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Transmitted Via E-Mail & U.S. Mail

January 5, 2006

Ms. Alicia Barraza
New York State Department of Environmental Conservation
Division of Solid and 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
USEPA ID#: NYD002920312
AOC 45 ICM Soil Removal Work Plan
BBL Project #: 2303.32303 #5

Dear Ms. Barraza:

On behalf of Bayer MaterialScience LLC (Bayer), this letter presents a work plan for additional interim corrective measure (ICM) soil removal activities to be performed at the Bayer facility located in Hicksville, New York (the "site"). The site location is shown on Figure 1, and the site layout is shown on Figure 2. The ICM activities described herein will be performed to remove soils extending beneath and around the former Pilot Plant sumps (Area of Concern [AOC] 45) that exhibit polychlorinated biphenyls (PCBs) at concentrations above 50 parts per million (ppm). These activities will be performed in response to the findings of the pre-excavation delineation/verification soil sampling completed as part of the previous ICM, as detailed in the *Interim Corrective Measure Certification Report* prepared by Blasland, Bouck & Lee, Inc. (BBL, November 2005) [the "ICM Certification Report"].

Relevant background information is presented below, followed by a discussion of the proposed ICM activities and anticipated schedule for implementing the activities.

BACKGROUND

A detailed discussion of site conditions is presented in the New York State Department of Environmental Conservation- (NYSDEC-) approved *RCRA Facility Investigation Report* (BBL, June 2004) [the "RFI Report"]. Details of the previous ICM pre-excavation delineation/verification soil sampling performed to determine the horizontal and vertical extent of PCB-impacted soils in AOC 45 are presented in the ICM Certification Report. A brief summary of the ICM pre-excavation delineation/verification soil sampling activities and results is presented below.

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Soil borings were completed at 23 sampling locations in AOC 45 (locations VS-45-1 through VS-45-23, as shown on Figure 3) as part of the previous ICM. With one exception, the borings were advanced to depths ranging from approximately 8 feet to 20 feet below the surrounding grade (the boring at location VS-45-2 was advanced to a depth of approximately 58 feet below the surrounding grade, which is equivalent to approximately 60 feet below the bottom of the Pilot Plant concrete floor slab). Soil samples collected from selected intervals within each soil boring were submitted to Severn Trent Laboratories, Inc. (STL) of Shelton, Connecticut and either analyzed for PCBs or archived for potential future analysis, if needed, based on the results for adjacent or overlying/underlying samples. A total of 77 soil samples from 18 of the 23 soil borings (plus 8 duplicate samples) were ultimately analyzed for PCBs.

Data validation was performed for each sample delivery group (SDG) where one or more PCB soil analytical result(s) were less than the 50 ppm ICM soil cleanup objective. The PCB laboratory analytical results for the pre-excavation delineation/verification samples are presented in Table 1 and shown on Figure 3. Based on the analytical results, PCBs were identified at concentrations above 50 ppm at five soil boring locations (locations VS-45-1, VS-45-2, VS-45-7, VS-45-11, and VS-45-20, as shown on Figure 3). The approximate horizontal limits of the soils found to contain PCBs at concentrations above 50 ppm are shown on Figure 3. The approximate vertical limits of the impacted soils are shown on the two cross-sections included on Figure 4. Soils exhibiting PCBs at concentrations above 50 ppm extend over an approximately 320 square foot area in the southwest corner of the Pilot Plant. The depth of the PCB-impacted soils ranges from approximately 8 feet to 29 feet below the bottom of the concrete floor slab (equivalent to approximately 6 to 27 feet below the surrounding grade).

PROPOSED APPROACH

Based on the delineation provided by the previous ICM soil sampling activities, soils in AOC 45 that exhibit PCBs at concentrations above 50 ppm will be removed as part of this next ICM. The proposed ICM activities described herein will be performed in connection with ongoing foundation demolition activities. Changes to the ICM activities may be necessary based on unforeseen field conditions that may be encountered. Any needed changes to the ICM activities will be discussed with the NYSDEC prior to implementation.

The proposed soil excavation limits are shown on Figures 5 and 6. As shown on the figures, soils will be removed from an approximately 500 square feet area around the two sumps in AOC 45 (both the interior and exterior sump) to depths ranging from approximately 10 feet to 30 feet below the bottom of the existing Pilot Plant floor slab (equivalent to 8 to 28 feet below the surrounding grade). The proposed excavation limits are intended to be conservative considering the existing ICM pre-excavation delineation/verification soil sampling results (i.e., more soils are included within the proposed excavation limits shown on Figure 5 than within the delineation shown on Figure 3). The limits are also feasible considering the anticipated excavation equipment and excavation support systems needed to reach the vertical extent of PCB-impacted soils (i.e., it would not be practical to remove soils from the seven-sided polygon shown on Figure 3, especially considering the significant depth of the proposed excavation and the need for an excavation support system, as discussed further below). Based on the extensive pre-excavation delineation/verification soil sampling data already available, post-excavation verification soil sampling will not be performed as part of this ICM.

Groundwater is encountered at a depth of 50 feet or more in the vicinity of the site, and therefore, is not anticipated to be encountered during the proposed ICM excavation activities.

Proposed pre-construction activities to be performed in preparation for the ICM soil removal activities are discussed below, followed by a discussion of the proposed approach for the soil removal and related activities, including waste handling/offsite disposal, air monitoring, equipment decontamination, and site restoration.

Pre-Construction Activities

The horizontal limits of the proposed excavation will be determined in the field based on: (1) tie-distances measured from the existing ICM pre-excavation delineation/verification soil sampling locations; and/or (2) coordinates located using a hand-held global positioning system (GPS) device (coordinates would be derived electronically from Figure 5 and input into the GPS device). Surveying activities will only be performed, if needed, to mark out the proposed excavation limits. The mark-out will be performed prior to removal of the concrete floor slab in the Pilot Plant area. The excavation limits will be marked using spray paint or flagged metal pins, as appropriate. The paint markings and/or metal pins will be replaced by flagged wooden stakes, as appropriate, as demolition of the concrete floor slab proceeds in accordance with the NYSDEC-approved *Demolition Work Plan* (BBL, July 2005) and follow-up correspondence. Additional flagged wooden stakes will be installed at offset locations, as appropriate, for additional reference to facilitate identification of the excavation limits.

The approximate locations of nearby subsurface utilities will also be marked as part of the pre-construction activities. Based on our review of a historic facility construction drawing prepared for the Rubber Corporation of America titled, "Plant Utilities Outdoor Piping," Drawing No. 3-62-0-109, dated March 19, 1962 (previously provided to the NYSDEC) and observations during the previous ICM activities, various subsurface utilities are located in the immediate vicinity of the proposed excavation area, as discussed below.

- An approximately 8-inch diameter metal storm sewer pipe extends in an east-west direction south of the former Pilot Plant. The pipe discharges flow from a catch basin south of the Pilot Plant (identified as AOC 11) toward the former rainwater runoff sump in AOC 30.

- A 6-inch diameter fire-protection water line runs parallel to the storm sewer pipe (the fire-protection water line is anticipated to be encountered immediately north of the storm sewer pipe). A service connection from the water line enters the interior sump in AOC 45.

- A concrete-encased utility trench extends from the Plant 1 boiler area to the lower (exterior) sump in AOC 45. The trench contains several abandoned utility lines, including two 1-inch diameter lines (a former air line and gas line), four 2-inch diameter lines (former water supply and water return lines and former oil feed and oil return lines), a 4-inch diameter condensate return line, and a former 220-volt and a former 440-volt electric line.

After the excavation and utility mark-outs are complete, a small berm will be created around the proposed excavation area to divert surface water runoff (if any) away from the area during subsequent excavation. The berm will be created by temporarily re-grading soils outside the proposed excavation limits.

Material staging areas will also be constructed, as needed, for temporary staging of excavated impacted soils prior to offsite transportation and disposal. Each material staging area will be bermed and lined with a low-permeability liner that will slope to a lined collection sump.

The erosion and sedimentation control measures installed for the ongoing demolition work will be used for the proposed ICM soil removal activities. These measures were installed and will continue to be maintained in accordance with provisions in the *Stormwater Pollution Prevention Plan* (BBL, October 2005).

PCB-Impacted Soil Removal

Soil removal activities in AOC 45 will begin following the demolition and removal of the concrete floor slab and removal of two-feet of underlying concrete foundation materials in accordance with the *Demolition Work Plan.* Concrete generated by these demolition activities will be managed based on the results of pre-demolition concrete characterization sampling activities, as summarized in a letter from BBL to the NYSDEC dated December 23, 2005. It is anticipated that the remaining concrete walls and flooring of the existing sumps in AOC 45 (both the interior and exterior sumps) will be fully removed in connection with the ICM soil removal activities described herein. The resulting concrete debris will be managed with the soils containing PCBs at concentrations above 50 ppm (as discussed below).

The existing concrete sumps in AOC 45 will be demolished using an excavator equipped with a ram-hoe attachment. After the sumps are demolished, the resulting concrete debris and surrounding PCB-impacted soils will be removed via the excavator equipped with a digging bucket. The anticipated volume of soils exhibiting PCBs at concentrations above 50 ppm and concrete debris to be removed from the excavation is approximately 375 cubic yards (CY) (or approximately 600 tons). The final volume of impacted soils/materials to be managed will be greater than this amount depending on the excavation support system selected.

The excavation sidewalls will be supported in accordance with Occupational Safety and Health Administration (OSHA) requirements for excavations as outlined in 29 CFR Part 1926 Subpart P. The support system design will be prepared by the Contractor in accordance with applicable OSHA regulations. It is currently anticipated that the support system will involve either:

- sloping and/or benching the excavation sidewalls. Based on the anticipated maximum depth of the excavation (30 feet) and type of soils in the area (sand/gravel), a significant amount of additional soil excavation and management would be required outside the proposed excavation limits to provide the needed minimum sloping or benching. Assuming sidewall slopes of 1½ to 1 (horizontal to vertical), the overall excavation dimensions would be approximately 105 feet wide by 115 feet long (vs. 20 feet wide by 23 feet long assuming vertical excavation). Sloping/benching would result in the excavation of an estimated additional 6,500 CY of soils. In addition, some of the soils removed for sloping purposes exhibit PCBs at concentrations above 10 ppm (such as the soils in the vicinity of existing sampling location VS-45-4), and once excavated, these soils would require offsite disposal as a non-hazardous waste. It is anticipated that the remaining soils, which exhibit PCB concentrations less than 10 ppm, would be used as subsurface fill material (greater than 1 foot below the ground surface) within the excavation area, following completion of the excavation activities; or

- installing temporary bracing and/or a steel sheetpile wall to support the excavation sidewalls. Additional excavation would be needed in various areas to remove underground utilities to facilitate the bracing/sheetpile wall installation. The design of the bracing/sheetpile wall would be made based on the results of standard penetration tests performed in connection with soil boring and sampling activities completed in August 2005 and the results of particle size distribution testing and other geotechnical testing to be performed on samples collected and archived during the August 2005 sampling event.

Selection of an excavation support system will be made based on an evaluation of potential costs for the two potential approaches. Regardless of the excavation support system selected, daily inspections of the "open" excavation will be performed by trained personnel to evaluate situations that could result in possible cave-ins or failure of the protective system(s). Based on inspection results, corrective actions will be implemented, as needed.

Waste Handling/Offsite Disposal

The soils and concrete debris to be removed from within the proposed excavation limits will be: (1) transferred to one or more lined material staging areas for temporary staging prior to offsite transportation and disposal; and/or (2) direct-loaded into rolloff waste containers or dump trailers for offsite transportation and disposal. Similarly, soils exhibiting PCBs at concentrations between 10 and 50 ppm that are removed for purposes of sloping/benching or to facilitate bracing/sheetpile wall installation will be transferred to a material staging area (separate from the area for staging of soils exhibiting PCBs at concentrations above 50 ppm) or direct-loaded into rolloff waste containers/dump trailers. Soils placed within the material staging areas will be covered using low-permeability material (to minimize potential siltation/migration of soil beyond the staging areas). The low-permeability liner and cover will be secured to resist potential wind forces.

Excavated soils will be transported for offsite disposal or re-used onsite as subsurface fill material, as detailed below.

- Soils and subsurface concrete debris removed from the proposed excavation limits will be transported for offsite disposal as a Toxic Substances Control Act (TSCA-) regulated PCB waste and New York State hazardous waste (Waste Code B007). This will include the uppermost soils in the vicinity of sampling locations VS-45-2, VS-45-7, and VS-45-20 where PCB concentrations are less than 50 ppm (as a conservative measure).

- Soils and subsurface concrete debris removed from northwest of the proposed excavation limits (in the vicinity of previous ICM delineation/verification soil sampling location VS-45-4, where PCBs were identified at concentrations between 10 ppm and 50 ppm), if any, will be transported for offsite disposal as a non-hazardous waste. Based on requirements of the disposal facility(ies), some of the excavated soils exhibiting PCBs at concentrations approaching 50 ppm (such as the 4.5 to 5.0 foot depth interval at sampling location VS-45-4) may be transported for offsite disposal as a TSCA-regulated PCB waste and New York State hazardous waste.

- As indicated above, excavated soils exhibiting PCBs at concentrations less than 10 ppm would be used as subsurface fill material (greater than 1 foot below the ground surface) within the excavation area, following completion of the excavation activities. Alternatively, Bayer may elect to transport some, or all, of these soils for offsite disposal. Based on the existing analytical data/sampling locations, it would not be practical to segregate soils with PCBs at concentrations less than 1 ppm (which would be unrestricted for reuse) from those containing PCBs at concentrations between 1 and 10 ppm.

Air Monitoring

Airborne monitoring for particulates (dust) will be performed during the activities that have the potential for generation of dust (excavation, soil handling, etc.). The monitoring will be performed as described in Subsection 2.9 of the *Demolition Work Plan.* Based on the results of the extensive soil sampling, field screening, and laboratory analysis performed as part of the previous ICM activities in this area, monitoring for total organic vapors (TOV) is not proposed. However, a photoionization detector (PID) will be available for TOV screening should unforeseen conditions arise (obvious odors, heavily stained soils, etc.).

Equipment Decontamination

The excavator used for the ICM soil removal activities may, at times, alternate between removing clean soils (for sloping purposes) and impacted soils. After removing or handling impacted soils, field personnel will visually check the excavator bucket for the presence of adhered soils before removing clean soils. If adhered soils are observed, the soils will be removed using a shovel/broom and managed with the excavated impacted soils.

Project equipment that comes in contact with impacted site media will be decontaminated prior to being demobilized from the Site and prior to being used for re-grading clean soils around the excavation area. The decontamination activities will be conducted within the lined equipment decontamination area or over a lined rolloff waste container. Decontamination activities will be performed until no visible soil or debris are present on the equipment surfaces (as determined by BBL's onsite representative).

Washwaters generated by the equipment decontamination activities will be containerized for offsite treatment/disposal based on characterization sampling results. Solid wastes generated by the equipment decontamination activities will be containerized for offsite disposal with the excavated PCB-impacted soils.

Site Restoration

Site restoration activities will be initiated after the proposed limits of excavation have been reached. The site restoration activities will consist of the following:

- placing excavated soils that do not exhibit PCBs at concentrations above 10 ppm as subsurface backfill material;

- placing non-impacted (exempt) crushed brick and mortar wall materials from previous demolition activities and concrete materials generated by the ongoing foundation demolition activities in the excavated areas. As an alternative (or in addition), excess clean fill material obtained from construction activities underway at a nearby offsite location may be placed in the excavation area. Laboratory analytical results for a composite sample collected (by Glenn Springs Holdings) to characterize the material are provided in Attachment 1. Based on review of the analytical results, the soils do not exhibit PCBs, volatile organic compounds (VOCs), or semi-volatile organic compounds (SVOCs) at concentrations above laboratory detection limits. Concentrations of inorganic constituents identified in the soil sample appear to be generally consistent with the 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), taking into consideration typical New York State regional background values;

- grading the clean soil remaining around the excavated area to remove deep depressions and generally meet the surrounding lines and grades; and

- removing erosion and sedimentation control measures after the ICM activities and ongoing demolition activities are completed.

ICM CERTIFICATION REPORT

Following completion of the ICM activities, an ICM Certification Report will be prepared (letter format). It is anticipated that the certification report will include:

- relevant background information;

- a detailed description of work performed to complete the ICM activities, including a summary of any changes in the scope of the ICM activities based on field conditions encountered;

- figures showing the final excavation limits; and

- copies of daily field reports, air monitoring logs, and manifests/certificates of disposal for wastes generated by the ICM activities.

SCHEDULE

Bayer is prepared to implement the proposed ICM soil excavation activities expeditiously following NYSDEC approval. It is Bayer's intention to complete the ICM activities while needed equipment is already onsite for the ongoing foundation demolition activities. Installation of an excavation support system and actual soil excavation activities are anticipated to take approximately three to four weeks to complete. Site restoration activities are anticipated to take approximately one to two weeks to complete following the offsite transportation and disposal of impacted materials. A detailed schedule of the ICM activities is included in Table 2.

We await the NYSDEC's comments on this ICM Work Plan and look forward to continuing to make progress toward site closure and property transfer. Please do not hesitate to contact Mr. Joel E. Robinson of Bayer at (412) 777-4871 or myself at (315) 671-9441 if you have any questions or require additional information regarding the proposed ICM activities.

Sincerely,

BLASLAND, BOUCK & LEE, INC.

John C. Brussel

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

JCB/jlc
Attachments

cc: Ms. Katy Murphy, New York State Department of Environmental Conservation – Region 1 (1 copy via FedEx)
Mr. Paul Olivo, United States Environmental Protection Agency – Region II (1 copy via FedEx)
Mr. Joel E. Robinson, Bayer MaterialScience LLC (5 copies via U.S. Mail)
Mr. Joseph Molina, III, P.E., Blasland, Bouck & Lee, Inc. (1 copy via U.S. Mail)

Tables

BBL
ENVIRONMENTAL SERVICES, INC.
Remedial Management & Construction

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

AOC 45 ICM SOIL REMOVAL WORK PLAN
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
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
VS-45-14 (0.0-0.5')*	(2.3-1.8' Above)	<0.019	<0.036	<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

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

AOC 45 ICM SOIL REMOVAL WORK PLAN
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
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

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
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 2
PRELIMINARY PROJECT SCHEDULE

AOC 45 ICM SOIL REMOVAL WORK PLAN
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Activity	2006																						
	January				February				March					April				May					
Week:	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	1	2	3	4	5	
ICM Work Plan																							
Submit ICM Work Plan to NYSDEC	▲																						
NYSDEC Review of ICM Work Plan	■	■	■																				
Respond to NYSDEC Comments				■																			
NYSDEC Review of Response/Plan Approval				▲																			
ICM Implementation																							
Excavation Support System Design				■	■																		
Pre-Construction Field Mark-Outs						■																	
Install Excavation Support System & Perform Soil Removal Activities							■	■	■														
Offsite Transportation & Disposal of PCB-Impacted Soils and Debris								■	■	■													
Backfilling/Site Restoration										■	■												
ICM Certification Report																							
Prepare ICM Certification Report											■	■	■	■									
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 of ICM Work Plan and Summary Report.
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.

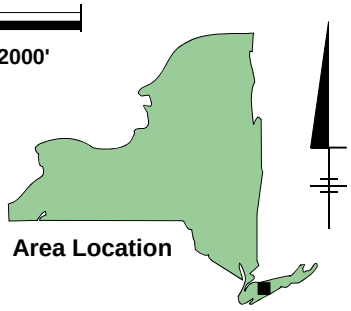
Figures

BBL
ENVIRONMENTAL SERVICES, INC.
Remedial Management & Construction

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

2000' 0 2000'

Approximate Scale: 1" = 2000'



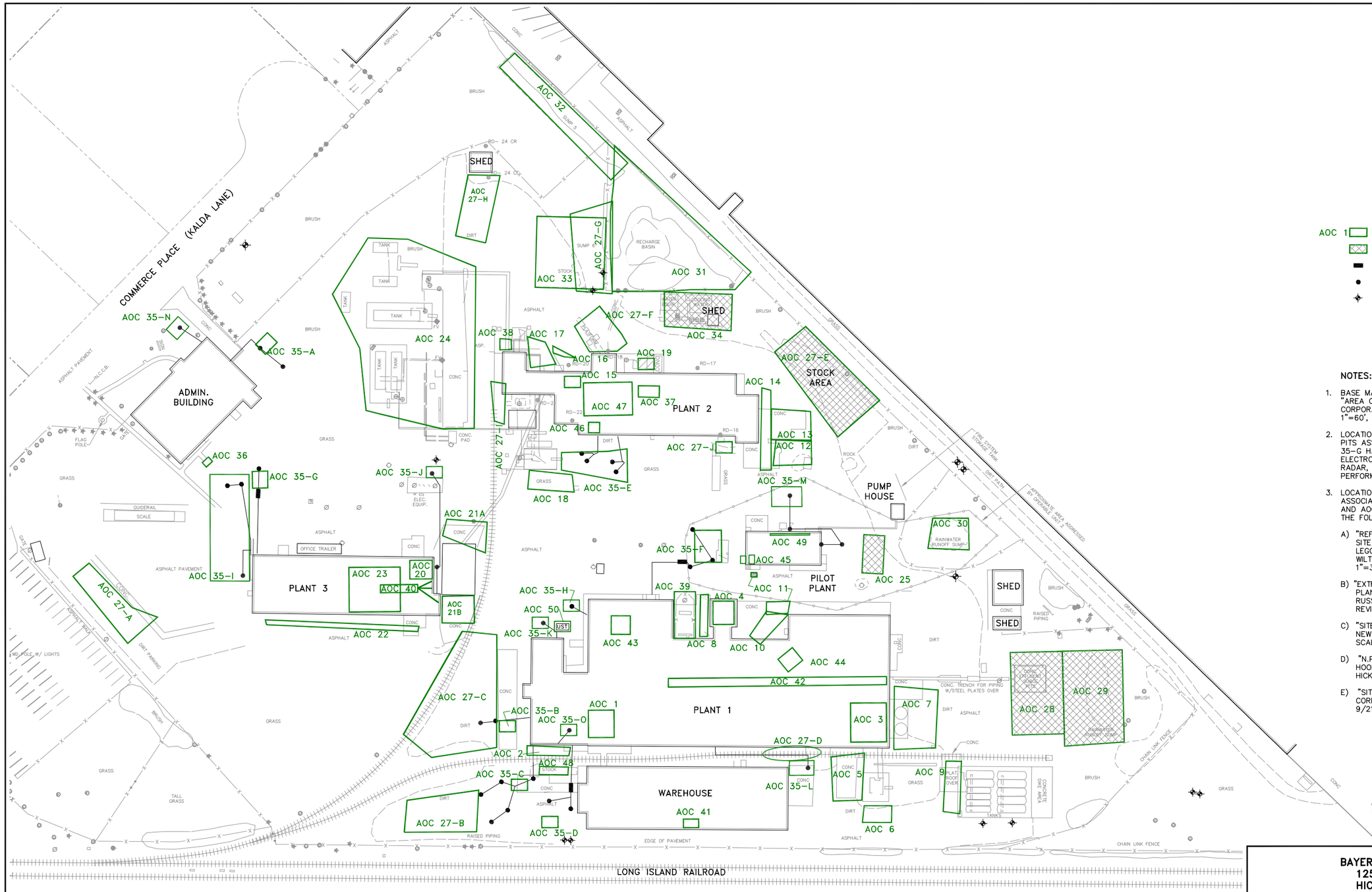
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SITE LOCATION MAP

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

FIGURE 1

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



LEGEND:

- 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.

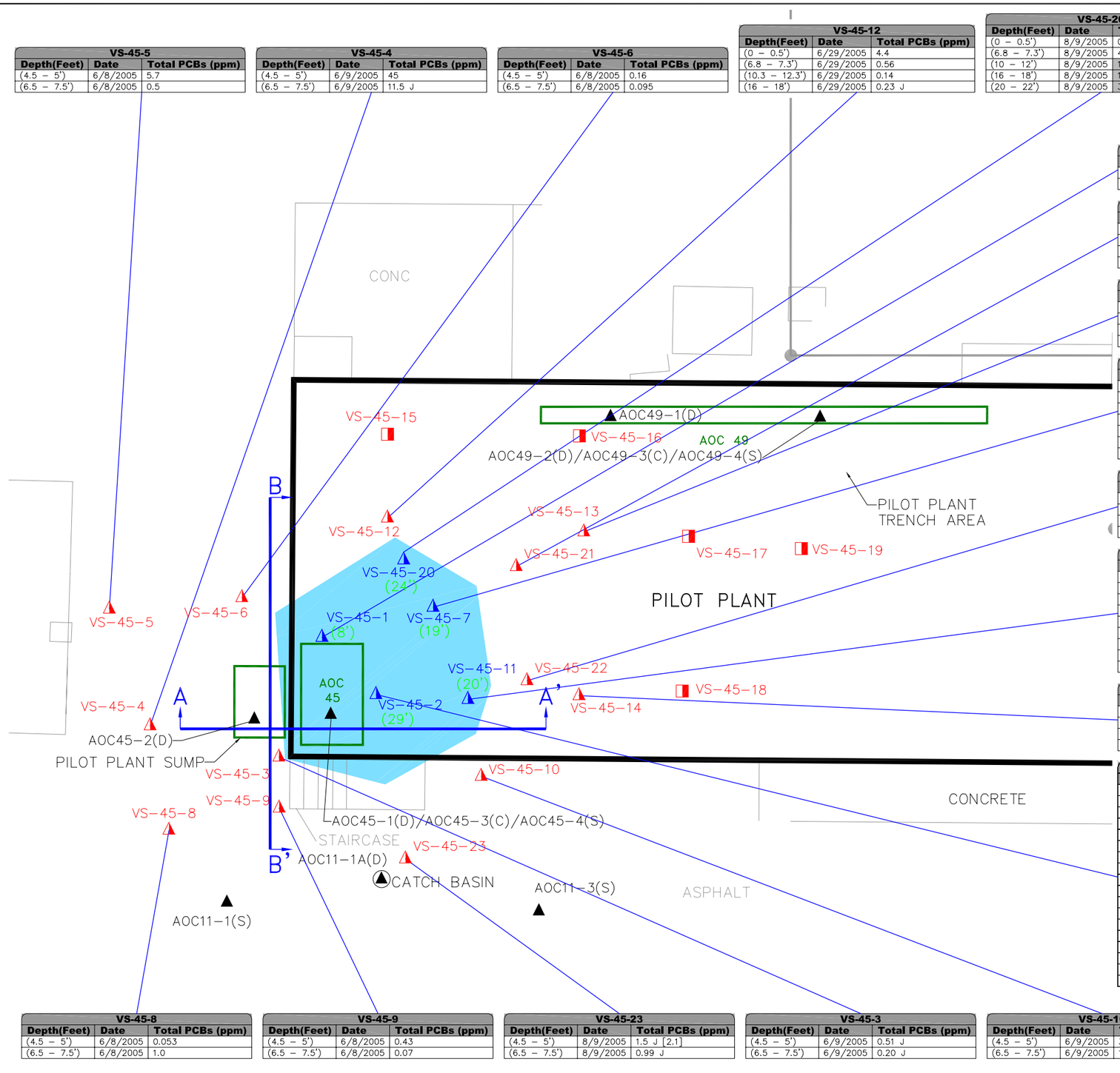
X: 32303X01.DWG
L: ON=*, OFF=REF
P: PAGESET/SYR–DL
12/1/05 SYR–85–GMS WLJ GMS
32303011/32303B01.DWG

BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SITE LAYOUT PLAN

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

FIGURE 2



VS-45-5		
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-45-12		
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-45-1		
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-45-21		
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	7,200
(22 – 24')	6/29/2005	4.1

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-45-11		
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-45-14		
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-45-2		
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	91
(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-45-8		
Depth(Feet)	Date	Total PCBs (ppm)
(4.5 – 5')	6/8/2005	0.053
(6.5 – 7.5')	6/8/2005	1.0

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-45-3		
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

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 4 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

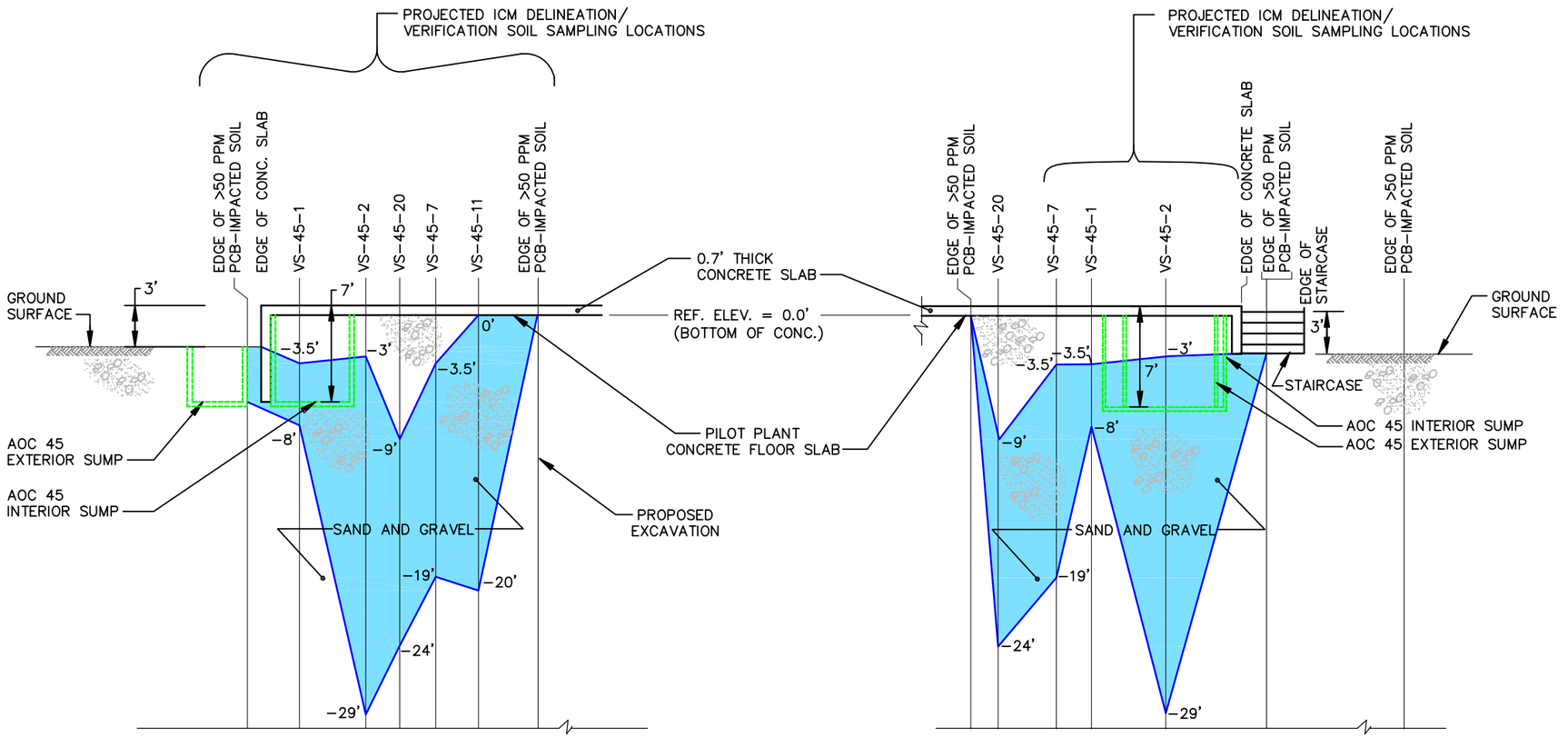
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PCB SOIL ANALYTICAL RESULTS (PPM)

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

FIGURE 3

L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/1/05 SYR-85-RCB WLJ GMS
32303011/32306C01.DWG



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

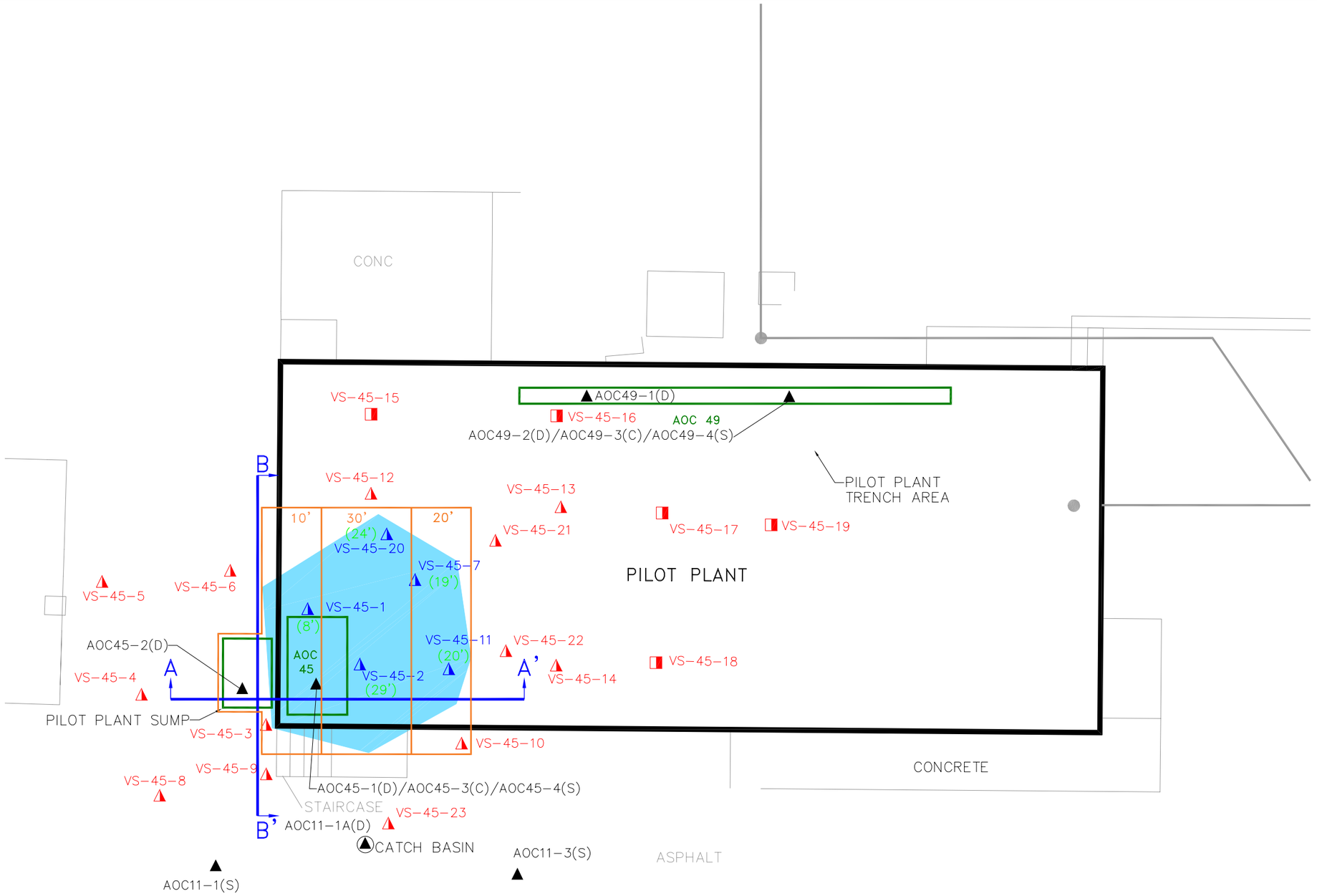
BAYER MATERIAL SCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

SECTIONS A-A' & B-B' (VERTICAL EXTENT OF PCB IMPACTED SOIL)

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

FIGURE 4

L: ON=*, OFF=REF
P: PAGESET/SYR-BL1
12/1/05 SYR-85-TJR GMS WLJ
32303011/32303V02.DWG



LEGEND:

- PROPOSED EXCAVATION LIMITS
- 20' — PROPOSED EXCAVATION DEPTH
- 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 4 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.

0 10' 20'

GRAPHIC SCALE

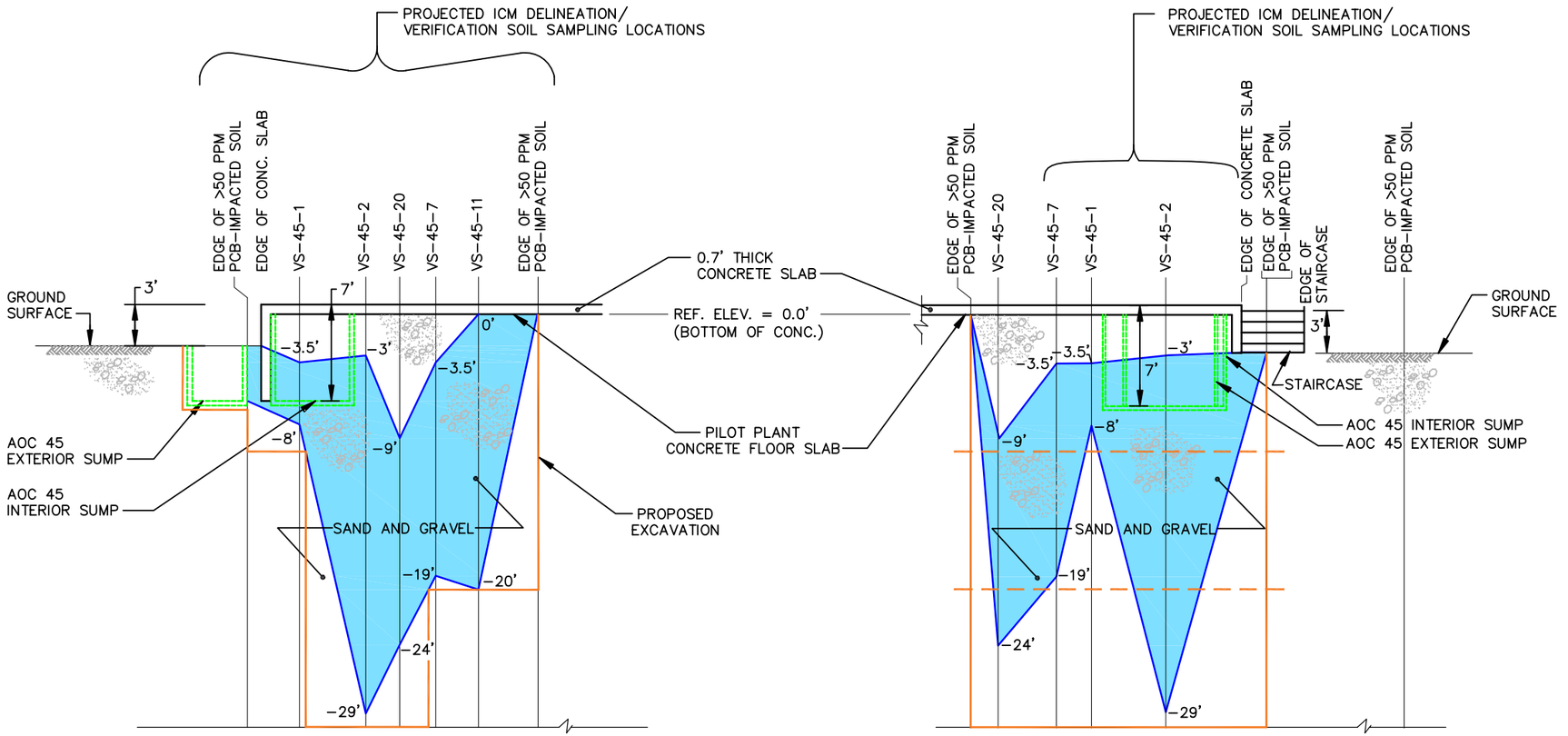
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

PROPOSED SOIL REMOVAL AND VERIFICATION SOIL SAMPLING LOCATION

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

FIGURE 5

L: ON=*, OFF=REF
P: PAGESET/SYR-DL
12/21/05 SYR-85-RCB GMS WLJ
32303011/32306B02.DWG



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:

- PROPOSED EXCAVATION
- 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 PROPOSED PCB IMPACTED SOIL REMOVAL)

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

FIGURE 6

L: ON=*, OFF=REF
P: PAGESET/SYR-BL1
12/20/05 SYR-85-TJR WLJ RCB
32303011/32303V01.DWG

Attachment 1

Imported Fill Material Sampling Results

BBL
ENVIRONMENTAL SERVICES, INC.
Remedial Management & Construction

H2M LABS, INC.

575 Broad Hollow Rd, Melville, NY 11747-5076
Tel: (516) 694-3040 Fax: (516) 420-8436

13505 GSHHST

EXTERNAL CHAIN OF CUSTODY

CLIENT: Conestoga-Rovers & Associates **H2M SDG NO:** HST001

PROJECT NAME/NUMBER: Hooker/Ruco 6883

SAMPLERS: (signature)/Client: S. Daly / Conestoga-Rovers & Assoc

DELIVERABLES:

TURNAROUND TIME: 1 week

NOTES:

Project Contact:

Phone Number:

DATE	TIME	MATRIX	FIELD I.D.	Total No. of Containers	ANALYSIS REQUESTED: ORGANIC VOA	ORGANIC BNA	ORGANIC Pest/PCB	TCL VOCs	TCL SVOCs	PCBs	TAL Metals	INORG. Metal	INORG. CN	LAB I.D. NO.	REMARKS:
10/20/05	11:50	soil	S-006803-102005-SD-001					X	X	X	X			0510597-001 ABC	

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
S. Daly	10/20/05	13:00		10/20/05	13:00
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time

LABORATORY USE ONLY

Discrepancies Between Sample Labels and COC Record? Y or N
Explain:

Samples were:
1. Shipped___ or Hand Delivered___ Airbill# _____
2. Ambient or chilled
3. Received in good condition: Y or N
4. Properly preserved: Y or N
5. Samples returned to lab ___ Hrs from collection.

COC Tape was:
1. Present on outer package: Y or N
2. Unbroken on outer package: Y or N
3. COC record present & complete upon sample receipt: Y or N

HST001 A3

WHITE COPY - ORIGINAL YELLOW COPY - CLIENT PINK COPY - LABORATORY

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

SD-001

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: GSHHST SAS No.: _____ SDG No.: HST001

Matrix: (soil/water) SOIL Lab Sample ID: 0510597-001A

Sample wt/vol: 5 (g/mL) G Lab File ID: 5\P30219.D

Level: (low/med) LOW Date Received: 10/20/05

% Moisture: not dec. 14.3 Date Analyzed: 10/26/05

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 1.00

Soil Extract Volume: _____ (µL) Soil Aliquot Volume _____ (µL)

CAS NO.	COMPOUND	CONCENTRATION UNITS: (µg/L or µg/Kg) UG/KG	Q
75-71-8	Dichlorodifluoromethane	12	U
74-87-3	Chloromethane	12	U
75-01-4	Vinyl chloride	12	U
74-83-9	Bromomethane	12	U
75-00-3	Chloroethane	12	U
75-69-4	Trichlorofluoromethane	12	U
75-35-4	1,1-Dichloroethene	12	U
76-13-1	1,1,2-Trichloro-1,2,2-trifluoroethane	12	U
67-64-1	Acetone	12	U
75-15-0	Carbon disulfide	12	U
79-20-9	Methyl Acetate	12	U
75-09-2	Methylene chloride	10	BJ
156-60-5	trans-1,2-Dichloroethene	12	U
1634-04-4	Methyl tert-butyl ether	12	U
75-34-3	1,1-Dichloroethane	12	U
156-59-2	cis-1,2-Dichloroethene	12	U
78-93-3	2-Butanone	12	U
67-66-3	Chloroform	12	U
71-55-6	1,1,1-Trichloroethane	12	U
110-82-7	Cyclohexane	12	U
56-23-5	Carbon tetrachloride	12	U
71-43-2	Benzene	12	U
107-06-2	1,2-Dichloroethane	12	U
79-01-6	Trichloroethene	12	U
108-87-2	Methylcyclohexane	12	U
78-87-5	1,2-Dichloropropane	12	U
75-27-4	Bromodichloromethane	12	U
10061-01-5	cis-1,3-Dichloropropene	12	U
108-10-1	4-Methyl-2-pentanone	12	U
108-88-3	Toluene	12	U
10061-02-6	trans-1,3-Dichloropropene	12	U
79-00-5	1,1,2-Trichloroethane	12	U
127-18-4	Tetrachloroethene	12	U
591-78-6	2-Hexanone	12	U
124-48-1	Dibromochloromethane	12	U

1B

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

SD-001

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: GSHHST SAS No.: _____ SDG No.: HST001

Matrix: (soil/water) SOIL Lab Sample ID: 0510597-001A

Sample wt/vol: 5 (g/mL) G Lab File ID: 5\P30219.D

Level: (low/med) LOW Date Received: 10/20/05

% Moisture: not dec. 14.3 Date Analyzed: 10/26/05

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 1.00

Soil Extract Volume: _____ (µL) Soil Aliquot Volume _____ (µL)

CAS NO.	COMPOUND	CONCENTRATION UNITS: (µg/L or µg/Kg) UG/KG	Q
106-93-4	1,2-Dibromoethane	12	U
108-90-7	Chlorobenzene	12	U
100-41-4	Ethylbenzene	12	U
1330-20-7	Xylene (total)	12	U
100-42-5	Styrene	12	U
75-25-2	Bromoform	12	U
98-82-8	Isopropylbenzene	12	U
79-34-5	1,1,2,2-Tetrachloroethane	12	U
541-73-1	1,3-Dichlorobenzene	12	U
106-46-7	1,4-Dichlorobenzene	12	U
95-50-1	1,2-Dichlorobenzene	12	U
96-12-8	1,2-Dibromo-3-chloropropane	12	U
120-82-1	1,2,4-Trichlorobenzene	12	U

1C

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

SD-001

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: GSHHST SAS No.: _____ SDG No.: HST001

Matrix: (soil/water) SOIL Lab Sample ID: 0510597-001B

Sample wt/vol: 15 (g/mL) G Lab File ID: A\C30908.D

Level: (low/med) LOW Date Received: 10/20/05

% Moisture: 14.3 Decanted: (Y/N) N Date Extracted: 10/24/05

Concentrated Extract Volume: 1000 (µL) Date Analyzed: 10/25/05

Injection Volume: 2 (µL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: 6.0 Extraction: (Type) PFEX

CAS NO.	COMPOUND	CONCENTRATION UNITS: (µg/L or µg/Kg) UG/KG	Q
100-52-7	Benzaldehyde	390	U
108-95-2	Phenol	390	U
111-44-4	Bis(2-chloroethyl)ether	390	U
95-57-8	2-Chlorophenol	390	U
95-48-7	2-Methylphenol	390	U
108-60-1	2,2´-oxybis(1-chloropropane)	390	U
98-86-2	Acetophenone	390	U
106-44-5	4-Methylphenol	390	U
621-64-7	N-Nitroso-di-n-propylamine	390	U
67-72-1	Hexachloroethane	390	U
98-95-3	Nitrobenzene	390	U
78-59-1	Isophorone	390	U
88-75-5	2-Nitrophenol	390	U
105-67-9	2,4-Dimethylphenol	390	U
111-91-1	Bis(2-chloroethoxy)methane	390	U
120-83-2	2,4-Dichlorophenol	390	U
91-20-3	Naphthalene	390	U
106-47-8	4-Chloroaniline	390	U
87-68-3	Hexachlorobutadiene	390	U
105-60-2	Caprolactam	390	U
59-50-7	4-Chloro-3-methylphenol	390	U
91-57-6	2-Methylnaphthalene	390	U
77-47-4	Hexachlorocyclopentadiene	390	U
88-06-2	2,4,6-Trichlorophenol	390	U
95-95-4	2,4,5-Trichlorophenol	970	U
92-52-4	1,1´-Biphenyl	390	U
91-58-7	2-Chloronaphthalene	390	U
88-74-4	2-Nitroaniline	970	U
131-11-3	Dimethylphthalate	390	U
606-20-2	2,6-Dinitrotoluene	390	U
208-96-8	Acenaphthylene	390	U
99-09-2	3-Nitroaniline	970	U
83-32-9	Acenaphthene	390	U
51-28-5	2,4-Dinitrophenol	970	U
100-02-7	4-Nitrophenol	970	U
132-64-9	Dibenzofuran	390	U

1D

EPA SAMPLE NO.

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

SD-001

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: GSHHST SAS No.: _____ SDG No.: HST001

Matrix: (soil/water) SOIL Lab Sample ID: 0510597-001B

Sample wt/vol: 15 (g/mL) G Lab File ID: A\C30908.D

Level: (low/med) LOW Date Received: 10/20/05

% Moisture: 14.3 Decanted: (Y/N) N Date Extracted: 10/24/05

Concentrated Extract Volume: 1000 (µL) Date Analyzed: 10/25/05

Injection Volume: 2 (µL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: 6.0 Extraction: (Type) PFEX

CAS NO.	COMPOUND	CONCENTRATION UNITS: (µg/L or µg/Kg) UG/KG	Q
121-14-2	2,4-Dinitrotoluene	390	U
84-66-2	Diethylphthalate	390	U
86-73-7	Fluorene	390	U
7005-72-3	4-Chlorophenyl-phenylether	390	U
100-01-6	4-Nitroaniline	970	U
534-52-1	4,6-Dinitro-2-methylphenol	970	U
86-30-6	N-Nitrosodiphenylamine	390	U
101-55-3	4-Bromophenyl-phenylether	390	U
118-74-1	Hexachlorobenzene	390	U
1912-24-9	Atrazine	390	U
87-86-5	Pentachlorophenol	970	U
85-01-8	Phenanthrene	390	U
120-12-7	Anthracene	390	U
86-74-8	Carbazole	390	U
84-74-2	Di-n-butyl phthalate	390	U
206-44-0	Fluoranthene	390	U
129-00-0	Pyrene	390	U
85-68-7	Butyl benzyl phthalate	390	U
91-94-1	3,3´-Dichlorobenzidine	390	U
56-55-3	Benzo(a)anthracene	390	U
218-01-9	Chrysene	390	U
117-81-7	Bis(2-ethylhexyl)phthalate	390	U
117-84-0	Di-n-octyl phthalate	390	U
205-99-2	Benzo(b)fluoranthene	390	U
207-08-9	Benzo(k)fluoranthene	390	U
50-32-8	Benzo(a)pyrene	390	U
193-39-5	Indeno(1,2,3-cd)pyrene	390	U
53-70-3	Dibenzo(a,h)anthracene	390	U
191-24-2	Benzo(g,h,i)perylene	390	U

(1) Cannot be separated from Diphenylamine

1E

PESTICIDE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

102005-001

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: GSHHST SAS No.: _____ SDG No.: HST001

Matrix: (soil/water) SOIL Lab Sample ID: 0510597-001B

Sample wt/vol: 15 (g/mL) G Lab File ID: A00316.RAW

% Moisture: 14.3 Decanted: (Y/N) N Date Received: 10/20/05

Extraction: (Type) PFEX Date Extracted: 10/24/05

Concentrated Extract Volume: 5000 (uL) Date Analyzed: 10/25/05

Injection Volume: 0.5 (uL) Dilution Factor: 1.00

GPC Cleanup: (Y/N) N pH: 6.0 Sulfur Cleanup: (Y/N) N

CAS NO	COMPOUND	CONCENTRATION UNITS: (µg/L or µg/Kg) UG/KG	Q
12674-11-2	Aroclor 1016	39	U
11104-28-2	Aroclor 1221	78	U
11141-16-5	Aroclor 1232	39	U
53469-21-9	Aroclor 1242	39	U
12672-29-6	Aroclor 1248	39	U
11097-69-1	Aroclor 1254	39	U
11096-82-5	Aroclor 1260	39	U

U.S. EPA - CLP

1

INORGANIC ANALYSIS DATA SHEET

EPA SAMPLE NO

S-006883-102005-SD-001

Lab Name: H2M LABS, INC. Contract:

Lab Code: 10478 Case No. SAS No.: SDG No.: HST001

Matrix (soil/water): SOIL Lab Sample ID: 0510597-001

Level (low/med): LOW Date Received: 10/20/2005

% Solids: 85.7

Concentration Units (ug/L or mg/kg dry weight): MG/KG

CAS No.	Analyte	Concentration	C	Q	M
7429-90-5	Aluminum	10900		E	P
7440-36-0	Antimony	0.46	B	N	P
7440-38-2	Arsenic	12.3		N*E	P
7440-39-3	Barium	28.9			P
7440-41-7	Beryllium	0.46	B		P
7440-43-9	Cadmium	0.031	U		P
7440-70-2	Calcium	502	B	E	P
7440-47-3	Chromium	13.4			P
7440-48-4	Cobalt	4.8	B		P
7440-50-8	Copper	14.2			P
7439-89-6	Iron	13000			P
7439-92-1	Lead	13.8			P
7439-95-4	Magnesium	1480			P
7439-96-5	Manganese	164		N	P
7439-97-6	Mercury	0.082			CV
7440-02-0	Nickel	7.9			P
7440-09-7	Potassium	392	B	E	P
7782-49-2	Selenium	0.23	U		P
7440-22-4	Silver	0.070	U	N	P
7440-23-5	Sodium	34.1	B		P
7440-28-0	Thallium	0.20	U	N	P
7440-62-2	Vanadium	20.6			P
7440-66-6	Zinc	21.8			P

Color Before: BROWN Clarity Before: Texture: FINE

Color After: BROWN Clarity After: CLEAR Artifacts:

Comments:

Date Reported: 10/31/05