International Business Machines Corporation

9600 Godwin Drive
Manassas, VA 20110

August 8, 2000

Mr. Paul Merges
New York State
Department of Environmental Conservation
Bureau of Radiation and Hazardous Waste Management
50 Wolf Road
Albany, New York 12233-7251

Re: IBM Kingston Facility, Part 373 Permit No. 3-5154-00067/00090
Inactive West Demolition Debris Fill Area, SWMU AF

Dear Mr. Merges:

The purpose of this letter is to transmit the results of the investigation at the Inactive West Debris Fill Area Solid Waste Management Unit (SWMU) AF, located at the referenced facility. This investigation was conducted at Mr. Gary Casper's request based on his meeting with Mr. Dean Chartrand and Ms. Michele West of IBM on March 16, 2000. This report presents a brief review of the identification of the unit, a description of the unit, a brief discussion of the regulatory history of the unit, and results of the investigative field activities.

SWMU Identification Summary

The unit was first identified as part of property transaction activities. Review of an undated aerial photograph, showed that the area to the west of the Salt Barn location is undeveloped and generally planted in crops. The Salt Barn had not yet been constructed and based on building configuration at the main plant site, a reasonable date for the photograph is 1983. A single-lane, dead-end road is shown traversing the undeveloped area west of the present Salt Barn location, and ends in a position coincident with the break in slope at the edge of the flood plain of Esopus Creek. A bright line, roughly 200 feet long, trending generally north-south was evident on the photograph at the terminus of the dead-end road. No other areas which may have been disposal areas were apparent on the aerial photograph.

Following examination of the aerial photograph, the linear bright spot at the terminus of the dead-end road was examined in the field. This area is overgrown and could only be approached following trails from the west. Large pieces of concrete were observed in the overgrowth which had been placed on the slope between the higher area to the east and the flood plain of the Esopus Creek to the west. Sand and gravel, with occasional asphalt, were located in overlapping piles immediately to the east of the concrete at the edge of the slope.

DESCRIPTION OF UNIT

This unit is a small, inactive demolition debris disposal area. The disposal site consists of an area of loosely piled, large pieces of concrete debris and an adjacent area of more or less continuous sand and gravel piles. The concrete debris area is approximately 150 feet long and 15 feet wide. The adjacent sand and gravel pile is more or less continuous and parallels the concrete debris area. It is approximately 150 feet long, 4 feet wide and 2 feet high.

The concrete debris consists of curbs, the foundation for the security guard shack, foundations for light poles, and storm water catch basins. This debris resulted from demolition activities prior to the construction of B025. The sand and gravel (with occasional asphalt) originated from the former parking lot where B025 was constructed. It was also derived from demolition activities prior to the construction of B025. A former IBM employee personally familiar with the deposition of these wastes indicated that IBM was careful to include only "clean" material consisting of concrete, and sand and gravel removed from former parking lot area. This material was carefully placed in its current location. Demolition debris was placed in this unit over a relatively short period in 1982, prior to the construction of B025.

There are no known or suspected releases of hazardous wastes or hazardous constituents from this unit.

REGULATORY HISTORY

IBM notified the Commissioner of the identification of a this SWMU as per IBM's Part 373 Hazardous Waste Management Permit Condition III.C.1. on February 9, 1998. This debris fill area was first identified as part of property transaction activities. This unit is located west of the Salt Barn (Building 070) as shown on the attached Figure 1; it has been named the Inactive West Demolition Debris Fill Area and assigned SWMU designation AF. As per Permit Condition III.C.2., a SWMU Assessment Report was prepared and was submitted together with that notification. A copy of that Assessment Report is presented as an attachment to this report (Attachment A).

On March 16, 2000, IBM met with NYSDEC at the former Kingston Facility and conducted a field visit to the unit. Based on that field visit, an investigation work plan for this unit was to be prepared and submitted to the NYSDEC on March 31, 2000.

FIELD ACTIVITIES

Photographs were taken of the current site conditions prior to any field activities and are presented in Attachment B. Due to the significant rainfall at the site during the period immediately following receipt of approval of the work plan, field activities were postponed due to inaccessibility of the site by vehicle. Several attempts were made during that period to access the site. After a period of several days of clear weather, field activities were attempted and completed on May 26, 2000. Due to the rain and warmer spring temperatures dense undergrowth and brush had developed, as shown in the site photographs.

Using a backhoe, three of the sand and gravel piles, as located and noted on Figure 2, were opened crosswise from the west side (concrete piles side) to the east (undisturbed area). Following approved site protocols, soil samples were collected for jar headspace analysis and a description of the uncovered material was recorded by a geologist. A summary of field observations is presented in Attachment C. Based on the jar headspace results (all non-detect), no samples were submitted to a laboratory for analysis. In general, the soil piles consisted of well sorted, medium brown sand. There was no visible evidence of contamination in any of the three pits excavated or of the native soil. Furthermore, jar headspace results indicated did not confirm the presence of volatile organic compounds in either the soil piles or the native soil. Photographs of the site prior to excavation, excavation activities and pile contents are presented in Attachment B.

After reviewing the information provided in this transmittal, should you have any questions please call Dean Chartrand at (703) 367-1364.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely yours,

M. E. Meyers

Mitchell E. Meyers
Manager, Corporate Environmental Engineering

MEM:db

Attachments:	Figure 1:	Map, Inactive West Demolition Debris Fill Area, SWMU AF
	Figure 2:	Sample Excavation Profile
	Attachment A:	SWMU Assessment Report, Inactive West Demolition Debris Fill Area
	Attachment B:	Site Photographs
	Attachment C:	Field Result Summary
cc w/att:	Al Fuchs	NYSDEC Region 3
	Gary Casper	NYSDEC Albany
cc w/o att:	James Reidy	USEPA

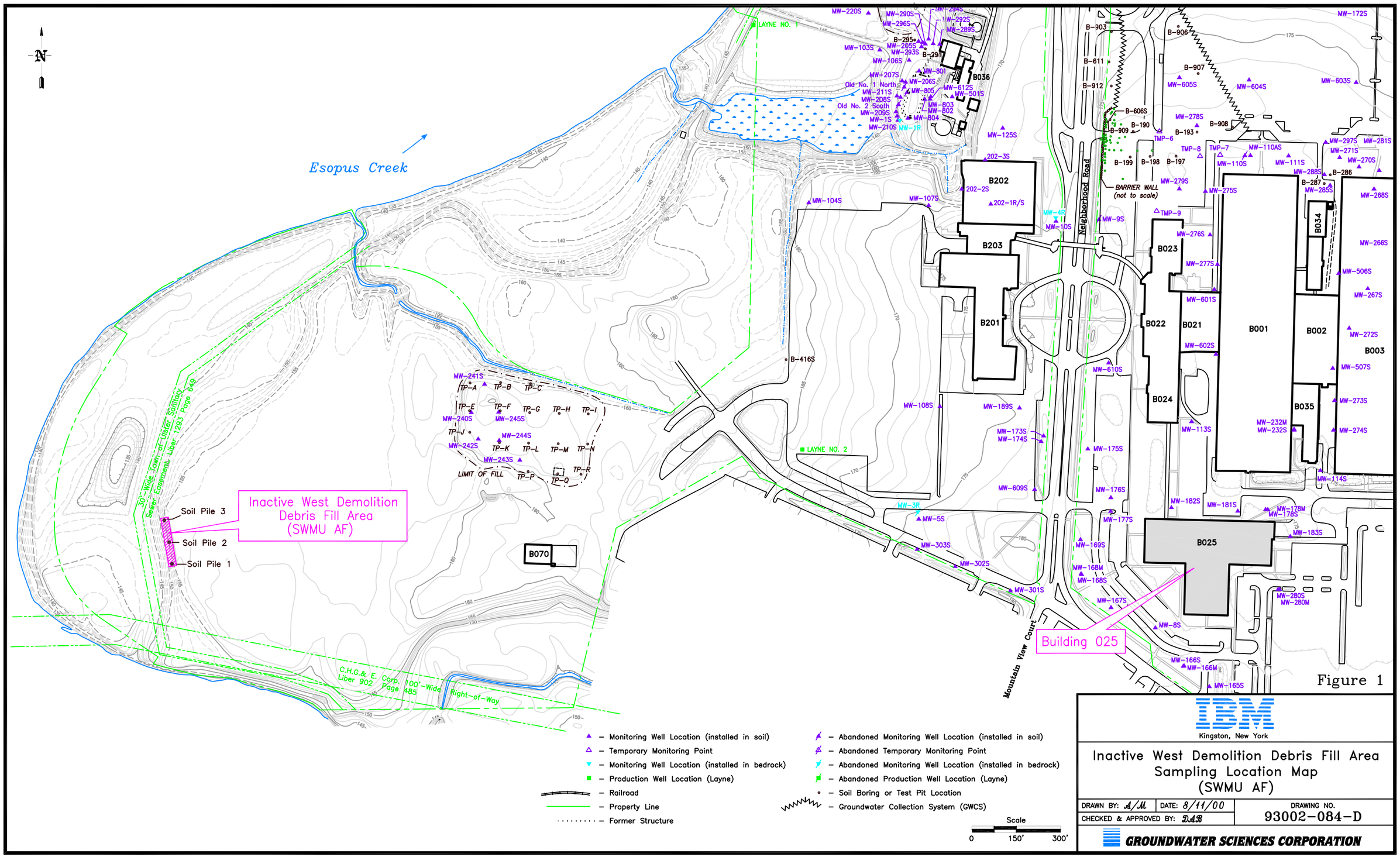

Figure 1

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Kingston, New York

Inactive West Demolition Debris Fill Area Sampling Location Map (SWMU AF)

DRAWN BY: A/M	DATE: 8/11/00	DRAWING NO. 93002-084-D
CHECKED & APPROVED BY: DAB		

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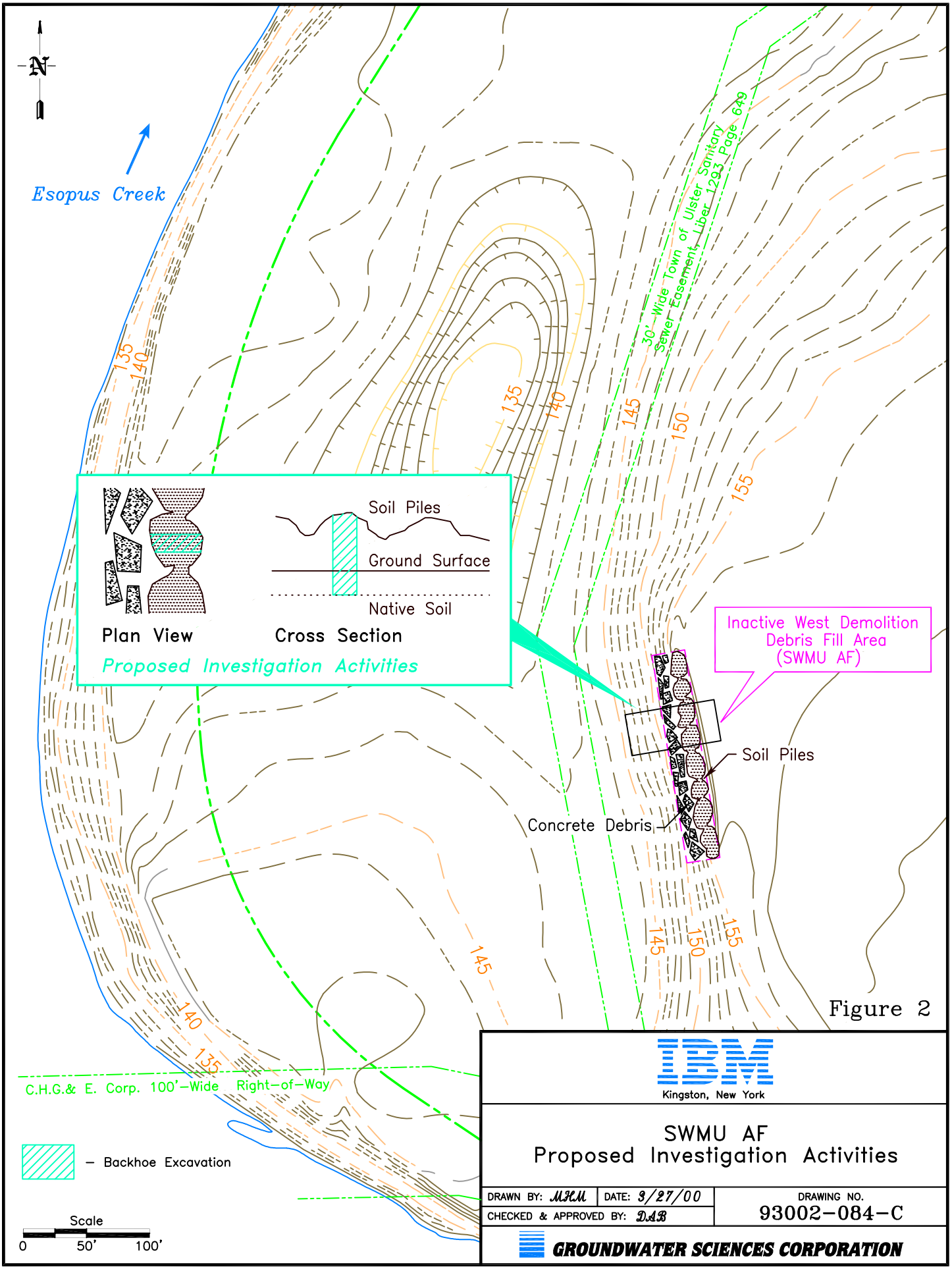

Figure 2

IBM
Kingston, New York

SWMU AF
Proposed Investigation Activities

DRAWN BY: MHM	DATE: 3/27/00	DRAWING NO. 93002-084-C
CHECKED & APPROVED BY: DAB		

GROUNDWATER SCIENCES CORPORATION

Attachment A

SWMU Assessment Report
Inactive West Demolition Debris Fill Area

SWMU Assessment Report
Inactive West Demolition Debris Fill Area
Solid Waste Management Unit AF

TYPE OF UNIT

This unit is a small, inactive demolition debris disposal area.

LOCATION OF UNIT ON A TOPOGRAPHIC MAP

(Refer to attached Figure)

DIMENSIONS, CAPACITIES AND STRUCTURAL DESCRIPTIONS

The disposal site consists of an area of loosely piled, large pieces of concrete debris and an adjacent area of more or less continuous sand and gravel piles. The concrete debris area is approximately 150 feet long and 15 feet wide. The adjacent sand and gravel pile is more or less continuous and parallels the concrete debris area. It is approximately 150 feet long, 4 feet wide and 2 feet high.

FUNCTION OF UNIT

This unit is a small, inactive demolition debris disposal area.

DATE UNIT OPERATED

Demolition debris was placed in this unit over a relatively short period in 1982, prior to the construction of B025.

DESCRIPTION OF THE WASTES PLACED IN THE UNIT

The concrete debris consists of curbs, the foundation for the security guard shack, foundations for light poles, and storm water catch basins. This debris resulted from demolition activities prior to the construction of B025. The sand and gravel (with occasional asphalt) originated from the former parking lot where B025 was constructed. It was also derived from demolition activities prior to the construction of B025. A former IBM employee personally familiar with the deposition of these wastes indicated that IBM was careful to include only "clean" material consisting of concrete, and sand and gravel removed from former parking lot area. This material was carefully placed in its current location.

DESCRIPTION OF KNOWN RELEASES FROM THE UNIT

There are no known or suspected releases of hazardous wastes or hazardous constituents from this unit.

SAMPLING RESULTS

Samples were not collected because there are no known or suspected releases of hazardous wastes or hazardous constituents from this small demolition debris area.

IS THIS UNIT A SIGNIFICANT SOURCE OF CONTAMINANT RELEASE?

There are no known or suspected releases of hazardous wastes or hazardous constituents from this unit.

Attachment B

Site Photographs

Soil Pile 1

Pre Excavation conditions at Soil Pile 1, May 26, 2000. Photo on right shows concrete blocks which lie to the west of the soil piles.

Excavation activities at Soil Pile 1.

Soil Pile 1 (continued)

Excavation activities. Photo on right shows limits of excavation, native soil at 5 feet below ground surface.

Limits of excavation (left photo). The photo on the right shows the soil pile 1 contents.

Soil Pile 2

Pre excavation (left photo) Soil Pile 2. Excavation preparations (right photo).

Excavation activities at Soil Pile 2.

Soil Pile 2 (continued)

Photos shows limits of excavation at Soil Pile 2, native soil at 3.5 feet below ground surface.

Limits of excavation - native soil (left photo). Soil pile 2 contents (right photo).

Soil Pile 3

Pre excavation activities Soil Pile 3 (photo left). Excavation of Soil Pit 3 (photo right).

Photos shows limits of excavation Soil Pile 3, native soil at 7 feet below ground surface.

Soil Pile 3 contents.

Attachment C

Field Documentation

Field Documentation SWMU AF

Soil Pile 1

Depth	Jar Headspace	Description
0 - 2.5 ft.	0 ppm	Dark brown f-m sand, somewhat compact.
2.5- 4.5 ft	0 ppm	same as above, slightly moist at 4.5 feet.
5 - 6.5 ft.	0 ppm	Yellow-brown fine sandy silt and silty fine sand (native soil at 5 feet).

Soil Pile 2

Depth	Jar Headspace	Description
0 - 2 ft.	0 ppm	Dark brown f-m sand.
2 - 3.5 ft.	0 ppm	Dark brown f-m sand, slightly damp.
3.5 - 5 ft.	0 ppm	Yellow-brown fine sandy silt and silty fine sand (native soil at 3.5 feet).

Soil Pile 3

Depth	Jar Headspace	Description
0 - 2.5 ft.	0 ppm	Dark brown f-m sand.
2.5 - 7 ft.	0 ppm	Dark brown f-m sand, damp at 5.5 feet.
7 -7.5 ft.	0 ppm	Yellow-brown to tan fine sandy silt and silty fine sand, wet (native soil at 7 feet).