Supplemental Work Plan for Operable Unit 2

TransTechnology Site #1-30-101
Glen Head, New York

Prepared for:

Breeze-Eastern Corporation
700 Liberty Avenue
Union, NJ 07083

Prepared by:

Geomatrix Consultants, Inc.
90B John Muir Drive, Suite 104
Amherst, NY 14228
(716) 565-0624

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Geomatrix

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Glen Head, New York

1.0 INTRODUCTION

Geomatrix Consultants (Geomatrix) was retained by Breeze-Eastern Corporation (BEC), formerly known as TransTechnology Corporation (TTC), to prepare this Supplemental Work Plan (Supplemental Work Plan) for the property located at One Robert Lane in Glen Head, New York (Site). The Site location is shown on Figure 1. The Site is currently listed in the Registry of Inactive Hazardous Waste Disposal Sites in New York State as Site Number 1-30-101 with a Classification 2. The Site is being investigated and remediated in accordance with Order on Consent Index # W1-0913-02-02 executed between TTC and the New York State Department of Environmental Conservation (NYSDEC).

In a letter dated June 25, 2004, NYSDEC separated the Site remediation work into two Operable Units. Operable Unit 1 (OU-1) was designated by NYSDEC for soil remediation. Operable Unit 2 (OU-2) was designated by NYSDEC for groundwater on and off the Site as it relates or pertains to the Site. This Supplemental Work Plan is specifically focused on assessment and potential remediation of groundwater (OU-2).

1.1 PRIOR SUBMITTALS UNDER THE ORDER ON CONSENT

To date, the following documents required by the Order on Consent have been submitted to and approved by NYSDEC:

1. Remedial Investigation/Feasibility Study Work Plan (Geomatrix, July 2002). Approved by NYSDEC (letter dated September 27, 2002).

2. Remedial Investigation Report (Geomatrix, September 2005). Approved by NYSDEC (letter dated September 8, 2005).

3. Feasibility Study Report for Operable Unit 1 (Geomatrix, September 2005). Approved by NYSDEC (letter dated September 8, 2005).

4. Remedial Design/Remedial Action Work Plan (Geomatrix, June 2007). Approved by NYSDEC (letter dated July 10, 2007).

1.2 REMEDIAL INVESTIGATION CONCLUSIONS PERTAINING TO OU-2

The September 2005 RI Report presents the results of groundwater (i.e., OU-2) investigations conducted to date. Eleven groundwater monitoring wells were installed and sampled at the Site. On-Site monitoring well locations are shown on Figure 2. In addition, one off-Site well installed by NYSDEC as part of a regional study (see below) was sampled. The September 2005 RI Report presents the following conclusions with respect to OU-2:

1. The RI confirmed the results of the NYSDEC Preliminary Site Assessment Report for the Glen Head Groundwater Plume (September 2000) which showed that Site (and regional) groundwater has been impacted by apparent spillage of dry cleaning chemicals at current or former dry cleaning establishments located upgradient of the Site in the Village of Glen Head. The chemicals attributable to the dry cleaners are tetrachloroethene (PCE) and degradation products including trichloroethene (TCE).

2. The Site may also have contributed some TCE to groundwater, however, the amount is lower than the amount of chemicals already present in Upper Zone groundwater flowing onto the Site. Comparison of the results of chemical analyses of groundwater with results from the 1996 sampling suggest the chemical presence in groundwater at the Site has declined.

3. Groundwater flow at the Site occurs generally from south to north/northwest.

4. On-Site groundwater is not used for water supply. Future development plans for the Site do not contemplate development of an on-Site water supply.

5. The furthest downgradient wells at the Site (MW-7 and MW-8) indicate off-Site migration in groundwater is not occurring to the north from this area. However, it is possible that some off-Site migration may occur in a more northwesterly direction which would not be detected in wells MW-7 and MW-8.

It is the latter conclusion which precipitated the need for further investigation of OU-2. In its July 25, 2005 letter commenting on a prior draft of the RI Report, NYSDEC requested TTC prepare a supplemental work plan to improve the delineation of the nature and extent of

groundwater impacts associated with the Site, particularly with respect to potential migration in a northwesterly direction. This Supplemental Work Plan is presented herein.

1.3 INCORPORATION OF RI/FS WORK PLANS (JUNE 2002)

The approved RI/FS Work Plan contains the following which will be adopted for the Supplemental Investigations of OU-2:

Quality Assurance Project Plan	RI/FS Work Plan Appendix A
Field Sampling Plan	RI/FS Work Plan Appendix B
Health and Safety Plan	RI/FS Work Plan Appendix C
Community Air Monitoring Plan	RI/FS Work Plan Appendix D
Citizen Participation Plan	RI/FS Work Plan Appendix E

Procedures contained in these plans will be followed during the Supplemental OU-2 Investigation as applicable.

The remainder of the Supplemental Work Plan for OU-2 is organized as follows:

Section 2.0	Supplemental OU-2 Investigation Scope of Work
Section 3.0	Field Procedures
Section 4.0	Sampling and Analysis Plan
Section 5.0	Deliverables
Section 6.0	OU-2 Feasibility Study Scope of Work
Section 7.0	Project Schedule

2.0 SUPPLEMENTAL OU-2 INVESTIGATION SCOPE OF WORK

2.1 SUPPLEMENTAL OU-2 INVESTIGATION OBJECTIVES

The objective of the Supplemental OU-2 Investigation is to provide additional data sufficient for characterization of the nature and extent of chemical presence in groundwater attributable to past releases at the Site.

2.2 ADDITIONAL DATA NEEDS FOR OU-2

The NYSDEC letter dated July 25, 2005 noted that groundwater could be migrating from the Site in a northwesterly direction and implied that the existing Site downgradient monitoring wells may not be positioned to adequately detect such migration. In a letter dated February 6, 2008 which presented comments on a previous version of this Work Plan (submitted October 2005), NYSDEC requested the following:

- Provide procedures to delineate the full nature and extent of groundwater contamination, including samples from greater than 200 feet below ground surface (bgs)

- Obtain hydraulic head measurements from all monitoring wells at the Site

To assess whether off-Site migration has occurred, it will be necessary to collect groundwater hydraulic head and chemistry data from one or more locations off-Site (along the possible northwest groundwater flow vector from the central portion of the Site). To address the NYSDEC request for deeper groundwater sampling (as presented in the February 6, 2008 letter), "groundwater profiling" technology will be employed. This technology was recommended by NYSDEC personnel in followup conversations concerning the February 6, 2008 letter.

The RI Report determined that potentially Site-related chemicals of potential concern present in the groundwater were Volatile Organic Chemicals (VOCs). Therefore, the samples collected during the Supplemental OU-2 Investigations will be analyzed for VOCs.

The Scope of Work to address these data needs is presented in Section 2.3.

2.3 SUPPLEMENTAL OU-2 INVESTIGATION TASKS

The Supplemental OU-2 Investigation will be completed in two phases. Phase 1 will consist of the on-Site groundwater sampling activities. Phase 2 will consist of off-Site groundwater sampling, the specifics of which will be determined based on the on-Site results.

The Scope of Work for the Supplemental OU-2 Investigation will consist of the following investigation tasks:

- Task 1: Hydraulic Head Monitoring
- Task 2: Groundwater Profiling
- Task 3: Groundwater Sampling and Analysis from Selected On-Site Monitoring Wells
- Task 4: Off-Site Monitoring Well Installation and Development (Phase 2 Supplemental OU-2 Investigation)

These tasks are described in detail below.

2.3.1 Task 1: Hydraulic Head Monitoring

Quarterly hydraulic head measurements will be obtained from the 11 existing monitoring wells. The monitoring event will occur before the groundwater profiling (see below). Hydraulic head monitoring procedures are described in Section 4.0 (Sampling and Analysis Plan).

2.3.2 Task 2: Groundwater Profiling

Depth discrete groundwater samples will be collected from boreholes advanced at two locations along the western perimeter of the Site as shown on Figure 3. The holes will be advanced to a total depth of approximately 220 feet bgs. Groundwater samples will be collected from the following depths:

- top two feet below the water table (estimated to occur at 100 feet bgs)
- at intervals of 10 feet to a depth of 60 feet below the water table
- at intervals of 20 feet from 60 feet to approximately 120 feet below the water table

Groundwater samples will be analyzed for VOCs using either a standard on-Site mobile laboratory or off-Site laboratory. The results of the groundwater profiling will be used (in conjunction with the hydraulic head monitoring and on-Site groundwater sampling (see below) to identify the appropriate location(s) and depth (s)of the off-Site monitoring well(s).

2.3.3 Task 3: Groundwater Sampling (On-Site Monitoring Wells)

Three existing Site monitoring wells (MW-2, MW-9, and MW-10) will be sampled for analyses of Target Compound List Volatile Organic Chemicals (TCL VOCs). Samples will also be

analyzed for natural attenuation indicators (methane, ethane, ethene, nitrate, nitrite, sulfate, sulfide, alkalinity, hardness, dissolved organic carbon, chloride, magnesium, manganese, calcium, and iron). Groundwater sampling and analytical procedures will be as described in Section 4.0 (Sampling and Analysis Plan).

The groundwater monitoring wells will be sampled prior to determining the locations of the one or more off-Site monitoring well locations so that the analytical results can be considered.

2.3.4 Task 4: Off-Site Groundwater Investigation (Phase II OU-2 Investigation)

Phase 2 will consist of the off-Site groundwater sampling activities. One or more new groundwater monitoring wells will be installed in the off-Site area west of the Site. The location(s) and depths of these wells will be determined based on the results of the groundwater profiling, hydraulic head measurements and sampling of existing wells.

Monitoring well installation, development and sampling procedures are presented in Section 3.0.

3.0 FIELD PROCEDURES

3.1 GROUNDWATER PROFILING PROCEDURES

BEC plans to retain Stone Environmental to conduct the groundwater profiling. Stone Environmental has conducted numerous projects on Long Island for projects under NYSDEC jurisdiction. At each boring location, a 6-inch diameter temporary steel casing will be advanced via drive and wash methods to a depth approximately 10 feet above the saturated zone. Groundwater elevations in the vicinity of each proposed boring will be determined through the collection of a round of water levels in nearby Site monitoring wells. Following the installation of the steel casing, a mud-rotary borehole will be advanced with a $5\ ^{7}/_{8}$-inch roller bit to the top of the first selected sample interval. Groundwater samples will be collected at 10 or 20 foot intervals (see Section 2.3.2) with the Waterloo Profiling tool. The Waterloo Ground Water Profiler is a direct-push device which allows the collection of several depth-discrete interval samples in a single borehole while minimizing vertical cross-contamination across these intervals. The profiler is driven with the drill rig hydraulics directly ahead of the temporary casing, or mud-rotary borehole. When the selected depth interval has been reached, a small volume of groundwater is drawn into the sampler, and conveyed to the ground surface within stainless steel or Teflon-lined tubing via compressed nitrogen. The sample volume from each interval is transferred into laboratory supplied 40mL glass vials at the surface. The sampler and associated tubing is purged following the collection of each groundwater sample to ensure that subsequent samples are representative of each interval.

Samples will be analyzed for select chlorinated VOCs including TCE, PCE, and degradation products of these chemicals, as appropriate.

Stone Environmental will provide an on-Site laboratory with GC/MS capability to provide near real-time VOC concentration results. The usage of the on-Site lab will expedite field decisions, should a change in sample collection depth or frequency be required.

3.2 MONITORING WELL INSTALLATION AND DEVELOPMENT PROCEDURES

3.2.1 Drilling Procedures

Prior to drilling, all downhole equipment will be decontaminated in accordance with the Field Operating Procedure (FOP) for non-disposable equipment contained in the Field Sampling Plan (RI/FS Work Plan, Appendix B). Boreholes for the two new monitoring wells will be drilled as follows:

1. Boreholes will be advanced using 4 ¼ -inch inside diameter (ID) continuous flight hollow stem augers.

2. Boreholes will be advanced to approximately 20 feet below the water table (upper zone monitoring well) and 45 feet below the water table (lower zone monitoring well) or to another depth as determined to be appropriate based on Phase 1 results.

3. Monitoring wells will be constructed in the boreholes as described in Section 3.2.2.

3.2.2 Monitoring Well Construction

The monitoring well installations will be completed as follows:

1. A 20-foot length of 2-inch diameter polyvinyl chloride (PVC) screen (#10 slot) will be attached to a suitable length of 2-inch diameter PVC riser pipe and placed to the bottom of the borehole. All joints will be flush-threaded;

2. #1 Silica sandpack (Jessie Morie) will be installed in the annulus to a height of approximately two feet above the top of the screen as the 4 ¼ -inch diameter augers are removed;

3. A 2-foot bentonite pellet or slurry seal will then be installed above the sandpack;

4. A 6-inch layer of Jesse Morie #00 sand will be placed above the bentonite seal;

5. The annular space to within 3 feet of the ground surface will be filled with cement/bentonite grout via tremie pipe;

6. The remaining annular space will be subsequently filled with concrete to within one foot of groundwater surface to stabilize the 2-inch riser pipe;

7. The monitoring well will be completed with a concrete collar measuring 2 feet square by 1 foot thick (BGS) which will be sloped away from the well to provide drainage; and

8. A 6-inch diameter flush-mount protective steel casing (road box) will be placed over the monitoring well and set into the concrete.

9. A vented, lockable mechanical plug will be used to secure the PVC well head.

After completion of the monitoring well installation, the measuring point elevation (marked on the 2-inch riser pipe) will be surveyed by a licensed surveyor to within 0.01-foot accuracy (relative to the Site datum).

Following installation, the monitoring wells will be developed to remove fine grained sediment and improve the hydraulic connection between the well and the surrounding formation. The wells will be developed using a 2-inch submersible pump and polyethylene tubing. Prior to development, the pump will be decontaminated as described above. Well volumes will be calculated using the static water level measurement and installed depth. The static water level in the well will be measured using an electric water level tape. The pump intake will be placed within the screened interval during development.

During development, the wells will be surged periodically by raising and lowering the pump. Development will continue until the purge water is cleared of fine grained sediment or until a maximum of ten static well volumes has been removed.

4.0 SAMPLING AND ANALYSIS PLAN

The Sampling and Analysis Plan (SAP) for the Supplemental OU-2 Investigation is summarized on Table 1. As noted in Section 1.2, the following plans previously submitted in the approved RI/FS Work Plan (June 2002) are incorporated into this SAP:

Plan	*June 2002 RI/FS Work Plan Appendix*
• Quality Assurance Project Plan (QAPP)	Appendix A
• Field Sampling Plan (FSP)	Appendix B
• Health and Safety Plan (HASP)	Appendix C
• Citizen Participation Plan (CPP)	Appendix D

4.1 FIELD INVESTIGATIONS

All field investigations will be conducted in accordance with the QAPP (RI/FS Work Plan Appendix A), FSP (RI/FS Work Plan Appendix B), and the HASP (RI/FS Work Plan Appendix C), except low flow sampling methods will be used to collect the groundwater samples (see Section 4.2). Detailed Field Operating Procedures (FOPs) are included in the QAPP (RI/FS Work Plan Appendix A).

As described in the QAPP, groundwater sampling activities and observations will be recorded on Geomatrix standard field forms (including results of field measured parameters).

All field monitoring equipment will be calibrated in accordance with the manufacturer's recommendations and recorded on the sampling forms. The sampling devices used to monitor environmental conditions at the Site will be clearly marked on sampling forms.

4.2 GROUNDWATER SAMPLING METHODS (MONITORING WELLS)

Low flow purging will be accomplished using a submersible pump. Groundwater will be discharged to a flow-through cell to measure pH, specific conductance, dissolved oxygen and temperature. In addition, turbidity will be measured using a portable field turbidity meter. Purging will be considered completed when the pH, Eh, specific conductivity and temperature have stabilized; and when the turbidity is below 5 NTU, or has stabilized above 5 NTU. Stability is defined as variation between measurements of 10 percent or less and no overall upward or downward trend in the measurements. Water removed during purging will be containerized for temporary on-Site storage and proper off-Site treatment/disposal.

4.3 SAMPLE ANALYSES (MONITORING WELLS)

The methods and parameters lists for TCL VOCs are included in Table 2. Methods and parameter lists for natural attenuation indicators are included in Table 3. Quality control and quality assurance samples and frequencies (for are described in the QAPP included in RI/FS Work Plan Appendix A.

5.0 DELIVERABLES

5.1 TECHNICAL MEMORANDUM: RESULTS OF TASKS 1, 2, AND 3

The results of the Phase 1 activities (hydraulic head monitoring (Task 1), groundwater profiling (Task 2), and sampling of existing Site monitoring wells (Task 3)) will be provided in a Technical Memorandum to NYSDEC. The Technical Memorandum will present recommendations for one or more off-Site wells based on the results of these tasks (Phase 2 Supplemental OU-2 Investigation).

5.2 SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT FOR OU-2

After completion of the Phase 2 activities, the Supplemental RI Report for OU-2 will be prepared. The Supplemental RI Report will include: a description of the investigative methodologies and any activities that deviated from the NYSDEC-approved work plan; a geologic and hydrogeologic interpretation of the site conditions; and presentation of analytical data with comparisons to regulatory standards. The Supplemental RI Report will also include an assessment of the need for additional remedial measures or additional study with specific recommendations as appropriate. The Supplemental RI Report will contain an Executive Summary and present information in a logical manner which describes the field investigation activities and results. As requested in NYSDEC's July 25, 2005 letter it will include a summary of all past Site data and the Preliminary Site Assessment (for the Glen Head regional plume) conducted by NYSDEC in September 2000. It will include isopleth maps depicting the extent of VOC presence in groundwater.

In accordance with the Consent Order, the RI Report will include a certification that all requirements of the Work Plan have been complied with and all activities have been performed in full accordance with the Work Plan. The person with primary responsibility for the day to day performance will certify the RI activities.

The final Supplemental RI Report (including text, figures, maps and data) will also be submitted in an electronic format acceptable to the NYSDEC.

6.0 OU-2 FEASIBILITY STUDY SCOPE OF WORK

A Feasibility Study (FS) for OU-2 will be performed to evaluate remedial actions which may be required to address groundwater impacted by the Site. The FS will be prepared based on the findings of the Supplemental RI for OU-2.

At a minimum, the FS will include the following:

1. Development of Remedial Action Objectives
2. Identification of Applicable Technologies and Development of Remedial Alternatives
3. Remedial Alternatives Evaluation and Recommendation for Selected Remedial Alternative

It is anticipated the FS Report will contain the following sections:

- Executive Summary
- Introduction, Project Objectives and Site Background.
- Summary of Supplemental Remedial Investigation of OU-2
- Development of Remedial Action Objectives and General Response Actions.
- Identification and Screening of Remedial Technologies.
- Initial Screening of Remedial Alternatives.
- Analysis of Alternatives.
- Recommended Remedial Alternative.

The potentially feasible technology options for site remediation will be identified for each general response action, and the results of the remedial technologies screening will be described. Remedial alternatives will be developed by combining the technologies identified in the previous screening process.

Remedial alternatives will be comparatively evaluated following the process specified in the *"Interim Guidance for Conduction RI/FS under CERCLA"* (USEPA, 1988). In the guidance, a set of nine evaluation criteria has been developed that is to be applied in the evaluation of each

Remedial Alternative. These criteria will be used to select a final recommended remedial alternative.

7.0 PROJECT SCHEDULE

The project schedule for the completion of the Supplemental RI and FS for OU-2 will be provided after this work plan is approved by NYSDEC.

TABLES

TABLE 1

SAMPLING AND ANALYSIS PLAN

Remedial Investigation/Feasibility Study Work Plan
TransTechnology Corporation Glen Head Site
Glen Head, New York

Sample Type/Location[1]	Matrix	Parameter	Quantity[3]	Container Type	Minimum Volume	Preservation (Cool to 4° >2 °C for all samples)	Holding Time from VTSR
Existing Groundwater Monitoring Wells	water	TCL VOCs[2]	3	glass vial	40 ml	HCl to pH<2	10 days
		pH	3	field measured			
		Specific Conductivity	3	field measured			
		Temperature	3	field measured			
		Turbidity	3	field measured			
		Natural Attenuation Indicators	3	various	various	various	various
Off-Site Monitoring Wells	water	TCL VOCs	TBD[4]	glass vial	40 ml	HCl to pH<2	10 days
		pH	TBD	field measured			
		Specific Conductivity	TBD	field measured			
		Temperature	TBD	field measured			
		Turbidity	TBD	field measured			
		Natural Attenuation Indicators	TBD	various	various	various	various
Groundwater Profile Boreholes	water	VOCs[5]	20	glass vial	40 ml		NA - field laboratory

Notes:

[1] Proposed sample locations are provided in Figure 3 of the Work Plan.

[2] Sample analysis to be conducted in accordance with NYS ASP 2000 methods

[3] Sample quantity does not include QA/QC samples. Sample frequency of QA/QC samples is detailed in Section 3 and Section 7 of the QAPP.

[4] The number of off-site monitoring wells will be determined based on the results of the on-site groundwater profiling.

[5] These samples will be analyzed for selected VOCs using an on-Site mobile laboratory.

Acronyms:

TCL VOC = Target Compound List Volatile Organic Compounds
VTSR=Verified Time of Sample Receipt

TABLE 2

TARGET COMPOUND LIST
OLM 04.2 VOLATILE ORGANIC COMPOUNDS

Supplemental Remedial Investigation/Feasibility Study Work Plan for OU-2
TransTechnology Corporation Glen Head Site
Glen Head, New York

Analyte	
1,1,1-Trichloroethane	Chloromethane
1,1,2,2-Tetrachloroethane	cis-1,2-Dichloroethene
1,1,2-Trichloroethane	cis-1,3-Dichloropropene
1,1,2-Trichloro-1,2,2-trifluoroethane	Cyclohexane
1,1-Dichloroethane	Dibromochloromethane
1,1-Dichloroethene	Dichlorodifluoromethane
1,2-Dibromo-3-chloropropane	Ethylbenzene
1,2-Dichlorobenzene	Isopropylbenzene
1,2-Dibromoethane	Methyl Acetate
1,2-Dichloroethane	Methylcyclohexane
1,2-Dichloropropane	Methyl ethyl ketone
1,2,4-Trichlorobenzene	Methyl Isobutyl Ketone
1,3-Dichlorobenzene	Methylene chloride
1,4-Dichlorobenzene	Methyl tert-Butyl Ether
2-Hexanone	Styrene
Acetone	Tetrachloroethene
Benzene	Toluene
Bromodichloromethane	trans-1,2-Dichloroethene
Bromoform	trans-1,3-Dichloropropene
Bromomethane	Trichloroethene
Carbon Disulfide	Trichlorofluoromethane
Carbon tetrachloride	Vinyl Chloride
Chlorobenzene	o-Xylene
Chloroethane	m,p-Xylenes
Chloroform	

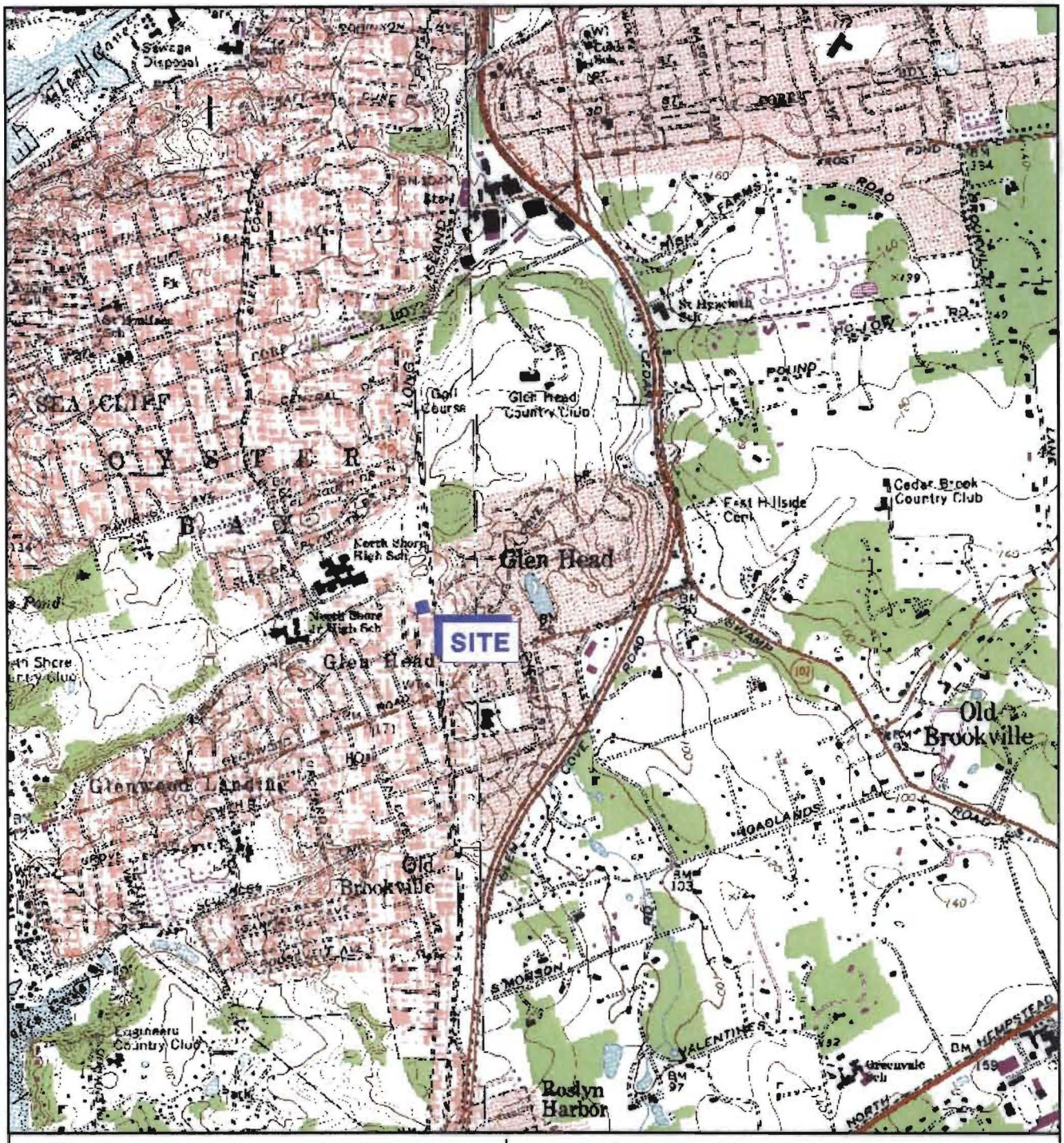
TABLE 3

NATURAL ATTENUATION INDICATORS

Supplemental Remedial Investigation/Feasibility Study Work Plan for OU-2
TransTechnology Corporation Glen Head Site
Glen Head, New York

Analyte and Analytical Method
Ethane by RSK175
Ethene by RSK 175
Methane by RSK 175
Chloride by SW8463 9251
Ferric Iron by SM18 3500FE-D
Ferrous Iron by SM18 3500D
Nitrate by MCAWW 353.2
Nitrite by MCAWW 353.2
Soluble Organic Carbon by SW8463 9060
Sulfate by SW8463 9038
Sulfide by MCAWW 376.2
Total Alkalinity by MCAWW 310.2
Total Hardness by MCAWW 130.2
Total Organic Carbon by SW846 9060

FIGURES

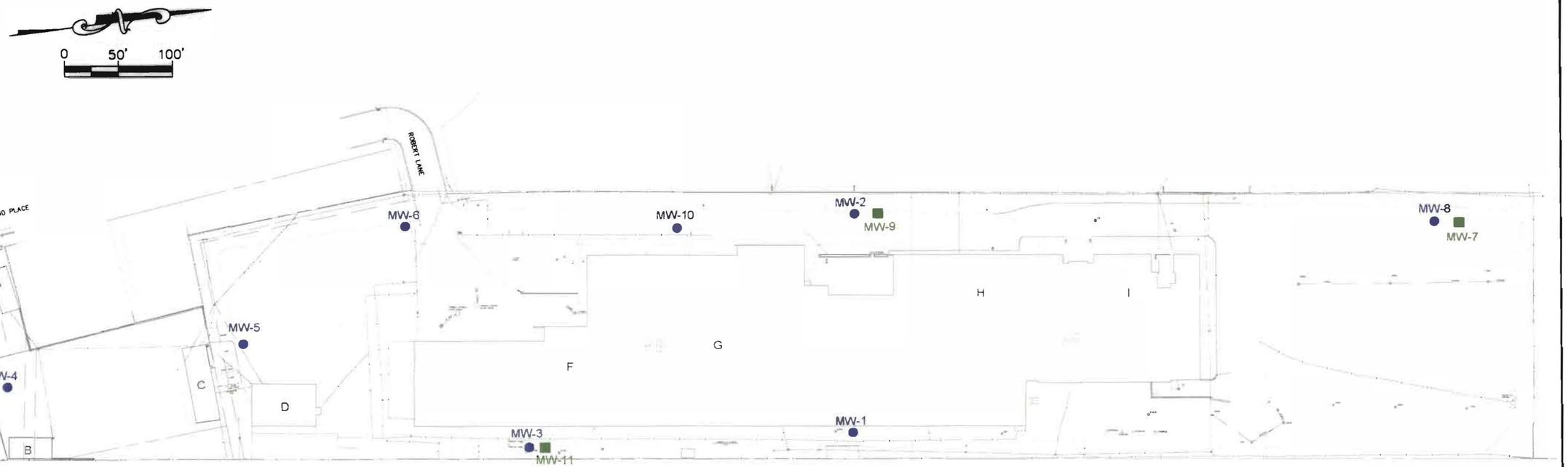


SOURCE:

USGS HICKSVILLE AND SEA CLIFF, NY QUADRANGLES.

figure 1

SITE LOCATION MAP
TRANSTECHNOLOGY SYSTEMS AND SERVICES
Glen Head, New York



LEGEND

MW-4 ● UPPER ZONE GROUNDWATER MONITORING WELL LOCATION

MW-7 ■ LOWER ZONE GROUNDWATER MONITORING WELL LOCATION

DATE: 04/02/2003
FILEPATH: C:\6238\6238-027
DRAFTED BY: JM

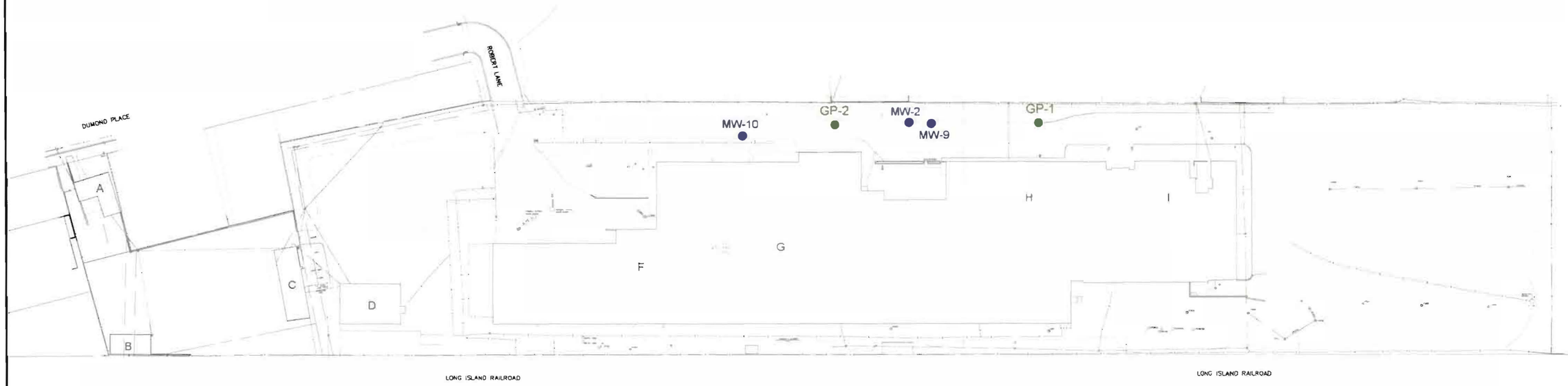
EXISTING MONITORING WELL LOCATIONS

TRANSTECHNOLOGY CORPORATION

GLEN HEAD, NEW YORK

GEOMATRIX	Project No. 6238	Figure 2

0 50' 100'



LEGEND

MW-4 ● EXISTING WELL TO BE SAMPLED

GP-1 ● GROUNDWATER PROFILE LOCATION

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GROUNDWATER SAMPLE LOCATION PLAN

TRANSTECHNOLOGY CORPORATION

GLEN HEAD, NEW YORK

GEOMATRIX	Project No. 6238	Figure 3