
- ◭ PRE-EXCAVATION VERIFICATION SAMPLING LOCATION (SELECT SAMPLES ANALYZED)
- ▲ RFI SAMPLING LOCATION
- APPROXIMATE EXCAVATION AREA
- POTENTIAL EXCAVATION AREA
- AOC 1 AREA OF CONCERN
- SEPTIC TANK
- LEACHATE PIT

SAMPLE MATRIX IS IDENTIFIED BY CODE FOR EACH SAMPLING LOCATION:

(D) = DEBRIS
(C) = CONCRETE
(S) = SOIL
(W) = WATER

NOTES:

1. BASE MAP ADAPTED FROM A DRAWING ENTITLED "AREA OF CONCERN MAP", FIGURE 1-2, BY ENSR CORPORATION, PISCATAWAY, NJ, AT A SCALE OF 1"=60', DATED 2/14/03.
2. SAMPLING LOCATIONS WERE SURVEYED BY BBL, INC. DURING FEBRUARY 2004 AND OCTOBER 2004.

0 10' 20'

GRAPHIC SCALE

BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PROPOSED ADDITIONAL VERIFICATION SOIL SAMPLING LOCATIONS

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE 1

TABLE 2
PROPOSED ADDITIONAL DELINEATION/VERIFICATION SOIL SAMPLING PLAN

INTERIM CORRECTIVE MEASURE
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Proposed Sampling Location	Existing/ New Location	Location Description	Proposed Boring Depth	Proposed Sampling Interval (PCB Analysis)
VS-45-2	Existing	Immediately adjacent to previous soil boring VS-45-2/2R	Groundwater table (60 feet)	30-32' 34-36' 40-42' 44-46' 50-52'
VS-45-20	New	Midpoint between locations VS-45-7 and VS-45-12	22 feet	0-0.5' 6.8-7.3' 10-12' 16-18'
VS-45-21	New	Midpoint between locations VS-45-7 and VS-45-13	22 feet	
VS-45-22	New	Midpoint between locations VS-45-11 and VS-45-14	22 feet	
VS-45-23	New	Immediately south of staircase between locations VS-45-9 and VS-45-10	20 feet	4.5-5' 6.5-7.5'

Notes:

1. Depths at proposed sampling locations within footprint of former Pilot Plant building (sampling locations VS-45-2, VS-45-20, VS-45-21, and VS-45-22) are referenced relative to the top of the soil surface immediately below the concrete floor slab, which is approximately 2.3 feet higher than the surrounding ground surface.
2. Depths at proposed sampling location VS-45-23 are relative to the surrounding ground surface outside the limits of the former Pilot Plant concrete floor slab.

8/2/2005
E-mail Correspondence from NYSDEC

Approval of Proposed Additional Sampling

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

From: "Alicia Barraza" <aabarraz@gw.dec.state.ny.us>
To: <JCB@bbl-inc.com>
Date: 8/2/2005 11:35:20 AM
Subject: Re: Bayer Hicksville

DEC agrees to these changes, as summarized in Table 2.

>>> "JOHN BRUSSEL" <JCB@bbl-inc.com> 8/2/2005 11:04:23 AM >>>
Alicia:

Pursuant to your telephone conference call with Joel Robinson of Bayer and myself on 7/29/05 and your e-mail correspondence below, the following changes will be made to the proposed additional ICM delineation/verification soil sampling activities to be performed at the Hicksville site this week:

- The soil sample recovered from the 44- to 46-foot depth interval at soil boring location VS-45-2 will be submitted for laboratory analysis for PCBs (instead of being archived) to provide PCB data at regularly-spaced intervals to the depth of boring completion.

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- A soil boring will be completed immediately south of the staircase along the south side of the former Pilot Plant building, midway between previous soil boring locations VS-45-9 and VS-45-10, to further evaluate the extent of PCB-impacted soils (>50 ppm) south of the former Pilot Plant sump. The proposed soil boring location (location VS-45-23) is shown on Figure 1. Soil boring VS-45-23 will be completed to a depth of approximately 20 feet below the surrounding grade, which will be consistent with the depth of proposed new borings VS-45-20, VS-45-21, and VS-45-22 (22 feet below the concrete floor slab at these three locations equates to approximately 19.7 feet below the surrounding grade). Soil samples recovered from the 4.5- to 5.5-foot and 6.5- to 7.5-foot depth intervals of boring VS-45-23 will be submitted for laboratory analysis for PCBs. Soil samples collected from the following intervals will be submitted to the laboratory and archived for potential future PCB analysis, if needed: 0-0.5, 0.5-2, 2-4, 8-10, and subsequent 2-foot intervals to the depth of boring completion.

The proposed boring depth and sampling intervals for each soil boring to be completed as part of the proposed additional ICM delineation/verification soil sampling activities are summarized in Table 2.

We trust that the above changes are acceptable to the NYSDEC. Please do not hesitate to contact Joel Robinson of Bayer at (412) 777-4871 or myself if you have any questions or require additional information.

-John

John C. Brussel, P.E.
Senior Engineer I
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

Tel: (315) 446-2570 (ext. 441)
Fax: (315) 449-4111
JCB@BBL-inc.com

>>> "Alicia Barraza" < aabarraz@gw.dec.state.ny.us > 8/1/2005 2:48 PM >>>
John & Joel -

I reviewed the letter and figure (Plate 3) which Joel emailed to me. At the area adjacent to the staircase, it appears that soil was excavated from depths of 10 ft to 2 ft, going from a southeast to northwest direction. Soil boring VS45-10 covers the southeast end of this excavation and 45-9 covers the northwest end. The results from VS45-10 and VS45-9 did not show any PCBs at 4.5 to 7.5 ft, where we would except to see PCBs. However, this leaves the area between VS45-9 and VS45-10 without any information. It is possible that the staircase is overlaying an area where PCBs are present, due to it proximity to VS45-2. At this time, it appears that it is not feasible to obtain a sample from directly underneath the staircase. Therefore, DEC will require a soil boring at the edge of the staircase, somewhere between the 10 and 3 foot contour lines (as shown in Plate 3). Soil samples should be analyzed at the same intervals as was done for VS45-9 and VS45-10 (i.e. 4.5'-5' and 6.5'-7.5'). The remaining intervals should be archived. The depth of the boring should be the same as for VS45-9 and VS45-10. I could not find any information on the depths of these two borings.

If you wish to discuss further, please give me a call.

Alicia

Appendix B

Daily Field Reports

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

CONSTRUCTION ACTIVITIES REPORT

Project: Bayer - Hicksville	File No. 32306.001
	Sheet No. 1 of 1 Sheets
Contractor: Royal / Contract No.:	Date 6/7/05
	Day of Week: S M (T) W T F S
Contractor's Supervisor: Lyel Grant	
Weather: Sunny, Hot, Humid	Temperature: 75 Min. 90 Max.

Contractor's Activities, Visitors, Remarks:

BBLES onsite & conducted Community Air Monitoring Program (CAMP) and work area air monitoring. BBLES supervising the cleaning of debris from structures. BBLES taking photographs of activities

Royal onsite conducting structure cleanings. Royal cleaned AOC-40 AOC-21B, AOC-43, & started cleaning AOC-42. Debris placed into rolloff

BBLES soil probe mobilized to the site. work scope & boring locations w/ sampling schedule reviewed with soil probe crew.

[over]

LABOR

Classification	Prime		A		B		C		D	
	No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
Operator (Beagie)	1	11								
Laborer (Matt)	1	11								
Laborer (Smiley)	1	~~8~~ 7								
Supervisor (Lloyd)	1	~~2.5~~								

EQUIPMENT

Description Make/Size/Model No.	Not Used	Prime		A		B		C		D	
		No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
20cy rolloff				1	1day						
30cy rolloff				1	1day						
Backhoe		1	9½								
Van		1	1day								
Box Van		1	1day								

A is: WTS C is:

B is: D is:

MATERIAL

Item No.	Description	Quantity	Item No.	Description	Quantity

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

CONSTRUCTION ACTIVITIES REPORT

Project: Bayer - Hickeville		File No. 32306.001 Sheet No. 1 of 1 Sheets
Contractor: Royal	Contract No.:	Date 6/8/05 Day of Week: S M T (W) T F S
Contractor's Supervisor: Smiley		
Weather: Sunny & Humid		Temperature: Min. 90°F Max.

Contractor's Activities, Visitors, Remarks: BBLES onsite to supervise activities & conducting air monitoring. BBLES obtained photographs to document activities. BBLES conducted sampling activities.

Royal cleaning designated structures. Structures AOC-38, AOC-46, AOC-11, cleaned, & started cleaning AOC-44

Royal uncovered AOC-50 UST. UST appears to be ~ 1,000 gallons & is in the location noted on the historical site figure. The UST contains water. No VOC concentrations (0.0ppm) detected w/in the soils above the UST. The upper soil excavated from the UST were staged on poly & covered.

Royal excavated a portion of AOC-39 and placed it into a roll off.

BBLES conducted soil boring work & sampling.

[over]

LABOR

Royal

Classification	Prime		A		B		C		D	
	No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
Supervisor	1	13								
Operator	1	13								
Laborer	1	13								

EQUIPMENT

Description Make/Size/Model No.	Not Used	Prime		A		B		C		D	
		No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
backhoe		1	1day								
van		1	1day								
box van		1	1day								
30yd rolloff				1	1day						
20yd rolloff				1	1day						

A is: WTS

C is:

B is:

D is:

MATERIAL

Item No.	Description	Quantity	Item No.	Description	Quantity

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

CONSTRUCTION ACTIVITIES REPORT

Project: Bayer - Hicksville.	File No.
	Sheet No. 1 of 1 Sheets
Contractor: Royal (not onsite today) / Contract No.:	Date 6/9/05
	Day of Week: S M T W (T) F S
Contractor's Supervisor: —	
Weather: Sunny, Humid	Temperature: Min. 88°F Max.

Contractor's Activities, Visitors, Remarks: BBLES negated all analysis of VS-39-2, VS-39-3 from 0' to 1.5' and instead analyze VS-39-2, and VS-39-5 from 2.5' to 3.5' intervals due to excavation activities

No soil remains in place at sidewalls at the current depth 2' to 2.5'.

BBLES installed soil borings at AOC-45

BBLES sampled structure cleaning debris, AOC-50 UST and AOC-39 for soil characterization.

Soil boring work concluded and BBLES demoed.

FCI dropped off 2, 30 cy roll offs

AOC-30 impoundment:

4 areas with staining, amber viscous liquid and white waxey solid present at surface. 1' diam. concrete inlet pipe at northwest end. wood stakes are 3'-4' from staining/product. Stained areas appear inline with the pvc inlet, but no product in cobbles sloping from pipe down to bottom of AOC-30.

[over]

LABOR

Classification	Prime		A		B		C		D	
	No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours

EQUIPMENT

Description Make/Size/Model No.	Not Used	Prime		A		B		C		D	
		No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
30 yd				1	1 day						
20 yd				1	1 day						
30 yd				1	½ day						
30 yd				1	½ day						

A is: WTS
C is:
B is:
D is:

MATERIAL

Item No.	Description	Quantity	Item No.	Description	Quantity

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

CONSTRUCTION ACTIVITIES REPORT

Project: Bayer - Hicksville	File No. 32306.001
	Sheet No. 1 of 1 Sheets
Contractor: Royal / Contract No.:	Date 6/15/05
	Day of Week: S M T (W) T F S
Contractor's Supervisor: —	
Weather:	Temperature: Min. Max.

Contractor's Activities, Visitors, Remarks:

BBLES and Royal on site. BBLES Set up air monitoring. Royal to excavate UST.

Additional Soil Borings at AOC-45 and AOC-39 to delineate PCB's, VOC's & SVOCs.

Royal built ramp to access AOC-45 slab. Removed liquid from UST and placing in temporary AST, approx. 600 gal.

BBLES inspected AOC-30 NAPL and found that the liquid/soft material discovered the previous week had solidified into a hard brittle substance.

While uncovering UST Royal made a hole in the abandoned gas pipe prior to knowing its Existance. Pipe was cut and removed from excavation. Royal uncovered East, west, and North sides of the UST.

BBLES installed Soil borings VS-45-2R/8R/9R/11R and VS-39-1R

[over]

LABOR

Classification	Prime		A		B		C		D	
	No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours

EQUIPMENT

Description Make/Size/Model No.	Not Used	Prime		A		B		C		D	
		No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
Backhoe											
2 pumps											
Van											
Generator											
1100 gal poly AST											

A is:	C is:
B is:	D is:

MATERIAL

Item No.	Description	Quantity	Item No.	Description	Quantity

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

CONSTRUCTION ACTIVITIES REPORT

Project: Bayer - Hicksville	File No. 32306-001
	Sheet No. 1 of 1 Sheets
Contractor: Royal / Contract No.:	Date 6/16/05
	Day of Week: S M T W (T) F S
Contractor's Supervisor: –	
Weather:	Temperature: Min. Max.

Contractor's Activities, Visitors, Remarks: UST Soil Screenings table attached
BBLES onsite for observations of cleaning
structures from last weeks work.
Royal continued to clean UST and placed sand and
tank bottoms into 55 gal drums and Staged onsite.
-Also pumped more water out of UST for a total
of 700 gal.
-Filled 8 drums with sand and tank bottoms from
AOC-50 UST. no holes or perforations noted.
-Tank is painted steel with some outer corrosion
present.
- Tank pit was observed to have no apparent
imported tank bedding material. Soils are orange
to brown sands and gravel.
- Royal Cleaned UST with brooms and absorbants
- Royal cleaned AOC-45, and set up for Confined entry
- Royal removed metal plate on west end of AOC-49
- Royal hammered out 3' concrete from west end of AOC-45
UST Soils can be used to backfill on the bottom of the UST pit.

[over]

LABOR

Classification	Prime		A		B		C		D	
	No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours

EQUIPMENT

Description Make/Size/Model No.	Not Used	Prime		A		B		C		D	
		No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours
Back hoe											
Box van											

A is:

B is:

C is:

D is:

MATERIAL

Item No.	Description	Quantity	Item No.	Description	Quantity

Location	Depth	PID	Jar Test / Observations
North 1	~4'	0.0	No odor. No sheen or NAPL
North 2	~4'	0.0	No odor. No sheen or NAPL
North 3	~4'	0.0	No odor. No sheen or NAPL
East	~4'	0.0	No odor. No sheen or NAPL
South 1	~4'	0.0	No odor. No sheen or NAPL
South 2	~4'	0.0	No odor. No sheen or NAPL
South 3	~4'	0.0	No odor. No sheen or NAPL
West	~4'	0.0	No odor. No sheen or NAPL
Bottom 1	~6.5'	0.0	No odor. No sheen or NAPL
Bottom 2	~6.5'	0.0	No odor. No sheen or NAPL
Bottom 3	~6.5'	0.0	No odor. No sheen or NAPL
Dispencer pipe	~2.5'	0.0	No odor. No sheen or NAPL

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

CONSTRUCTION ACTIVITIES REPORT

Project: Bayer - Hicksville	File No. 32306-001
	Sheet No. 1 of 1 Sheets
Contractor: Royal / Contract No.:	Date 6/17/05
	Day of Week: S M T W T F S
Contractor's Supervisor: —	
Weather: Sunny	Temperature: Min. 70°F Max.

Contractor's Activities, Visitors, Remarks: Structure Observations table attached

Royal removed remaining soil along northern wall of AOC-39. No staining observed.

Soil and concrete was loaded into approximate roll-offs

Royal cleared lower pit AOC-45. Final limits 20'x19'x2-12.5'

Royal loaded UST onto truck for disposal

Royal removed associated piping to AOC-50 UST and will also dispose of. Royal lined AOC-50 Excavation with poly then proceed to backfill using upper soils from UST removal.

Royal removed debris to 26" into utility pipe chase that is connected to the upper pit area of AOC-45 Debris remains to within the chase heading south with ~ 5" to 6" at the bottom.

Royal deconed lower pit / chase of AOC-45

deconed buckets of backhoe

Royal and BBLS off site.

[over]

LABOR

Classification	Prime		A		B		C		D	
	No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours

EQUIPMENT

Description Make/Size/Model No.	Not Used	Prime		A		B		C		D	
		No.	Hours	No.	Hours	No.	Hours	No.	Hours	No.	Hours

A is:	C is:
B is:	D is:

MATERIAL

Item No.	Description	Quantity	Item No.	Description	Quantity

OBSERVATIONS OF STRUCTURES CLEANED

AOC	Staining	Structure Integrity
AOC-40 WEST TRENCH	NO, BUT STAINING AT EAST END	NO VOIDS/CRACKS (DEBRIS BELOW CONCRETE PLUG)
AOC-40 EAST TRENCH	NO	EASTERN BOTTOM
AOC-21 B	NO	CONCRETE SURFACE IS GOOD. SUMP HAS EARTHEN BOTTOM
AOC-43	NO	EARTHEN BOTTOM OK. SMALLER 18"x18", EAST OF AOC
AOC-42	NO	15 AREAS WITH VOIDS AND OR CRACKS
AOC-46	NO, JUST RUST STAINS	CRACKS AND VOIDS AROUND PERIMETER 3" DIAM PVC PIPE PROTRUDING THRU
AOC-44	NO	TIGHT HOLDING WATER AFTER RAIN ON 6/17/05
AOC-11	SOME STAINING	TIGHT EXCEPT AROUND PIPE LEAVING CATCH BASIN. IT HOLDS WATER
AOC-49	NO	VOIDS AND CRACKS AT EAST AND WEST ENDS REMAINING IN COOD CONDITION
AOC-45 (LOWER)	HEAVY STAINS	GOOD, A FEW MINOR CRACKS
AOC-45 (UPPER PIT)	HEAVY STAINS	POOR - MISSING 65% OF BOTTOM
AOC-38	NO	GOOD CONDITION. NO SIGNIFICANT CRACKS AND NO VOIDS

exterior
interior

7/8/2005

Appendix C

Waste Manifests and Certificates of Disposal

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

NYG 4855347

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/23/03)

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: N Y D 0 0 2 9 2 0 3 1 2
Manifest Doc. No.: 5 5 5 4 7
2. Page 1 of 1
Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
Bayer MaterialScience, LLC
100 Bayer Road, Building 14
Pittsburgh PA 15205
4. Generator's Telephone Number ( )

A. NYG 4855347
B. Generator's ID 125 New South Road Hicksville NY 11801

5. Transporter 1 (Company Name): Freehold Cartage, Inc.
6. US EPA ID Number: N J D 0 5 4 1 2 6 1 8 4
C. State Transporter's ID ~~MF~~ ME 1040844
D. Transporter's Telephone (732) 462-1001

7. Transporter 2 (Company Name)
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM Chemical Services, LLC
1550 Balmer Road, PO Box 200
Model City NY 14107
10. US EPA ID Number: N Y D 0 4 9 8 3 6 6 7 9
G. State Facility ID SAME
H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, solid, Mixture 9, UN2315, II	0 0 1	CM	17000	K	EPA NONE / STATE B007
b.					EPA / STATE
c.					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above: a. b. c. d.

K. Handling Codes for Wastes Listed Above: a. L b. c. d.

15. Special Handling Instructions and Additional Information
a)VA7545 ERG#171
Accumulated for disposal 6/7/2005
17000 Kg soil/concrete c/w PCB
81596245
WTS#16861
Emergency Contact

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [signature] Signature: [signature] Mo. Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John Romanowicz Signature: [signature] Mo. Day Year: 06 27 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Mo. Day Year

19. Discrepancy Indication Space
Act Rec. 19233 K - qty est, gen resolved

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Fleck Signature: Michelle Fleck Mo. Day Year: 06 30 05

COPY 5—Generator—Mailed by TSD Facility

WASTE MANAGEMENT

CWM CHEMICAL SERVICES, LLC
1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

BAYER MATERIAL SCIENCE LLC
ATTN: ENVIRONMENTAL COMPLIANCE DEPT
NYD002920312
125 NEW SOUTH RD
HICKSVILLE NY 11801-5229

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from BAYER MATERIAL SCIENCE LLC on 06/30/05 as described on Hazardous Waste Manifest number NYG4855347 Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: VA7545
CWM Tracking ID: 8159624501
CWM Unit #: 1*0
Disposal Date: 06/30/05

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

RICHARD STURGES
DISTRICT MANAGER
Certificate # 280672
07/05/05

For questions please call our Customer Service Dept. at (800) 843-3604

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STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/23/03)

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. NYD002920312	Manifest Doc. No. 55365	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
Bayer MaterialScience, LLC
100 Bayer Road, Building 14
Pittsburgh PA 15205

4. Generator's Telephone Number ( )

5. Transporter 1 (Company Name): Freehold Cartage, Inc.
6. US EPA ID Number: NJD054126164

7. Transporter 2 (Company Name)
8. US EPA ID Number

9. Designated Facility Name and Site Address
CWM Chemical Services, LLC
1550 Balmer Road, PO Box 200
Model City NY 14107

10. US EPA ID Number: NYD049836679

A. NYG 4855365
B. Generator's ID: 125 New South Road, Hicksville NY 11801 MF 6/30
C. State Transporter's ID
D. Transporter's Telephone (732) 462-1001
E. State Transporter's ID: 1640949 ME — MF 6/30
F. Transporter's Telephone ( )
G. State Facility ID: SAME
H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, solid, mixture 9, UN2315, II	001	CM	17	K	EPA NONE / STATE B007
b.					EPA / STATE
c.					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a. c.
b. d.

K. Handling Codes for Wastes Listed Above
a. L c.
b. d.

15. Special Handling Instructions and Additional Information
a) VA7545 ERG#171
Accumulated for disposal 6/7/2005
Kg soil/concrete c/w PCB
815910207
WTS#16961
Emergency Contact:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name | Signature | Mo. Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Bill Burns | Signature | Mo. Day Year: 06 28 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. Day Year

FACILITY

19. Discrepancy Indication Space
Act Rec. 22045 K - qty est, gen resolved

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michelle Fleck | Signature: Michelle Fleck | Mo. Day Year: 06 30 05

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

GENERATOR

COPY 5—Generator—Mailed by TSD Facility

WASTE MANAGEMENT

CWM CHEMICAL SERVICES, LLC
1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

BAYER MATERIAL SCIENCE LLC
ATTN: ENVIRONMENTAL COMPLIANCE DEPT
NYD002920312
125 NEW SOUTH RD
HICKSVILLE NY 11801-5229

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from BAYER MATERIAL SCIENCE LLC on 06/30/05 as described on Hazardous Waste Manifest number NYG4855365 Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: VA7545
CWM Tracking ID: 8159626701
CWM Unit #: 1*0
Disposal Date: 06/30/05

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

RICHARD STURGES
DISTRICT MANAGER
Certificate # 280711
07/05/05

For questions please call our Customer Service Dept. at (800) 843-3604

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STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/23/03)

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NYD002920312 | Manifest Doc. No. 55383 | 2. Page 1 of 1 | Information within heavy bold line is not required by Federal Law.

GENERATOR

3. Generator's Name and Mailing Address
Bayer MaterialScience, LLC
100 Bayer Road, Building 14
Pittsburgh PA 15205

4. Generator's Telephone Number ( ) [illegible]

A. NYG 4855383

B. Generator's ID 135 New South Road Hicksville NY 11801

5. Transporter 1 (Company Name) Freehold Cartage, Inc.

6. US EPA ID Number NJD054128164

C. State Transporter's ID [illegible]

D. Transporter's Telephone (732) 462-1001

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM Chemical Services, LLC
1550 Balmer Road, PO Box 200
Model City NY 14107

10. US EPA ID Number NYD049836879

G. State Facility ID SAME

H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, solid, Mixture 9, UN2315, II	001	CM	2000	K	EPA NONE STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above		K. Handling Codes for Wastes Listed Above	
a.	c.	a. L	c.
b.	d.	b.	d.

15. Special Handling Instructions and Additional Information
a)VA7545 ERG#171
Accumulated for disposal 6/7/2005
2000 kg soil/concrete c/w PCB
81516292
WTS#15561
Emergency Contact:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[illegible]			

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[illegible]			

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Read 8147K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Lynn Piechowski	Lynn Piechowski	07	01	05

COPY 5—Generator—Mailed by TSD Facility

WASTE MANAGEMENT

CWM CHEMICAL SERVICES, LLC
1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

BAYER MATERIAL SCIENCE LLC
ATTN: ENVIRONMENTAL COMPLIANCE DEPT
NYD002920312
125 NEW SOUTH RD
HICKSVILLE NY 11801-5229

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from BAYER MATERIAL SCIENCE LLC on 07/01/05 as described on Hazardous Waste Manifest number NYG4855383 Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: VA7545
CWM Tracking ID: 8159629201
CWM Unit #: 1*0
Disposal Date: 07/01/05

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

RICHARD STURGES
DISTRICT MANAGER
Certificate # 280698
07/05/05

For questions please call our Customer Service Dept. at (800) 843-3604

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DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/23/03)

In ca... emergency or spill immediately call the National Response Center (800) ...802 and the NYS Department of Environmental Conservation (518) 457-...

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	NYD002820312
Manifest Doc. No.	55374
2. Page 1 of	1
Information within heavy bold line is not required by Federal Law.	

GENERATOR

3. Generator's Name and Mailing Address	Bayer MaterialScience, LLC 100 Bayer Road, Building 14 Pittsburgh PA 15205
4. Generator's Telephone Number	( )
A.	NYG 4855374
B. Generator's ID	125 New South Road Hicksville NY 11801
5. Transporter 1 (Company Name)	Freehold Cartage, Inc.
6. US EPA ID Number	NJD054126194
C. State Transporter's ID	0D 3942 E NJ
D. Transporter's Telephone	(732) 462-1001
7. Transporter 2 (Company Name)	
8. US EPA ID Number	
E. State Transporter's ID	
F. Transporter's Telephone	( )
9. Designated Facility Name and Site Address	CWM Chemical Services, LLC 1550 Balmer Road, PO Box 200 Model City NY 14107
10. US EPA ID Number	NYD049836679
G. State Facility ID	SAME
H. Facility Telephone	(716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, solid, Mixture 9, UN2315, II	001	CM	Est 17000	K	EPA NONE STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above		K. Handling Codes for Wastes Listed Above	
a.	c.	a. L	c.
b.	d.	b.	d.

15. Special Handling Instructions and Additional Information

a)VA7545 ERG#171

Accumulated for disposal 6/7/2005 SR 765467-2 7/5/05 10:30

17000 **Kg soil/concrete c/w PCB** NY NJ113

WTS#16981

Emergency Contact

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[signature]	[illegible]	[illegible]	[illegible]

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
Dennis J. Higgins	[signature]	06	29	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space

Actual [illegible] ~~33400 K~~ 15280 K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Angela Cadwalader	[signature]	07	05	05

COPY 5—Generator—Mailed by TSD Facility

WASTE MANAGEMENT

CWM CHEMICAL SERVICES, LLC
1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

BAYER MATERIAL SCIENCE LLC
ATTN: ENVIRONMENTAL COMPLIANCE DEPT
NYD002920312
125 NEW SOUTH RD
HICKSVILLE NY 11801-5229

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from BAYER MATERIAL SCIENCE LLC on 07/05/05 as described on Hazardous Waste Manifest number NYG4855374 Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: VA7545
CWM Tracking ID: 8159635701
CWM Unit #: 1*0
Disposal Date: 07/05/05

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

RICHARD STURGES
DISTRICT MANAGER
Certificate # 280757
07/06/05

For questions please call
our Customer Service Dept.
at (800) 843-3604

From everyday collection to environmental protection, Think Green® Think Waste Management.

Printed on 100% post-consumer recycled paper.

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

NYG 3363381

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

In case of emergency or spill immediately call the National Response Center (800) 424-880[illegible] the NYS Department of Environmental Conservation (518) 457-7362

GENERATOR

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. NYD002920312	Manifest Doc. No. 4[illegible]	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
BBL re:BAYER MATERIAL SCIENCE, LLC ATTN:WILLIAM POPHAM
295 WOODCLIFFE DRIVE, 3RD FLOOR SUITE 301
FAIRPORT, NY 15205

4. Generator's Telephone Number (585) [illegible]

A. NYG 3363381

B. Generator's ID 125 NEW SOUTH ROAD HICKSVILLE, NY 11801

5. Transporter 1 (Company Name) FREEHOLD CARTAGE INC.
6. US EPA ID Number NJD054126164
C. State Transporter's ID [illegible]
D. Transporter's Telephone (732) 462 1001

7. Transporter 2 (Company Name)
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER ROAD, PO BOX 200
MODEL CITY, NY 14107
10. US EPA ID Number NYD049836679
G. State Facility ID SAME
H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE LIQUID, N.O.S. (D028) 9, NA3082, III	001	TT	00730	G	EPA D028 STATE NONE
b.					EPA STATE
c					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a (L,E) MR UST WATER
b
c
d

K. Handling Codes for Wastes Listed Above
a e814 T
b
c
d

15. Special Handling Instructions and Additional Information
a)VC1759 ERG.#171,WTS #17593, SR#768902 8159737[illegible]
T[illegible] # 164

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[signature]	08	03	05

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[signature]	08	03	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Recd 742G

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	Eileen Carter	08	04	05

COPY 5—Generator—Mailed by TSD Facility

WASTE MANAGEMENT

CWM CHEMICAL SERVICES, LLC
1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

BAYER MATERIAL SCIENCE LLC
ATTN: ENVIRONMENTAL COMPLIANCE DEPT
NYD002920312
125 NEW SOUTH RD
HICKSVILLE NY 11801-5229

CERTIFICATE OF TREATMENT

CWM CHEMICAL SERVICES, L.L.C. located in MODEL CITY, NY has received waste material from BAYER MATERIAL SCIENCE LLC on 08/04/05 as described on Hazardous Waste Manifest Number NYG3363381 Sequence Number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was treated in the onsite waste treatment facility. The resulting effluent is discharged under the CWM SPDES permit.

Profile Number: VC1759
CWM Tracking ID: 8159737201
CWM Unit #: 1*0
Disposal Date: 08/04/05

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

RICHARD STURGES
DISTRICT MANAGER
Certificate # 282086
08/05/05

For questions please call our Customer Service Dept. at (800) 843-3604

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N.Y.D.0.0.2.9.2.0.3.1.2 | Manifest Doc. No. | 2. Page 1 of 1 | 8159775715

3. Generator's Name and Mailing Address
BBL re:Bayer MaterialScience, LLC
295 Woodcliffe Drive, 3rd Fl. Suite 301
Fairport NY 15205
Att: William Popham

4. Generator's Phone (585) 292-6715

125 New South Road
Hicksville NY 11801

5. Transporter 1 Company Name: FRANKS VACUUM TRUCK | 6. US EPA ID Number: NYD 982792814 | A. Transporter's Phone: 716 282 2132

7. Transporter 2 Company Name | 8. US EPA ID Number | B. Transporter's Phone

9. Designated Facility Name and Site Address
CWM Chemical Services, LLC
1550 Balmer Road, PO Box 200
Model City NY 14107

10. US EPA ID Number: N.Y.D.0.4.9.8.3.6.6.7.9

C. Facility's Phone: 716 754-8231

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. USDOT Non-regulated soil and sediment	8	DM	64.00	P
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a) (S) NH Soil/Grit
24

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
a)VC1760, WTS#17617, SR#769016

In case of Emergency, Call
Chemtrec
1-800-424-9300

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Joel E. Robinson | Signature: Joel E. Robinson | Month 08 | Day 10 | Year 05

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: LEE BOEHRINGER | Signature: Lee Boehringer | Month 08 | Day 10 | Year 05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Richard D'Angelo | Signature: Richard D'Angelo | Month 08 | Day 15 | Year 05

GENERATOR

TRANSPORTER

FACILITY

Printed by J.J. KELLER & ASSOCIATES, INC. Neenah, WI 54957-0368

ORIGINAL – RETURN TO GENERATOR

12-BLS-C5 Rev. 12/98

CWM CHEMICAL SERVICES, LLC
1550 Balmer Road
P.O. Box 200
Model City, NY 14107
(716) 754-8231
(716) 754-0211 Fax

BAYER MATERIAL SCIENCE LLC
ATTN: ENVIRONMENTAL COMPLIANCE DEPT
NYD002920312
125 NEW SOUTH RD
HICKSVILLE NY 11801-5229

CERTIFICATE OF DISPOSAL FOR NON-HAZARDOUS WASTE

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from BAYER MATERIAL SCIENCE LLC on 08/15/05 as described on Shipping Document number 8159775115 Sequence number 01.

Profile Number: VC1760
CWM Tracking ID: 8159775124
CWM Unit #: 1*0 thru 8*0
Disposal Date: 08/16/05

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

RICHARD STURGES
DISTRICT MANAGER
Certificate # 283773
09/09/05

For questions please call
our Customer Service Dept.
at (800) 843-3604

Roth Steel Corporation
800 W. Hiawatha Blvd. • Syracuse, New York

Institute of Scrap Recycling Industries, Inc.

Address Correspondence to
P.O. Box 1354
Syracuse, N.Y. 13201
Phone: 315-476-8431
Fax: 315-476-6070

September 14, 2005

Royal Enviromental

To Whom It May Concern:

Roth Steel received a steel diesel fuel tank today for recycling. The tank was destroyed by our Precision Shear.

Sincerely,

Mark Clement
Yard Foreman

Appendix D

Petroleum Bulk Storage Registration for Closure

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

BBL
ENVIRONMENTAL SERVICES, INC.
Remedial Management & Construction

Transmitted Via Federal Express

June 9, 2005

Mr. Ted Horishny
Nassau County Fire Commission
Office of the Fire Marshal
899 Jerusalem Avenue
P.O. Box 128
Uniondale, New York 11553-0128

Re: Bayer Material Science LLC
125 New South Road
Hicksville, New York
Tank Registration for Closure
BBLES Project #: 2302.32306 #5

Dear Mr. Horishny:

Pursuant to our recent conversations, please find the attached Registration Application for the permanent closure of a former gasoline underground storage tank (UST) located northeast of the former Plant 1 building at the above-referenced site. The UST was identified based on review of historic facility design drawings in connection with a RCRA Facility Investigation (RFI). The RFI was performed in accordance with plans approved by the New York State Department of Environmental Conservation (NYSDEC). As shown on a drawing titled "Site Plan" prepared by Rubber Corporation of America (Job No. 5309, Drawing 1), dated December 2, 1953, the tank is approximately 4-feet in diameter and 11 feet long. The top of the tank is reported to be approximately 2.5 feet below the ground surface. Based on dimensions shown on the drawing, the tank capacity is calculated to be 1,000 gallons. The presence of the tank was confirmed by an electromagnetic and ground-penetrating radar survey completed during the RFI.

No documentation of previous tank closure was identified in historic facility operations records. Therefore, it was determined that the tank would be closed via removal. The tank removal will be performed as part of an interim corrective measure (ICM) currently underway to address various environmental concerns at the site. The removal will be performed in accordance with Article XI Nassau County Public Health Ordinance, Section 12.2 and a NYSDEC-approved ICM Work Plan.

The tank is scheduled to be removed by BBL Environmental Services, Inc. (BBLES) following receipt of a Remover's Permit from your office. As discussed, BBLES is prepared to remove the tank on June 13 or 14, 2005 pending receipt of the permit.

We look forward to working with you on the tank closure. Please do not hesitate to contact me at (315) 446-2570 (ext. 441) if you have any questions or require additional information.

Sincerely,

BBL ENVIRONMENTAL SERVICES, INC.

John C. Brussel

John C. Brussel, P.E.
Sr. Engineer I

JCB/ams
Enclosures

cc: Mr. Joel E. Robinson, Bayer MaterialScience LLC (U.S. Mail)
Mr. Joseph Molina III, P.E., BBL Environmental Services, Inc. (U.S. Mail)
Mr. David R. Kingsley, BBL Environmental Services, Inc. (U.S. Mail)

Thomas R. Suozzi
County Executive

Thomas E. Tilley
Fire Marshal

OFFICE OF THE FIRE MARSHAL
COUNTY OF NASSAU
Registration Application for the Storage of Flammable/Combustible Liquids

FOR OFFICE USE ONLY
Loc. ID #
Fees Rcv'd
Date Rcv'd

CHECK ALL THAT APPLY TO YOUR FACILITY

TYPE OF STORAGE: TANK (S) [X] CONTAINER(S) [ ] OTHER

TYPE OF REGISTRATION: RENEWAL [ ] AMENDED [X] (ANY CHANGE IN THE INITIAL REGISTRATION APPLICATION) NEW [ ] (A FACILITY NOT PREVIOUSLY REGISTERED WITH THE NCFM)

PRODUCT USAGE: DISPENSING [X] MAJOR STORAGE FACILITY [ ] STATIONARY ENGINE [ ] INDUSTRIAL PROCESS [ ] OTHER

THIS SECTION PERTAINS TO THE FACILITY LOCATION

BUSINESS NAME: BAYER MATERIAL SCIENCE LLC

ADDRESS: 125 NEW SOUTH ROAD (Number Street) HICKSVILLE (City) 11801 (Zip)

INTERSECTION: NEW SOUTH ROAD & COMMERCE PLACE

PHONE: ( ) N/A

PROPERTY TAX CODE
SECTION 46
BLOCK N
LOT(S) 00300
SCHOOL DISTRICT # 017

THIS SECTION PERTAINS TO THE TANK OWNER (Permittee)

BUSINESS NAME: BAYER MATERIALSCIENCE LLC
(If not applicable leave blank, complete next line)

NAME: JOEL E. ROBINSON (Individual, Corporate Officer, Partner) MANAGER - SOLID WASTE & REMEDIATION PROGRAMS (Title) (Date of Birth)

LEGAL ADDRESS: 125 NEW SOUTH ROAD (Number Street) HICKSVILLE (City) NY (State) 11801 (Zip)

MAILING ADDRESS (If Different from Above): 100 BAYER ROAD, BLDG. 14 (Number & Street or PO Box) PITTSBURGH (City) PA (State) 15205 (Zip)

PHONE: (412) 777-4871 (Business) (800) 621-1994 (Emergency)

THIS SECTION PERTAINS TO THE FACILITY OPERATOR

BUSINESS NAME: BAYER MATERIALSCIENCE LLC
(If not applicable leave blank, complete next line)

NAME: JOEL E. ROBINSON (Individual, Corporate Officer, Partner) MANAGER - SOLID WASTE & REMEDIATION PROGRAMS (Title) (Date of Birth)

LEGAL ADDRESS: 125 NEW SOUTH ROAD (Number Street) HICKSVILLE (City) NY (State) 11801 (Zip)

MAILING ADDRESS (If Different from Above): 100 BAYER ROAD, BLDG. 14 (Number & Street or PO Box) PITTSBURGH (City) PA (State) 15205 (Zip)

PHONE: (412) 777-4871 (Business) (800) 621-1994 (Emergency)

THIS SECTION PERTAINS TO THE PROPERTY OWNER

BUSINESS NAME: BAYER MATERIALSCIENCE LLC
(If not applicable leave blank, complete next line)

NAME: JOEL E. ROBINSON (Individual, Corporate Officer, Partner) MANAGER - SOLID WASTE & REMEDIATION PROGRAMS (Title) (Date of Birth)

LEGAL ADDRESS: 125 NEW SOUTH ROAD (Number Street) HICKSVILLE (City) NY (State) 11801 (Zip)

MAILING ADDRESS (If Different from Above): 100 BAYER ROAD, BLDG. 14 (Number & Street or PO Box) PITTSBURGH (City) PA (State) 15205 (Zip)

PHONE: (412) 777-4871 (Business) (800) 621-1994 (Emergency)

I HEREBY AFFIRM UNDER PENALTY OF PERJURY, THAT THE INFORMATION PROVIDED ON THIS FORM AND ANY ATTACHED FORMS, ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE AS A CLASS A MISDEMEANOR TO SECTION 210.45 OF THE PENAL LAW.

PRINT NAME: Joel E. Robinson

TITLE: Mgr, Solid Waste & Remediat...

SIGNATURE: Joel E. Robinson

DATE: 6/8/05

Registration Application for the Storage of Flammable/Combustible Liquids
Instruction Sheet for Page 1 Only

General Instructions

The form must be completed and signed by the TANK OWNER, if the tank owner is a corporation, the principal of the corporation or a duly authorized representative of the corporation must sign the form. If the tank owner is a partnership or a sole proprietorship it must be signed by a general partner or proprietor.

Type or print in ink. Mail the completed form(s) to the Office of the Fire Marshal, attn. Industrial Division, as indicated in the cover letter.

The Tank Registration Application Storage Identification and Information form must be attached along with the proper fees required.

Complete all items on the form. All applications not filled out will be returned.

Item	Special Instructions
Tank Storage	Tanks: Any above or belowground, indoor or outdoor, flammable/combustible liquid storage tank. Container: Any vessel of 60 U.S. gallons or less capacity used for transporting or storing flammable/combustible liquids.
Type of Registration	Renewal: Any previously registered facility required by law to re-register all tank and/or container storage. Amended: Any registered facility where there is a change as to the information required on sheet 1 of this application. New: Any facility where the tank storage is under the jurisdiction of the Nassau County Fire Marshal and the facility has never been registered with this office.
Product Usage	Dispensing: Any facility where the primary function is to dispense flammable/combustible liquids into the fuel tank(s) of motor vehicles, vessels, aircraft or the filling of approved containers. Major Storage Facility: A facility where flammable/combustible liquids are received by tank vessel, pipe lines, tank car or tank vehicle and are stored in bulk for the purpose of distributing such liquids by tank vessel, pipe line, tank car, tank vehicle or container or for on-site use. Sationary Engine: Any combustion engine or turbine that is installed as a fixed facility. Such engine shall include such prime movers as internal combustion engine, gas turbine engine, rotary engine and free piston engine using liquid fuels or combination of fuels. Industrial Process: Any facility where the flammable/combustible liquid is stored, transferred, blended or in any manner used as part of a process required by the manufacturer to achieve an end product.
Facility Location	Business Name: Actual operating name of the business. Address: Actual site of operation. Intersection: Nearest cross street. Phone: On-site phone number. Section, Block, Lot: From county assesment. School District #: Two digit school number.
Tank Owner	Phone Emergency: A contact number where, in the event of an emergency, we can contact someone who is responsible and has the authorty to proceed with resolving the emergency.
Facility Operator	Phone Emergency: A contact number where, in the event of an emergency, we can contact someone who is responsible and has the authorty to proceed with resolving the emergency.
Property Owner	Phone Emergency: A contact number where, in the event of an emergency, we can contact someone who is responsible and has the authorty to proceed with resolving the emergency.
Signature	The form must be completed and signed by the TANK OWNER, if the tank owner is a corporation, the principal of the corporation or a duly authorized representative of the corporation must sign the form. If the tank owner is a partnership or a sole proprietorship it must be signed by a general partner or proprietor.

Thomas R. Suozzi
County Executive

Thomas E. Tilley
Fire Marshal

OFFICE OF THE FIRE MARSHAL
COUNTY OF NASSAU
Tank Registration Application
Storage Identification and Information

FOR OFFICE USE ONLY	
Date Application Received	Loc. ID #
Reviewed By	Date Reviewed
New ☐ Renewal ☐ Modify ☐	
Date Entered in Computer	Tank Registration Issued
Registration Number	Expiration Date

Facility Name: BAYER MATERIAL SCIENCE LLC.

Facility Address: 125 NEW SOUTH ROAD, HICKSVILLE, NY 11801

ACTION	UNIT TYPE	CONSTRUCTION MATERIAL	UNIT NO.	MATERIAL CURRENTLY STORED: FOR OFFICE USE Tank ID #	MATERIAL CURRENTLY STORED: TECHNICAL NAME OF CONTENTS	DESIGN CAPACITY (GALLONS)	INSTALLATION DATE	LAST TEST OR INSPECTION DATE	STATUS	INTERNAL PROTECTION	EXTERNAL PROTECTION	LEAK DETECTION	METHOD OF TANK FILL	METHOD OF PRODUCT TRANSFER	PIPING CONSTRUCTION	SECONDARY CONTAINMENT	UL NUMBER OR ACCEPTABLE EQUIVALENT
5	H	B	100		GASOLINE	1,000	NA	NA	R	9	4	5	2	1	1	5	NA

NA = NOT AVAILABLE

Tank Registration Application
Storage Identification and Information
Instruction Sheet for Page 2 Only

General Instructions

The Registration Application for the Storage of Flammable/Combustible Liquids form (Page 1) must be attached along with the proper fees required.

Type or print in ink. Mail the completed forms to the Office of the Fire Marshal, attn. Industrial Division, as indicated in the cover letter.

Complete all items on the form. Indicate at the bottom of the form the Page___of ___ information, the first page is # 2. All applications not filled out will be returned.

Item	Special Instructions
Facility Name	Enter the name of the Facility as it appears on the Registration Application for the Storage of Flammable/Combustible Liquids.
Facility Address	Enter the address of the Facility as it appears on the Registration Application for the Storage of Flammable/Combustible Liquids.
Action	Enter the Code number from the attached coding sheet.
Unit Type	Enter the Code letter from the attached coding sheet.
Construction Material	Enter the Code letter from the attached coding sheet.
U[redacted]umber	Enter the tank number from current tank registration form if not a new tank.
DOT #	Leave shaded area blank, for office use only.
Technical Name of Contents	Enter the name of the product used or to be used, ie. High Grade Gasoline, Diesel, Acetone, etc.
Design Capacity	Enter the nominal capacity of the tank.
Installation Date	Enter the date (MM/DD/YY) of the installation of the tank.
Last Test or Inspection	Enter the date (MM/DD/YY) of the last tank test.
Status	Enter Code letter from the attached coding sheet.
Internal Protection	Enter Code number from the attached coding sheet.
External Protection	Enter Code number from the attached coding sheet.
Piping Construction	Enter Code number from the attached coding sheet.
Method of Tank Fill	Enter Code number from the attached coding sheet.
Leak Detection	Enter Code number from the attached coding sheet.
Se[redacted]dary Contain	Enter Code number from the attached coding sheet.
Method of Product Transfer	Enter Code number from the attached coding sheet.
UL Number or Acceptable Equivalent	Enter the information as supplied by the tank manufacturer.

Tank Registration Application
Storage Identification and Information
Coding Sheet

Action
1 Re-Register Existing Tank
2 Register New Tank(Add on)
3 Register Existing Tank (Prev)
4 Abandon In Place (After New)
5 Remove (After New Install)

Status
A In Service
T Temporally Out of Service
R Remove (After New Install)
P Abandon In Place (After New)
S Proposed

Internal Protection
1 Internal Lining
2 None
3 Cathodic Protection
4 Physical Modification of Int.
5 Not Used
6 Not Used
7 Not Used
8 Other
9 Unknown

Piping Construction
1 Steel/Iron
2 Galvanized Steel
3 Wrapped Steel
4 Fiberglass
5 Cathodically Protected
6 Double Wall Fiberglass
7 Double Wall Steel
8 Other
9 Unknown

Unit Type
B Indoor Aboveground Horz.
C Indoor Aboveground Vert.
D Outdoor Aboveground Horz.
E Outdoor Aboveground Vert.
F Indoor Underground Horz.
G Indoor Underground Vert.
H Outdoor Underground Horz.
I Outdoor Underground Vert.
J Indoor Aboveground Spherical
K Outdoor Aboveground Spherical
L Indoor Underground Spherical
M Outdoor Underground Spherical

External Protection
1 Cathodic Protection (Non-Comp)
2 Painted (eg: Asphaltic)
3 Non-Corrodible Construction
4 None
5 Enveloped
6 Jacketed
7 Composite Tank Construction
8 Composite w/Cath Protection
9 Coated

Leak Detection
1 Electronic (Resistance/Optical)
2 Ground Vapor Monitoring
3 Site Well-Gnd Water Mon-Elect.
4 In-Tank Monitoring System
5 None
6 Site Well-Gnd Water Mon.-Man.
7 Mechanical
8 Other

Construction Material
B Steel
C Fiberglass w/Plastic
D Concrete
E Plastic
F Double Wall Fiberglass
G Double Wall Steel
H Coated Single Wall Steel
I Single Wall Steel w/Cathodic
J Sngl W Coat Stl w/Cathodic
K Dbl Wall Steel w/Cathodic
L Dbl Wall Coat Stl -Composite
M Dbl WC Stl - Comp w/Cath
N Dbl Wall JacketedSteel
O Dbl Wall Jkt Stl w/Cathodic
P Dbl Wall Jacketed Fiberglass
Q Concrete Encased SW Steel
R Concrete Encased SW F/G
S Con Encased SWS w/CP
T Concrete Encased DW Steel
U Concrete Encased DW F/G
V Concrete Encased DWS w/C
W SW Metallic (non-Ferrous)
X SW Metal (non-Ferr) w/CP
Y DW Metallic (non-Ferrous)
Z DW Metal (non-Ferr) w/CP

Secondary Containment
1 Dike, Rupture Basin
2 Vault
3 Double Wall Const.
4 Impervious Underlayment
5 None
6 Permeation Barrier
7 Dike w/Oil Water Septr
8 Containment Pad

Method of Tank Fill
1 Pressure Fill Using Pump
2 Gravity
3 Manual

Method of Product Transfer
1 Remote Pumping (Positive Press)
2 Suction (Negative Pressure)
3 Gravity
4 Loading Rack

Appendix E

Air Monitoring Logs

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Air Monitoring Log

Project: Bayer **Date:** 6/7/05

Monitoring Instruments: DataRAM & MultiRae

Air Monitor: DRK **Activity:** Structure Decontamination

Level of Protection: D

Time	Location	Instrument Reading: Dust	VOC	O_2 %	LEL/H_2S	Comments
13:37	work area	0.044	0.0	20.9%	0%	
14:14	↓	0.048	0.4	20.9%	0%	
16:05	↓	0.057	0.0	20.9%	0%	
16:10	↓	0.085	0.0	20.9%	0%	
16:20	↓	0.066	0.0	20.9%	0%	
16:45	↓	0.044	0.0	20.9%	0%	
CAMP Monitoring (Spot checks)		Dust	VOC	X	X	CAMP Monitoring
UPWIND	upwind					↓
15:28	↓	0.042	0.0			
16:10		0.042	0.0			
17:10		0.093	0.0			
—	downwind					
16:08	↓	0.042	0.0			
17:01		0.044	0.0			

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Air Monitoring Log

Project: Bayer - Hicksville **Date:** 6/8/05

Monitoring Instruments: DataRAM & multiRAE
Dust Trak & miniRAE

Air Monitor: DRK **Activity:** Structure Decon. & surficial soil removal

Level of Protection: D

Time	Location	Instrument Reading: Dust	VOC	O_2/CO	LEL/H_2S	Comments
6:35	work zone	0.062	0.9	20.6 / 1	0 / 0	
7:30		0.054	0.5	20.9 / 2	0 / 0	
8:35		0.032	0	20.9 / 0	0 / 0	
9:40		0.014	0	22.1 / 0	0 / 0	
10:38		0.029	0	22.3 / 0	0 / 0	
11:20		0.032	0	22.5 / 0	0 / 0	
12:00		0.057	0	22.6 / 0	0 / 0	
13:00		0.030	0	20.9 / 1	0 / 0	
13:22		0.098	0	20.9 / 1	0 / 0	
14:24		0.094	0	20.9 / 0	0 / 0	
15:00		0.026	0	20.9 / 0	0 / 1	
15:34		0.017	0	20.9 / 0	0 / 1	
15:58		0.017	0	20.9 / 0	0 / 1	
17:09		0.072	0	20.9 / 0	0 / 0	
CAMP Monitoring (Spot checks)						CAMP Monitoring
7:07 / 7:07	upwind / downwind	0.065 / 0.067	0.0 / 0.4			Spot checks
8:52 / 8:49		0.034 / 0.041	0.0 / 0.0			
9:41 / 9:24		0.035 / 0.040	0.0 / 0.0			
10:02 / —		0.061 / —	0.0 / 0.0			
13:15 / 13:05		0.057 / 0.098	0.0 / 0.0			
15:37 / 15:37		0.030 / 0.098	0.0 / 0.0			
17:39 / 17:35		0.089 / 0.085	low bat / low bat			unit shut off

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Air Monitoring Log

Project: Bayer - Hicksville, NY (AN 32306) **Date:** 6/15/05

Monitoring Instruments: DataRAM, MultiRae, DustTrak, MiniRae

Air Monitor: DRK **Activity:** UST Removal

Level of Protection: D

Time	Location	Instrument Reading: Dust	VOC	O_2 / CO	LEL / H_2S	Comments
8:05	work area	0.031	0.0	20.9 %	0 %	
9:12		0.094	0.0	20.9 %	0 %	
9:55		0.029	0.0	20.9 %	0 %	
10:45		0.089	0.0	20.9 %	0 %	
11:48		0.018	0.0	20.9 %	0 %	
12:45		0.000	0.2	20.9 %	0 %	
13:15		0.000	0.0	20.9 %	0 %	
15:25		0.000	0.0	20.9 %	0 %	
15:55		0.000	0.0	20.9 %	0 %	
17:03		0.000	0.0	20.9 %	0 %	
CAMP AIR MONITORING (spot checks)						CAMP MONITORING
7:35 / 7:49	upwind / downwind	0.027 / 0.035	0.0 / 0.0			(spot checks)
10:45 / 10:42		0.038 / 0.091	0.2 / 0.0			
10:48 / 10:49		0.038 / 0.099	0.1 / 0.0			
12:43 / 12:42		0.055 / 0.092	0.2 / 0.1			
14:55 / 14:09		0.035 / 0.031	0.2 / 0.0			
16:58 / 15:25		0.097 / 0.034	0.3 / 0.0			

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Air Monitoring Log

Project: Bayer - Hicksville (PN 32306) **Date:** 6/16/05

Monitoring Instruments: DataRAM, multi Rae, DustTrak, mini Rae

Air Monitor: DRK **Activity:** UST cleaning, structure Decontamination, Soil Excavation

Level of Protection: D

Time	Location	Instrument Reading: Dust	VOC	O2 / LEL / H_2S	Comments
8:00	work area	0.000	0.0	20.9 / 0 / 0 / 0	
9:10	↓	0.000	0.0	20.9 / 0 / 0 / 0	
9:44		0.000	0.0	20.9 / 0 / 0 / 0	
10:22		0.000	0.0	20.9 / 0 / 0 / 0	
11:27		0.000	0.0	20.9 / 0 / 0 / 0	
12:51		0.000	0.0	20.9 / 0 / 0 / 0	
13:36		0.000	0.0	20.9 / 0 / 0 / 0	
15:36		0.014	0.0	20.9 / 0 / 0 / 0	
16:18		0.000	0.0	20.9 / 0 / 0 / 0	
17:40	↓	0.000	0.0	20.9 / 0 / 0 / 0	
CAMP AIR MONITORING (spot checks)					CAMP MONITORING
- / 10:37	upwind / downwind	- / 0.055	- / 0.0		(spot checks)
12:54 / 12:49	↓	0.034 / 0.028	0.2 / 0.0		↓
17:51 / 17:44		0.052 / 0.037	0.3 / 0.0		

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Air Monitoring Log

Project: Bayer - Hicksville (PN 32306) **Date:** 6/17/05

Monitoring Instruments: DataRAM, multiRae, DustTrak, miniRae

Air Monitor: DRK **Activity:** Structure cleaning, Soil Excavation

Level of Protection: D

Time	Location	Dust Instrument	VOC Instrument	O_2 / CO Reading	LEL / H_2S Reading	Comments
7:40	work area	0.000	0.0	20.2 / 0	0 / 0	
8:05	↓	0.000	0.0	20.2 / 0	0 / 0	
9:08		0.000	0.0	20.2 / 0	0 / 0	
9:28		0.004	0.0	20.5 / 0	0 / 0	
10:36		0.000	0.0	20.3 / 0	0 / 0	
11:45		0.000	0.0	20.3 / 0	0 / 0	
CAMP AIR MONITORING (spot checks)		Dust		VOCs		
7:19 / 7:08	~~Point~~ upwind / downwind	0.020 / 0.018		0.0 / 0.0		
8:10 / 8:12		0.030 / 0.018		0.0 / 0.0		
9:13 / 9:00		0.018 / 0.014		0.0 / 0.0		
10:27 / 11:47		0.014 / 0.013		0.0 / 0.0		
12:25 / EE —		0.014 / —		0.0 / —		

Data Log Output

Upwind VOC Monitoring

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Instrument: MiniRAE 2000 (PGM7600) Serial Number: 002410
User ID: 00000000 Site ID: 00000004
Data Points: 16 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 05/11/2005 11:13

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	100.0	100.0	100.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/07/2005 12:59	0.0	0.0	0.0
2	06/07/2005 13:14	0.0	0.0	8.7L
3	06/07/2005 13:29	0.0	0.0	0.0
4	06/07/2005 13:44	0.0	0.0	0.0
5	06/07/2005 13:59	0.0	0.0	0.0
6	06/07/2005 14:14	0.0	0.0	0.0
7	06/07/2005 14:29	0.0	0.0	0.0
8	06/07/2005 14:44	0.0	0.0	0.0
9	06/07/2005 14:59	0.0	0.0	0.0
10	06/07/2005 15:14	0.0	0.0	0.1
11	06/07/2005 15:29	0.0	0.0	0.0
12	06/07/2005 15:44	0.0	0.0	0.0
13	06/07/2005 15:59	0.0	0.0	0.0
14	06/07/2005 16:14	0.0	0.0	0.0
15	06/07/2005 16:29	0.0	0.0	0.0
16	06/07/2005 16:44	0.0	0.0	0.0

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Air Monitoring Log

Project: Bayer - Hicksville (PN 32306) **Date:** 6/8/05

Monitoring Instruments: Mini RAE 2000

Air Monitor: DRK **Activity:**

Level of Protection: D

Time	Location	Instrument Reading	Comments
Data log is missing due to equipment malfunction			
Manually recorded "spot checks" are provided below.			
7:10	Upwind	0.0	
8:52	Upwind	0.0	
9:41	Upwind	0.0	
10:02	Upwind	0.0	
13:15	Upwind	0.0	
15:47	Upwind	0.0	
17:39	Upwind	-	Low battery Unit shut off

Instrument: MiniRAE 2000 (PGM7600) Serial Number: 002410
User ID: 00000000 Site ID: 00000008
Data Points: 42 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 06/15/2005 06:19

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	5.0	5.0	5.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date	Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/15/2005	07:54	0.0	0.0	0.1
2	06/15/2005	08:09	0.0	0.0	0.2
3	06/15/2005	08:24	0.0	0.0	0.1
4	06/15/2005	08:39	0.0	0.0	0.1
5	06/15/2005	08:54	0.0	0.1	0.2
6	06/15/2005	09:09	0.0	0.0	0.2
7	06/15/2005	09:24	0.0	0.1	0.2
8	06/15/2005	09:39	0.0	0.1	0.2
9	06/15/2005	09:54	0.0	0.1	0.2
10	06/15/2005	10:09	0.1	0.1	0.2
11	06/15/2005	10:24	0.1	0.1	0.2
12	06/15/2005	10:39	0.1	0.1	0.3
13	06/15/2005	10:54	0.1	0.1	0.2
14	06/15/2005	11:09	0.1	0.1	0.2
15	06/15/2005	11:24	0.0	0.1	0.3
16	06/15/2005	11:39	0.0	0.1	0.3
17	06/15/2005	11:54	0.0	0.1	0.6
18	06/15/2005	12:09	0.0	0.1	0.4
19	06/15/2005	12:24	0.0	0.1	0.4
20	06/15/2005	12:39	0.0	0.1	0.8
21	06/15/2005	12:54	0.1	0.2	0.4
22	06/15/2005	13:09	0.1	0.1	0.4
23	06/15/2005	13:24	0.1	0.2	0.6
24	06/15/2005	13:39	0.0	0.1	0.3
25	06/15/2005	13:54	0.1	0.1	0.2
26	06/15/2005	14:09	0.1	0.2	0.3
27	06/15/2005	14:24	0.1	0.1	0.3
28	06/15/2005	14:39	0.1	0.2	0.3
29	06/15/2005	14:54	0.0	0.2	0.5
30	06/15/2005	15:09	0.0	0.2	0.4
31	06/15/2005	15:24	0.0	0.2	0.8
32	06/15/2005	15:39	0.0	0.2	0.3
33	06/15/2005	15:54	0.1	0.2	0.4
34	06/15/2005	16:09	0.0	0.2	0.4
35	06/15/2005	16:24	0.1	0.2	0.4
36	06/15/2005	16:39	0.1	0.2	0.4
37	06/15/2005	16:54	0.1	0.2	0.3
38	06/15/2005	17:09	0.2	0.2	0.3
39	06/15/2005	17:24	0.1	0.2	0.4
40	06/15/2005	17:39	0.1	0.2	0.4
41	06/15/2005	17:54	0.2	0.2	0.4
42	06/15/2005	18:09	0.2	0.2	0.4

Instrument: MiniRAE 2000 (PGM7600) Serial Number: 002410
User ID: 00000000 Site ID: 00000012
Data Points: 37 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 06/16/2005 08:11

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	5.0	5.0	5.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date	Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/16/2005	08:27	0.0	0.1	0.3
2	06/16/2005	08:42	0.0	0.1	0.3
3	06/16/2005	08:57	0.0	0.1	0.6
4	06/16/2005	09:12	0.0	0.1	0.4
5	06/16/2005	09:27	0.0	0.1	1.0
6	06/16/2005	09:42	0.0	0.1	0.4
7	06/16/2005	09:57	0.0	0.1	0.7
8	06/16/2005	10:12	0.0	0.1	0.6
9	06/16/2005	10:27	0.1	0.1	0.2
10	06/16/2005	10:42	0.0	0.1	0.3
11	06/16/2005	10:57	0.0	0.2	0.6
12	06/16/2005	11:12	0.0	0.2	1.0
13	06/16/2005	11:27	0.0	0.2	0.7
14	06/16/2005	11:42	0.0	0.2	0.7
15	06/16/2005	11:57	0.0	0.2	0.4
16	06/16/2005	12:12	0.1	0.2	0.6
17	06/16/2005	12:27	0.1	0.2	0.4
18	06/16/2005	12:42	0.1	0.2	0.4
19	06/16/2005	12:57	0.0	0.2	0.6
20	06/16/2005	13:12	0.0	0.2	0.5
21	06/16/2005	13:27	0.0	0.2	0.4
22	06/16/2005	13:42	0.1	0.2	0.6
23	06/16/2005	13:57	0.2	0.2	0.3
24	06/16/2005	14:12	0.2	0.2	0.4
25	06/16/2005	14:27	0.2	0.2	0.5
26	06/16/2005	14:42	0.2	0.2	0.5
27	06/16/2005	14:57	0.1	0.2	0.5
28	06/16/2005	15:12	0.1	0.2	0.4
29	06/16/2005	15:27	0.2	0.3	0.4
30	06/16/2005	15:42	0.1	0.2	0.4
31	06/16/2005	15:57	0.2	0.3	0.4
32	06/16/2005	16:12	0.0	0.3	1.2
33	06/16/2005	16:27	0.0	0.2	0.9
34	06/16/2005	16:42	0.1	0.3	0.6
35	06/16/2005	16:57	0.2	0.2	0.4
36	06/16/2005	17:12	0.2	0.2	0.6
37	06/16/2005	17:27	0.0	0.3	0.8

Instrument: MiniRAE 2000 (PGM7600) Serial Number: 002410
User ID: 00000000 Site ID: 00000014
Data Points: 20 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 06/17/2005 07:15

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	5.0	5.0	5.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/17/2005 07:30	0.0	0.0	0.0
2	06/17/2005 07:45	0.0	0.0	0.0
3	06/17/2005 08:00	0.0	0.0	0.0
4	06/17/2005 08:15	0.0	0.0	0.0
5	06/17/2005 08:30	0.0	0.0	0.0
6	06/17/2005 08:45	0.0	0.0	0.0
7	06/17/2005 09:00	0.0	0.0	0.0
8	06/17/2005 09:15	0.0	0.0	0.7
9	06/17/2005 09:30	0.0	0.0	0.0
10	06/17/2005 09:45	0.0	0.0	0.0
11	06/17/2005 10:00	0.0	0.0	0.0
12	06/17/2005 10:15	0.0	0.0	0.0
13	06/17/2005 10:30	0.0	0.0	0.0
14	06/17/2005 10:45	0.0	0.0	0.0
15	06/17/2005 11:00	0.0	0.0	0.0
16	06/17/2005 11:15	0.0	0.0	0.0
17	06/17/2005 11:30	0.0	0.0	0.0
18	06/17/2005 11:45	0.0	0.0	0.0
19	06/17/2005 12:00	0.0	0.0	0.0
20	06/17/2005 12:15	0.0	0.0	0.0

Data Log Output

Downwind VOC Monitoring

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Instrument: MiniRAE 2000 (PGM7600) Serial Number: 001988
User ID: 00000000 Site ID: 00000002
Data Points: 17 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 05/17/2005 09:08

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	100.0	100.0	100.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/07/2005 12:43	0.0	0.0	0.0
2	06/07/2005 12:58	0.0	0.0	0.0
3	06/07/2005 13:13	0.0	0.0	0.0
4	06/07/2005 13:28	0.0	0.0	0.0
5	06/07/2005 13:43	0.0	0.0	0.0
6	06/07/2005 13:58	0.0	0.0	0.0
7	06/07/2005 14:13	0.0	0.0	0.0
8	06/07/2005 14:28	0.0	0.0	0.0
9	06/07/2005 14:43	0.0	0.0	0.0
10	06/07/2005 14:58	0.0	0.0	0.0
11	06/07/2005 15:13	0.0	0.0	0.0
12	06/07/2005 15:28	0.0	0.0	0.0
13	06/07/2005 15:43	0.0	0.0	0.0
14	06/07/2005 15:58	0.0	0.0	0.0
15	06/07/2005 16:13	0.0	0.0	0.0
16	06/07/2005 16:28	0.0	0.0	0.0
17	06/07/2005 16:43	0.0	0.0	0.0

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Air Monitoring Log

Project: Bayer - Hicksville **Date:** 6/8/05

Monitoring Instruments: MiniRAE 2000

Air Monitor: DRK **Activity:**

Level of Protection: D

Time	Location	Instrument Reading	Comments
Data log is missing due to equipment malfunction			
Manually recorded "spot checks" are provided below.			
7:07	Downwind	0.4	
8:49	Downwind	0.0	
9:24	Downwind	0.0	
13:05	Downwind	0.0	
15:37	Downwind	0.0	
17:35	Downwind	-	Low battery Unit shut off

Instrument: MiniRAE 2000 (PGM7600) Serial Number: 001988
User ID: 00000000 Site ID: 00000008
Data Points: 41 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 06/15/2005 06:29

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	5.0	5.0	5.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date	Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/15/2005	07:59	0.0	0.0	0.0
2	06/15/2005	08:14	0.0	0.0	0.0
3	06/15/2005	08:29	0.0	0.0	0.0
4	06/15/2005	08:44	0.0	0.0	0.0
5	06/15/2005	08:59	0.0	0.0	0.0
6	06/15/2005	09:14	0.0	0.0	0.0
7	06/15/2005	09:29	0.0	0.0	0.0
8	06/15/2005	09:44	0.0	0.0	0.0
9	06/15/2005	09:59	0.0	0.0	0.0
10	06/15/2005	10:14	0.0	0.0	0.0
11	06/15/2005	10:29	0.0	0.0	0.0
12	06/15/2005	10:44	0.0	0.0	0.1
13	06/15/2005	10:59	0.0	0.0	0.1
14	06/15/2005	11:14	0.0	0.0	0.0
15	06/15/2005	11:29	0.0	0.0	0.1
16	06/15/2005	11:44	0.0	0.0	0.1
17	06/15/2005	11:59	0.0	0.0	0.1
18	06/15/2005	12:14	0.0	0.0	0.1
19	06/15/2005	12:29	0.0	0.0	0.1
20	06/15/2005	12:44	0.1	0.1	0.2
21	06/15/2005	12:59	0.1	0.1	0.2
22	06/15/2005	13:14	0.1	0.1	0.2
23	06/15/2005	13:29	0.1	0.1	0.2
24	06/15/2005	13:44	0.0	0.0	0.1
25	06/15/2005	13:59	0.0	0.0	0.0
26	06/15/2005	14:14	0.0	0.0	0.0
27	06/15/2005	14:29	0.0	0.0	0.0
28	06/15/2005	14:44	0.0	0.0	0.0
29	06/15/2005	14:59	0.0	0.0	0.0
30	06/15/2005	15:14	0.0	0.0	0.0
31	06/15/2005	15:29	0.0	0.0	0.0
32	06/15/2005	15:44	0.0	0.0	0.0
33	06/15/2005	15:59	0.0	0.0	0.0
34	06/15/2005	16:14	0.0	0.0	0.1
35	06/15/2005	16:29	0.0	0.0	0.1
36	06/15/2005	16:44	0.0	0.1	0.2
37	06/15/2005	16:59	0.1	0.1	0.2
38	06/15/2005	17:14	0.1	0.2	0.3
39	06/15/2005	17:29	0.2	0.2	0.3
40	06/15/2005	17:44	0.3	0.4	0.5
41	06/15/2005	17:59	0.5	0.6	0.7

Instrument: MiniRAE 2000 (PGM7600) Serial Number: 001988
User ID: 00000000 Site ID: 00000010
Data Points: 37 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 06/16/2005 08:05

Measurement Type:		Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:		5.0	5.0	5.0
Low Alarm Levels:		5.0	5.0	5.0

Line#	Date	Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/16/2005	08:21	1.9	2.1	2.3
2	06/16/2005	08:36	1.7	1.9	2.3
3	06/16/2005	08:51	1.3	1.6	2.0
4	06/16/2005	09:06	1.0	1.2	1.5
5	06/16/2005	09:21	0.5	0.9	1.3
6	06/16/2005	09:36	0.0	0.2	0.5
7	06/16/2005	09:51	0.0	0.0	0.3
8	06/16/2005	10:06	0.0	0.0	0.0
9	06/16/2005	10:21	0.0	0.0	0.1
10	06/16/2005	10:36	0.0	0.5	2.3
11	06/16/2005	10:51	0.0	0.0	0.0
12	06/16/2005	11:06	0.0	0.0	0.0
13	06/16/2005	11:21	0.0	0.0	0.0
14	06/16/2005	11:36	0.0	0.0	0.0
15	06/16/2005	11:51	0.0	0.0	0.0
16	06/16/2005	12:06	0.0	0.0	0.0
17	06/16/2005	12:21	0.0	0.0	0.0
18	06/16/2005	12:36	0.0	0.0	0.0
19	06/16/2005	12:51	0.0	0.0	0.0
20	06/16/2005	13:06	0.0	0.0	0.0
21	06/16/2005	13:21	0.0	0.0	0.0
22	06/16/2005	13:36	0.0	0.0	0.0
23	06/16/2005	13:51	0.0	0.0	0.0
24	06/16/2005	14:06	0.0	0.0	0.0
25	06/16/2005	14:21	0.0	0.0	0.0
26	06/16/2005	14:36	0.0	0.0	0.0
27	06/16/2005	14:51	0.0	0.0	0.0
28	06/16/2005	15:06	0.0	0.0	0.0
29	06/16/2005	15:21	0.0	0.0	0.0
30	06/16/2005	15:36	0.0	0.0	0.0
31	06/16/2005	15:51	0.0	0.0	0.0
32	06/16/2005	16:06	0.0	0.0	0.0
33	06/16/2005	16:21	0.0	0.0	0.0
34	06/16/2005	16:36	0.0	0.0	0.0
35	06/16/2005	16:51	0.0	0.0	0.0
36	06/16/2005	17:06	0.0	0.0	0.0
37	06/16/2005	17:21	0.0	0.0	0.0

Instrument: MiniRAE 2000 (PGM7600) Serial Number: 001988
User ID: 00000000 Site ID: 00000011
Data Points: 20 Gas Name: Isobutylene Sample Period: 900 sec
Last Calibration Time: 06/17/2005 07:03

Measurement Type:	Min(ppm)	Avg(ppm)	Max(ppm)
High Alarm Levels:	5.0	5.0	5.0
Low Alarm Levels:	5.0	5.0	5.0

Line#	Date Time	Min(ppm)	Avg(ppm)	Max(ppm)
1	06/17/2005 07:19	0.0	0.0	0.0
2	06/17/2005 07:34	0.0	0.0	0.0
3	06/17/2005 07:49	0.0	0.0	0.0
4	06/17/2005 08:04	0.0	0.0	0.0
5	06/17/2005 08:19	0.0	0.0	0.0
6	06/17/2005 08:34	0.0	0.0	0.0
7	06/17/2005 08:49	0.0	0.0	0.0
8	06/17/2005 09:04	0.0	0.0	0.0
9	06/17/2005 09:19	0.0	0.0	0.0
10	06/17/2005 09:34	0.0	0.0	0.0
11	06/17/2005 09:49	0.0	0.0	0.0
12	06/17/2005 10:04	0.0	0.0	0.0
13	06/17/2005 10:19	0.0	0.0	0.0
14	06/17/2005 10:34	0.0	0.0	0.0
15	06/17/2005 10:49	0.0	0.0	0.0
16	06/17/2005 11:04	0.0	0.0	0.0
17	06/17/2005 11:19	0.0	0.0	0.0
18	06/17/2005 11:34	0.0	0.0	0.0
19	06/17/2005 11:49	0.0	0.0	0.0
20	06/17/2005 12:04	0.0	0.0	0.0

Data Log Output

Upwind Aerosol Monitoring

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TrakPro v3.20, Test: Test001, Date: 06/07/2005 12:38:44

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/07/2005	12:53:44	0.069
06/07/2005	13:08:44	0.065
06/07/2005	13:23:44	0.059
06/07/2005	13:38:44	0.053
06/07/2005	13:53:44	0.051
06/07/2005	14:08:44	0.049
06/07/2005	14:23:44	0.047
06/07/2005	14:38:44	0.047
06/07/2005	14:53:44	0.046
06/07/2005	15:08:44	0.045
06/07/2005	15:23:44	0.043
06/07/2005	15:38:44	0.042
06/07/2005	15:53:44	0.042
06/07/2005	16:08:44	0.043
06/07/2005	16:23:44	0.041
06/07/2005	16:38:44	0.044
06/07/2005	16:53:44	0.041
06/07/2005	17:08:44	0.039

TrakPro v3.20, Test: Test002, Date: 06/08/2005 05:18:16

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/08/2005	05:33:16	0.056
06/08/2005	05:48:16	0.054
06/08/2005	06:03:16	0.060
06/08/2005	06:18:16	0.064
06/08/2005	06:33:16	0.070
06/08/2005	06:48:16	0.068
06/08/2005	07:03:16	0.069
06/08/2005	07:18:16	0.067
06/08/2005	07:33:16	0.067
06/08/2005	07:48:16	0.065
06/08/2005	08:03:16	0.060
06/08/2005	08:18:16	0.053
06/08/2005	08:33:16	0.050
06/08/2005	08:48:16	0.041
06/08/2005	09:03:16	0.033
06/08/2005	09:18:16	0.029
06/08/2005	09:33:16	0.030
06/08/2005	09:48:16	0.028
06/08/2005	10:03:16	0.099
06/08/2005	10:18:16	0.027
06/08/2005	10:33:16	0.026
06/08/2005	10:48:16	0.024
06/08/2005	11:03:16	0.023
06/08/2005	11:18:16	0.033
06/08/2005	11:33:16	0.023
06/08/2005	11:48:16	0.022
06/08/2005	12:03:16	0.025
06/08/2005	12:18:16	0.028
06/08/2005	12:33:16	0.043
06/08/2005	12:48:16	0.040
06/08/2005	13:03:16	0.042
06/08/2005	13:18:16	0.039
06/08/2005	13:33:16	0.038
06/08/2005	13:48:16	0.037
06/08/2005	14:03:16	0.035
06/08/2005	14:18:16	0.032
06/08/2005	14:33:16	0.031
06/08/2005	14:48:16	0.029
06/08/2005	15:03:16	0.025
06/08/2005	15:18:16	0.020

TrakPro v3.20, Test: Test002, Date: 06/08/2005 05:18:16

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/08/2005	15:33:16	0.022
06/08/2005	15:48:16	0.026
06/08/2005	16:03:16	0.033
06/08/2005	16:18:16	0.030
06/08/2005	16:33:16	0.027
06/08/2005	16:48:16	0.031
06/08/2005	17:03:16	0.043
06/08/2005	17:18:16	0.029
06/08/2005	17:33:16	0.032

TrakPro v3.20, Test: Test003, Date: 06/15/2005 07:37:58

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/15/2005	07:52:58	0.044
06/15/2005	08:07:58	0.027
06/15/2005	08:22:58	0.026
06/15/2005	08:37:58	0.025
06/15/2005	08:52:58	0.022
06/15/2005	09:07:58	0.025
06/15/2005	09:22:58	0.026
06/15/2005	09:37:58	0.026
06/15/2005	09:52:58	0.025
06/15/2005	10:07:58	0.026
06/15/2005	10:22:58	0.030
06/15/2005	10:37:58	0.032
06/15/2005	10:52:58	0.037
06/15/2005	11:07:58	0.036
06/15/2005	11:22:58	0.036
06/15/2005	11:37:58	0.040
06/15/2005	11:52:58	0.047
06/15/2005	12:07:58	0.050
06/15/2005	12:22:58	0.053
06/15/2005	12:37:58	0.049
06/15/2005	12:52:58	0.048
06/15/2005	13:07:58	0.044
06/15/2005	13:22:58	0.042
06/15/2005	13:37:58	0.040
06/15/2005	13:52:58	0.038
06/15/2005	14:07:58	0.035
06/15/2005	14:22:58	0.035
06/15/2005	14:37:58	0.036
06/15/2005	14:52:58	0.033
06/15/2005	15:07:58	0.032
06/15/2005	15:22:58	0.032
06/15/2005	15:37:58	0.033
06/15/2005	15:52:58	0.032
06/15/2005	16:07:58	0.032
06/15/2005	16:22:58	0.032
06/15/2005	16:37:58	0.034
06/15/2005	16:52:58	0.034
06/15/2005	17:07:58	0.035
06/15/2005	17:22:58	0.035
06/15/2005	17:37:58	0.037

TrakPro v3.20, Test: Test003, Date: 06/15/2005 07:37:58

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/15/2005	17:52:58	0.037
06/15/2005	18:07:58	0.036
06/15/2005	18:22:58	0.034

TrakPro v3.20, Test: Test004, Date: 06/16/2005 08:19:40

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/16/2005	08:34:40	0.044
06/16/2005	08:49:40	0.046
06/16/2005	09:04:40	0.045
06/16/2005	09:19:40	0.042
06/16/2005	09:34:40	0.042
06/16/2005	09:49:40	0.043
06/16/2005	10:04:40	0.046
06/16/2005	10:19:40	0.046
06/16/2005	10:34:40	0.045
06/16/2005	10:49:40	0.045
06/16/2005	11:04:40	0.044
06/16/2005	11:19:40	0.042
06/16/2005	11:34:40	0.040
06/16/2005	11:49:40	0.039
06/16/2005	12:04:40	0.040
06/16/2005	12:19:40	0.038
06/16/2005	12:34:40	0.036
06/16/2005	12:49:40	0.035
06/16/2005	13:04:40	0.035
06/16/2005	13:19:40	0.034
06/16/2005	13:34:40	0.033
06/16/2005	13:49:40	0.033
06/16/2005	14:04:40	0.034
06/16/2005	14:19:40	0.035
06/16/2005	14:34:40	0.037
06/16/2005	14:49:40	0.036
06/16/2005	15:04:40	0.036
06/16/2005	15:19:40	0.039
06/16/2005	15:34:40	0.041
06/16/2005	15:49:40	0.041
06/16/2005	16:04:40	0.042
06/16/2005	16:19:40	0.043
06/16/2005	16:34:40	0.043
06/16/2005	16:49:40	0.045
06/16/2005	17:04:40	0.044
06/16/2005	17:19:40	0.043
06/16/2005	17:34:40	0.044
06/16/2005	17:49:40	0.047

TrakPro v3.20, Test: Test005, Date: 06/17/2005 07:19:23

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/17/2005	07:34:23	0.025
06/17/2005	07:49:23	0.028
06/17/2005	08:04:23	0.023
06/17/2005	08:19:23	0.017
06/17/2005	08:34:23	0.017
06/17/2005	08:49:23	0.016
06/17/2005	09:04:23	0.016
06/17/2005	09:19:23	0.017
06/17/2005	09:34:23	0.016
06/17/2005	09:49:23	0.015
06/17/2005	10:04:23	0.015
06/17/2005	10:19:23	0.014
06/17/2005	10:34:23	0.014
06/17/2005	10:49:23	0.015
06/17/2005	11:04:23	0.014
06/17/2005	11:19:23	0.014
06/17/2005	11:34:23	0.014
06/17/2005	11:49:23	0.015
06/17/2005	12:04:23	0.015
06/17/2005	12:19:23	0.015
06/17/2005	12:34:23	0.015

Data Log Output

Downwind Aerosol Monitoring

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TrakPro v3.20, Test: Test001, Date: 06/07/2005 12:38:44

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/07/2005	12:53:44	0.069
06/07/2005	13:08:44	0.065
06/07/2005	13:23:44	0.059
06/07/2005	13:38:44	0.053
06/07/2005	13:53:44	0.051
06/07/2005	14:08:44	0.049
06/07/2005	14:23:44	0.047
06/07/2005	14:38:44	0.047
06/07/2005	14:53:44	0.046
06/07/2005	15:08:44	0.045
06/07/2005	15:23:44	0.043
06/07/2005	15:38:44	0.042
06/07/2005	15:53:44	0.042
06/07/2005	16:08:44	0.043
06/07/2005	16:23:44	0.041
06/07/2005	16:38:44	0.044
06/07/2005	16:53:44	0.041
06/07/2005	17:08:44	0.039

TrakPro v3.20, Test: Test002, Date: 06/08/2005 05:18:16

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/08/2005	05:33:16	0.056
06/08/2005	05:48:16	0.054
06/08/2005	06:03:16	0.060
06/08/2005	06:18:16	0.064
06/08/2005	06:33:16	0.070
06/08/2005	06:48:16	0.068
06/08/2005	07:03:16	0.069
06/08/2005	07:18:16	0.067
06/08/2005	07:33:16	0.067
06/08/2005	07:48:16	0.065
06/08/2005	08:03:16	0.060
06/08/2005	08:18:16	0.053
06/08/2005	08:33:16	0.050
06/08/2005	08:48:16	0.041
06/08/2005	09:03:16	0.033
06/08/2005	09:18:16	0.029
06/08/2005	09:33:16	0.030
06/08/2005	09:48:16	0.028
06/08/2005	10:03:16	0.099
06/08/2005	10:18:16	0.027
06/08/2005	10:33:16	0.026
06/08/2005	10:48:16	0.024
06/08/2005	11:03:16	0.023
06/08/2005	11:18:16	0.033
06/08/2005	11:33:16	0.023
06/08/2005	11:48:16	0.022
06/08/2005	12:03:16	0.025
06/08/2005	12:18:16	0.028
06/08/2005	12:33:16	0.043
06/08/2005	12:48:16	0.040
06/08/2005	13:03:16	0.042
06/08/2005	13:18:16	0.039
06/08/2005	13:33:16	0.038
06/08/2005	13:48:16	0.037
06/08/2005	14:03:16	0.035
06/08/2005	14:18:16	0.032
06/08/2005	14:33:16	0.031
06/08/2005	14:48:16	0.029
06/08/2005	15:03:16	0.025
06/08/2005	15:18:16	0.020

TrakPro v3.20, Test: Test002, Date: 06/08/2005 05:18:16

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/08/2005	15:33:16	0.022
06/08/2005	15:48:16	0.026
06/08/2005	16:03:16	0.033
06/08/2005	16:18:16	0.030
06/08/2005	16:33:16	0.027
06/08/2005	16:48:16	0.031
06/08/2005	17:03:16	0.043
06/08/2005	17:18:16	0.029
06/08/2005	17:33:16	0.032

TrakPro v3.20, Test: Test001, Date: 06/15/2005 07:40:59

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/15/2005	07:55:59	0.064
06/15/2005	08:10:59	0.032
06/15/2005	08:25:59	0.031
06/15/2005	08:40:59	0.035
06/15/2005	08:55:59	0.031
06/15/2005	09:10:59	0.024
06/15/2005	09:25:59	0.025
06/15/2005	09:40:59	0.028
06/15/2005	09:55:59	0.029
06/15/2005	10:10:59	0.053
06/15/2005	10:25:59	0.081
06/15/2005	10:40:59	0.054
06/15/2005	10:55:59	0.087
06/15/2005	11:10:59	0.104
06/15/2005	11:25:59	0.109
06/15/2005	11:40:59	0.083
06/15/2005	11:55:59	0.045
06/15/2005	12:10:59	0.046
06/15/2005	12:25:59	0.052
06/15/2005	12:40:59	0.051
06/15/2005	12:55:59	0.046
06/15/2005	13:10:59	0.042
06/15/2005	13:25:59	0.040
06/15/2005	13:40:59	0.038
06/15/2005	13:55:59	0.039
06/15/2005	14:10:59	0.035
06/15/2005	14:25:59	0.037
06/15/2005	14:40:59	0.033
06/15/2005	14:55:59	0.033
06/15/2005	15:10:59	0.029
06/15/2005	15:25:59	0.030
06/15/2005	15:40:59	0.031
06/15/2005	15:55:59	0.031
06/15/2005	16:10:59	0.029
06/15/2005	16:25:59	0.030
06/15/2005	16:40:59	0.031
06/15/2005	16:55:59	0.033
06/15/2005	17:10:59	0.031
06/15/2005	17:25:59	0.035
06/15/2005	17:40:59	0.036

TrakPro v3.20, Test: Test001, Date: 06/15/2005 07:40:59

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/15/2005	17:55:59	0.034
06/15/2005	18:10:59	0.037
06/15/2005	18:25:59	0.032

TrakPro v3.20, Test: Test002, Date: 06/16/2005 08:06:57

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/16/2005	08:21:57	0.030
06/16/2005	08:36:57	0.038
06/16/2005	08:51:57	0.030
06/16/2005	09:06:57	0.032
06/16/2005	09:21:57	0.030
06/16/2005	09:36:57	0.028
06/16/2005	09:51:57	0.029
06/16/2005	10:06:57	0.032
06/16/2005	10:21:57	0.032
06/16/2005	10:36:57	0.034
06/16/2005	10:51:57	0.034
06/16/2005	11:06:57	0.033
06/16/2005	11:21:57	0.031
06/16/2005	11:36:57	0.029
06/16/2005	11:51:57	0.029
06/16/2005	12:06:57	0.029
06/16/2005	12:21:57	0.029
06/16/2005	12:36:57	0.028
06/16/2005	12:51:57	0.027
06/16/2005	13:06:57	0.026
06/16/2005	13:21:57	0.026
06/16/2005	13:36:57	0.027
06/16/2005	13:51:57	0.025
06/16/2005	14:06:57	0.027
06/16/2005	14:21:57	0.027
06/16/2005	14:36:57	0.028
06/16/2005	14:51:57	0.029
06/16/2005	15:06:57	0.028
06/16/2005	15:21:57	0.030
06/16/2005	15:36:57	0.032
06/16/2005	15:51:57	0.033
06/16/2005	16:06:57	0.032
06/16/2005	16:21:57	0.033
06/16/2005	16:36:57	0.035
06/16/2005	16:51:57	0.035
06/16/2005	17:06:57	0.036
06/16/2005	17:21:57	0.037
06/16/2005	17:36:57	0.041
06/16/2005	17:51:57	0.036

TrakPro v3.20, Test: Test002, Date: 06/16/2005 08:06:57

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/16/2005	08:21:57	0.030
06/16/2005	08:36:57	0.038
06/16/2005	08:51:57	0.030
06/16/2005	09:06:57	0.032
06/16/2005	09:21:57	0.030
06/16/2005	09:36:57	0.028
06/16/2005	09:51:57	0.029
06/16/2005	10:06:57	0.032
06/16/2005	10:21:57	0.032
06/16/2005	10:36:57	0.034
06/16/2005	10:51:57	0.034
06/16/2005	11:06:57	0.033
06/16/2005	11:21:57	0.031
06/16/2005	11:36:57	0.029
06/16/2005	11:51:57	0.029
06/16/2005	12:06:57	0.029
06/16/2005	12:21:57	0.029
06/16/2005	12:36:57	0.028
06/16/2005	12:51:57	0.027
06/16/2005	13:06:57	0.026
06/16/2005	13:21:57	0.026
06/16/2005	13:36:57	0.027
06/16/2005	13:51:57	0.025
06/16/2005	14:06:57	0.027
06/16/2005	14:21:57	0.027
06/16/2005	14:36:57	0.028
06/16/2005	14:51:57	0.029
06/16/2005	15:06:57	0.028
06/16/2005	15:21:57	0.030
06/16/2005	15:36:57	0.032
06/16/2005	15:51:57	0.033
06/16/2005	16:06:57	0.032
06/16/2005	16:21:57	0.033
06/16/2005	16:36:57	0.035
06/16/2005	16:51:57	0.035
06/16/2005	17:06:57	0.036
06/16/2005	17:21:57	0.037
06/16/2005	17:36:57	0.041
06/16/2005	17:51:57	0.036

TrakPro v3.20, Test: Test003, Date: 06/17/2005 07:16:59

Date mm/dd/yyyy	Time hh:mm:ss	Aerosol mg/m^3
06/17/2005	07:31:59	0.020
06/17/2005	07:46:59	0.020
06/17/2005	08:01:59	0.022
06/17/2005	08:16:59	0.016
06/17/2005	08:31:59	0.016
06/17/2005	08:46:59	0.014
06/17/2005	09:01:59	0.014
06/17/2005	09:16:59	0.014
06/17/2005	09:31:59	0.014
06/17/2005	09:46:59	0.014
06/17/2005	10:01:59	0.013
06/17/2005	10:16:59	0.013
06/17/2005	10:31:59	0.013
06/17/2005	10:46:59	0.012
06/17/2005	11:01:59	0.015
06/17/2005	11:16:59	0.014
06/17/2005	11:31:59	0.014
06/17/2005	11:46:59	0.018
06/17/2005	12:01:59	0.014
06/17/2005	12:16:59	0.016
06/17/2005	12:31:59	0.015