DECLARATION STATEMENT - RECORD OF DECISION

Schenectady International - 10th Avenue Inactive Hazardous Waste Site
Operable Unit No.1
Schenectady, Schenectady County, New York
Site No. 447007

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedial action for Operable Unit No. 1 of the Schenectady International - 10th Avenue inactive hazardous waste disposal site which was chosen in accordance with the New York State Environmental Conservation Law (ECL). The remedial program selected is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40CFR300).

This decision is based upon the Administrative Record of the New York State Department of Environmental Conservation (NYSDEC) for the Schenectady International - 10th Avenue Inactive Hazardous Waste Site and upon public input to the Proposed Remedial Action Plan (PRAP) presented by the NYSDEC. A bibliography of the documents included as a part of the Administrative Record is included in Appendix B of the ROD.

Assessment of the Site

Actual or threatened release of hazardous waste constituents from this site, if not addressed by implementing the response action selected in this ROD, presents a current or potential threat to public health and the environment.

Description of Selected Remedy

Based upon the results of the Remedial Investigation/Feasibility Study (RI/FS) for the Schenectady International - 10th Avenue site and the criteria identified for evaluation of alternatives the NYSDEC has selected groundwater containment and treatment, plus collection and treatment of light non-aqueous phase liquid (LNAPL) for Operable Unit No 1. The components of the remedy are as follows:

- A remedial design program to verify the components of the conceptual design and provide the details necessary for the construction, operation and maintenance, and monitoring of the remedial system.

- The remedial system consisting of a “french drain” with a sufficient number of vertical wells to assure capture of contaminated groundwater leaving the site. The vertical wells will be located in area(s) where the installation of the “french drain” is not constructable due to topography and/or access.

- Collection of the groundwater and seep water and treatment either on-site or off-site (dependent upon cost), plus collecting the LNAPL and treating the LNAPL off-site.

- Institutional controls will be implemented. These controls are maintaining the security fence and placing appropriate deed restrictions.

- Since the remedy results in untreated hazardous waste remaining at the site, a long term monitoring program will be part of the remedy. This program will allow the effectiveness of the selected remedy to be monitored and will be a component of the operation and maintenance for the site. A soil remedy, if enacted through Operable Unit 2, might lead to future reduction of the required monitoring.

New York State Department of Health Acceptance

The New York State Department of Health concurs with the remedy selected for this site as being protective of human health.

Declaration

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that reduce toxicity, mobility, or volume as a principal element.

_____ _____

Date

Michael J. O'Toole, Jr., Director
Division of Hazardous Waste Remediation

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SECTION 1: SITE LOCATION AND DESCRIPTION

Schenectady International - 10th Street (SII) is a chemical manufacturing facility located since 1900 in the City of Schenectady, Schenectady County. It is Site No. 447007 on the NYS Registry of Inactive Hazardous Waste Sites. The site is approximately 7.0 acres in size and is located southwest of the intersection of 10th Street and Congress Street. Residences in a suburban neighborhood are 400 feet to the north and east of the site. Please refer to figures 1.1 and 1.2 for the location map and the site map, respectively.

The plant facility sits on a steep embankment. At the bottom of this embankment is Cowhorn Creek, a Class C stream (suitable for fish survival and propagation). Shallow groundwater moves in a southerly direction through the site, breaks out in seeps (along the embankment), flows to (then down) a swale along the southern fence line of the plant property, and ultimately to Cowhorn Creek. Individual seeps near a storm water outfall flow directly into the creek. A solvent smell is noticeable at these seeps.

Railroad tracks and a service road lie south of the site and outside of the security fence. A spur from the railroad and an area that previously contained tanks are uphill (partly up the embankment) from the swale and inside the security fence.

Based on the Remedial Investigation and Feasibility Study Reports, the NYSDEC has determined that it is beneficial to split this site into two operable units. Operable Unit No.1 will deal with the emerging contaminated groundwater, discharging to Cowhorn Creek, thus terminating this pathway to the environment.

Operable Unit No. 1, which is the subject of this PRAP, will consist of installing a “french drain” style water collection system in the swale area between the facility and the railroad tracks. Groundwater that reaches the swale area will be collected and treated. Please refer to figures 2.1 and 2.2 for the remedial system location and typical cross-section of the “french drain”, respectively.

An Operable Unit represents a portion of the site remedy which for technical or administrative reasons can be addressed separately to eliminate or mitigate a release, threat of release, or exposure pathway resulting from the site contamination. The remaining operable unit for this site **is** described in Section 3.2 below.

SECTION 2: SITE HISTORY

2.1: Operational/Disposal History

From the early 1900's to present, Schenectady International, Inc. has operated a manufacturing facility at the 10th Street site for insulating coatings and other chemical products. Spills, ranging from a few gallons to a few hundred gallons, over the period of operation have accumulated into a significant volume of contaminated soils. Contaminated soils are beneath the buildings, in transportation areas, southwest of the buildings and up to the “swale area” between the facility and the railroad tracks (see figure 3.1).

2.2: Remedial History

July, 1984: groundwater monitoring wells were installed and groundwater samples were taken. Results showed a contravention of groundwater standards for xylene, phenols, cresols, and naphthalene-based

hydrocarbons. These volatile and semivolatile compounds derive from the manufacturing processes at the 10th Street plant.
August, 1987: a Consent Order was signed to conduct a Hydrogeologic Investigation & additional groundwater monitoring wells were installed.

March, 1988: a Hydrogeologic Investigation was submitted and contamination confirmed. A Remedial Investigation/Feasibility Study (RI/FS) was recommended to locate and access the source(s) of the contamination and propose an appropriate remedy for the remediation of the site.

August, 1993: the NYSDEC signed a multi-media pollution prevention (M2P2) Consent Order (C. O.) with SII that included an RI/FS.

July, 1994: the M2P2 C.O. was modified to incorporate additional remedial activities necessary for the 10th Street plant.

Dec., 1994: the M2P2 C.O. was again modified.

Jan., 1996: the RI was submitted to the NYSDEC. Significant concentrations of site contaminants were found in the soils, groundwater, **off-site** surface water, and sediments of the swale and Cowhorn Creek.

July, 1996: the FS was submitted to the NYSDEC. Based on review of the alternatives, the NYSDEC has made the decision to split the site into two operable units. The first operable unit, (OU1), will address terminating the pathways by which the contaminants are being released off-site. As further discussed in this PRAP, the proposed means to address these pathways is groundwater collection and treatment. The collection system will be large enough to collect all groundwater, during a 24 hour-25 year rain event.

While the OU1 remedy will prevent further contamination of **off-site** surface water and groundwater, it does not address the long-term source of contamination: soils at the 10th Street facility. The soils will be addressed in the second operable unit (OU2) as described in the following paragraph.

Operable Unit No. 2

Additional study is needed to determine a remedy for the site's contaminated soils. NYSDEC's preference is for a remedy that will remove and/or destroy the contaminants, and thereby permanently eliminate the source of further contamination. There is some difficulty in accomplishing this as current SII plant operations prevent access to as much as 50% of the soils which need to be cleaned-up. Most of the site is covered by buildings, numerous utilities (e.g. pipe conduits) and an active railroad spur. Some remedial alternatives addressing soils were examined in July 1996 as part of the Feasibility Study; however, none were capable of addressing the inaccessible soils while allowing the plant operations to continue. Additional investigations will be performed by the responsible party to define the extent of soil contamination. Once this is done, a supplemental feasibility study will be performed and a remedy will be selected as appropriate.

SECTION 3: CURRENT STATUS

In response to a determination that the presence of hazardous waste at the Site presents a significant threat to human health and the environment, Schenectady International Inc. has recently completed an RI/FS.

3.1: Summary of the Remedial Investigation

The purpose of the RI was to define the nature and extent of any contamination resulting from previous activities at the site.

The RI was conducted in one phase, between October of 1994 and December of 1994. A report entitled "Remedial Investigation Report - Congress Street Plant" (dated January 1996) has been prepared and it describes the field activities and findings of the RI in detail.

The RI included the following activities:

- Soil gas survey and magnetometer *survey* to determine proper location of soil borings. The magnetometer survey was not successful due to metallic interference at the West loading dock (where drums are suspected to be buried).

- Installation of soil borings and collection of surface soils as well as subsurface soils. Installation of groundwater monitoring wells and the collection of groundwater samples to determine the hydro-geologic conditions.

- Collection of surface water and sediment samples from Cowhorn Creek to determine the current impact.

To determine which media (soil, groundwater, etc.) contain contamination at levels of concern, the RI analytical data was compared to environmental Standards, Criteria, and Guidance (SCGs). Groundwater, drinking water and surface water SCGs identified for the Schenectady International - 10th Street site were based on NYSDEC Ambient Water Quality Standards and Guidance Values and Part V of NYS Sanitary Code. NYSDEC TAGM 4046 soil cleanup guidelines for the protection of groundwater, background conditions, and risk-based remediation criteria were used as SCGs for soil, and the Division of Fish and Wildlife Technical Guidance for Screening Contaminated Sediments was used for sediments.

Based upon the results of the remedial investigation in comparison to the SCGs and potential public health and environmental exposure routes, certain areas and media of the site require remediation. These are summarized below. More complete information can be found in the RI Report.

Chemical concentrations are reported in parts per billion (ppb) and parts per million (ppm). For comparison purposes, SCGs are given for each medium.

3.1.1 Nature of Contamination:

The main contaminants of concern at the site are Cresols, Xylenes, Phenols, and Naphthalene-based compounds. All of these compounds are used in the chemical manufacturing process.

As described in the RI Report, many soil, groundwater, surface water and sediment samples were collected at the Site to characterize the nature and extent of contamination by the aforementioned compounds.

3.1.2 Extent of Contamination

Table 1 summarizes the extent of contamination for the contaminants of concern in soils, groundwater, and sediments. Table 1 also compares the data with the proposed remedial action levels (SCGs) for the Site. The following are the media which were investigated and a summary of the findings of the investigation. Please refer to Figures 3.1 and 3.2 .

Soil

Significant amounts of contamination were detected in subsurface as well as surface soils over a majority of the site. All of the contaminants of concern were found as high as 100 - 300 parts per million (ppm) in soils.

Sediments

All of the contaminants of concern were detected on-site in the swale "sediments". Napthalene was detected up to 11 ppm and Total phenols were detected up to 30 ppm. Sediments in Cowhorn Creek had phenols detected at 220 ppb (refer to Table 1 for comparison to standards).

Groundwater

All of the contaminants of concern were found in the 1 - 25 ppm range in one (or more) of the following monitoring wells: OW-3, OW-7A, and OW-11. A light non-aqueous phase liquid (LNAPL) with 4 - 5 percent Napthalene was discovered in OW-10.

Surface Water

Phenols and Napthalenes were detected up to 20 ppm (each) in the surface seep southwest of Building No. 7 (in the swale). Total phenols were detected up to 380 ppb at the seep West of the loading dock (SW-8). These seeps flow into Cowhorn Creek, the nearest surface water.

3.2 Interim Remedial Measures:

Interim Remedial Measures (IRMs) are conducted at sites when a source of contamination or exposure pathway can be effectively addressed before completion of the RI/FS.

An IRM is in the process of being designed for the collection of Light Non-Aqueous Phase Liquid (LNAPL) that was found in groundwater monitoring well OW-10. This LNAPL originated from a tank spill circa 1974 and is believed to be confined to the vicinity of OW-10.
The LNAPL will be collected in a smaller "french drain" system that is being proposed in the vicinity of OW-10 and OW-11. It is intended to remove as much of the LNAPL as possible before operation of the larger groundwater collection drain proposed as part of the OU1 remedy (Alternative 3 in section 7.1 of this PRAP). The closer the LNAPL is collected to the source, the less smearing of the LNAPL onto the soils will occur.

The contaminated soils that are the source of the LNAPL are not accessible at this time. The source will be properly addressed in OU2.

Other IRMs are possible, as part of the M2P2 Consent Order. The order is currently going through another modification to address unrelated issues at the Rotterdam Junction facility.

3.3 Summary of Human Exposure Pathways:

This section describes the types of human exposures that may present added health risks to persons at or around the site. A more detailed discussion of the health risks can be found in Section 7.0 of the RI Report.

An exposure pathway is how an individual may come into contact with a contaminant. The five elements of an exposure pathway are 1) the source of contamination; 2) the environmental media and transport mechanisms; 3) the point of exposure; 4) the route of exposure; and 5) the receptor population. These elements of an exposure pathway may be based on past, present, or future events.

The installation of a security fence around the site has greatly reduced the potential for human exposure to the on-site sediments and surface water. Possible pathways which may exist at the site include:

- ingestion of surface water by drinking.
- ingestion of sediments.
- dermal contact with affected surface water or affected sediments.

3.4 Summary of Environmental Exposure Pathways:

This section summarizes the types of environmental exposures which may be presented by the site. The Fish and Wildlife Impact Assessment included in the RI presents a more detailed discussion of the potential impacts from the site to fish and wildlife resources. The following pathways for environmental exposure have been identified:

- direct contact with affected surface water or affected sediments.
- ingestion of surface water for drinking.
- ingestion of sediments along with food.
- ingestion of affected terrestrial and/or aquatic animals and plants.

SECTION 4: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past or present owners and operators, waste generators, and haulers.

The PRP for the site, documented to date, is Schenectady International, Incorporated.

The NYSDEC and Schenectady International entered into a Consent Order in August of 1993. The Order obligates the responsible parties to implement a full remedial program. See also the discussion under Section 3.2: Remedial History of this PRAP concerning modification of this Order.

SECTION 5: SUMMARY OF THE REMEDIATION GOALS

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375-1.10. The overall remedial goal is to meet all Standards, Criteria, and Guidance (SCGs) and be protective of human health and the environment.

At a minimum, the remedy selected should eliminate or mitigate all significant threats to the public health and to the environment presented by the hazardous waste disposed at the site through the proper application of scientific and engineering principles.

The goals selected for OU1 at this site are:

- Mitigate the impacts of the contaminated groundwater to the environment (on-site and off-site).
- Prevent, to the extent possible, migration of contaminated groundwater (seep water) to Cowhorn Creek and the Mohawk River.
- Provide for attainment of SCGs for groundwater quality at the limits of the area of concern (AOC), to the extent feasible.

SECTION 6: SUMMARY OF THE EVALUATION OF ALTERNATIVES

The selected remedy should be protective of human health and the environment, be cost effective, comply with other statutory laws and utilize permanent solutions, alternative technologies or resource recovery technologies to the maximum extent practicable. As previously discussed, the RI/FS was originally intended to address the entire site. Results of the RI/FS have led to a division of the site into two operable units, the first addressing groundwater and surface water, and the second all on-site soils. Potential remedial alternatives for the Schenectady International - 10th Street site OU1 were identified, screened and evaluated in a Feasibility Study. This evaluation is presented in the report entitled "Feasibility Study Report - Congress Street Plant" (dated July 1996). While the FS report does include some alternatives to address the on-site soils (Alternatives 4, 5, 6, 7), they are not presented in this PRAP which is intended to address OU1.

A summary of the detailed analysis follows. As used in the following text, the time to implement reflects only the time required to implement the remedy, and does not include the time required to design the remedy, procure contracts for design and construction or to negotiate with responsible parties for implementation of the remedy.

6.1: Description of Alternatives

The potential remedies are intended to address the contaminated groundwater. Of the seven alternatives screened in the RI/FS, only those alternatives relevant to the groundwater and surface water are being considered.

On site soils will be addressed in OU2 at a later date.

Alternative 1:

No Action

The no action alternative is evaluated as a procedural requirement and as a basis for comparison. It requires continued monitoring only, for 30 years, allowing the site to remain in an unremediated state. This alternative would leave the site in its present condition and would not provide any additional protection to human health or the environment.

Present Worth:	$ 1,090,000
Capital Cost:	$ 0
Annual O&M:	$ 36,300
Time to Implement:	0 months

Alternative 2:

Institutional Measures

This alternative would be the implementation of institutional measures only. This alternative would strive to minimize human contact with the contaminated material associated with the entire property by establishing deed restrictions and maintaining the fence around the property.

Present Worth:	$ 1,160,000
Capital Cost:	$ 30,000
Annual O&M:	$ 38,700
Time to Implement:	6-12 months

Alternative 3:

Groundwater Hydraulic Containment Plus LNAPL Collection

Alternative 3 includes the institutional controls described in Alternative 2, groundwater collection and treatment on-site, LNAPL collection and treatment off-site, plus surface water and groundwater monitoring. Treatment cost is based upon construction and operation of a small, on-site facility. Other options include discharge to a publicly-owned treatment works (POTW) or to SII's wastewater treatment plant at the Rotterdam Junction facility. These options may be more cost effective and will be evaluated in the design phase.

Present Worth:	$ 3,680,000
Capital Cost:	$ 1,386,000
Annual O&M:	$ 76,500
Time to Implement:	6-12 months

6.2 Evaluation of Remedial Alternatives

The criteria used to compare the potential remedial alternatives are defined in the regulation that directs the remediation of inactive hazardous waste sites in New York State (6NYCRR Part 375). For each of the criteria, a brief description is provided followed by an evaluation of the alternatives against that criterion. A detailed discussion of the evaluation criteria and comparative analysis is contained in the Feasibility Study. The first two evaluation criteria are termed threshold criteria and must be satisfied in order for an alternative to be considered for selection.

1. Compliance with New York State Standards, Criteria, and Guidance (SCGs). Compliance with SCGs addresses whether or not a remedy will meet applicable environmental laws, regulations, standards, and guidance. Groundwater and surface water standards are applicable because contamination is migrating via groundwater and surface water to Cowhorn Creek and the Mohawk River.

Alternatives 1 and 2 would allow groundwater and surface water that exceed the standards for these media to migrate to Cowhorn Creek and ultimately the Mohawk River. Alternative 3, on the other hand, will intercept contaminated water and promote restoration of off-site waters to ambient quality standards.

2. Protection of Human Health and the Environment. This criterion is an overall evaluation of the health and environmental impacts to assess whether each alternative is protective.

Alternatives 1 and 2 are not protective of human health or the environment for the fact that SCG's would continue to be exceeded by a significant amount. These two alternatives will not be considered any further. Alternative 3, however, will significantly protect human health and the environment by intercepting contamination and preventing further exposure for off-site receptors.

The next five "primary balancing criteria" are used to compare the positive and negative aspects of the remaining alternative (alternative 3).

3. Short-term Effectiveness. The potential short-term adverse impacts of the remedial action upon the community, the workers, and the environment during the construction and/or implementation are evaluated. The length of time needed to achieve the remedial objectives is also estimated and compared against the other alternatives.

Alternative 3 does include the construction of a drain and treatment plant. However, the short term adverse effects will be minimal and the immediate benefits of collecting the groundwater for treatment far outweighs any construction difficulties.

4. Long-term Effectiveness and Permanence. This criterion evaluates the long-term effectiveness of the remedial alternatives after implementation. If wastes or treated residuals remain on site after the selected remedy has been implemented, the following items are evaluated: 1) the magnitude of the remaining risks, 2) the adequacy of the controls intended to limit the risk, and 3) the reliability of these controls.

Alternative 3 will be effective in the long term with respect to containment and risk reduction, but will not permanently eliminate contamination from the site. The OU2 supplemental RI/FS will seek to augment the

long-term effectiveness and permanence of the site remediation through identification of a feasible permanent treatment for on-site soils.

5. Reduction of Toxicity, Mobility or Volume. Preference is given to alternatives that permanently and significantly reduce the toxicity, mobility or volume of the wastes at the site.

Alternative 3 will collect and treat LNAPL, providing for a reduction in off-site impacts and compliance with SCGs.

6. Implementability. The technical and administrative feasibility of implementing each alternative are evaluated. Technical feasibility includes the difficulties associated with the construction and the ability to monitor the effectiveness of the remedy. For administrative feasibility, the availability of the necessary personnel and material is evaluated along with potential difficulties in obtaining specific operating approvals, access for construction, etc..

Alternative 3 will be readily implementable because no extraordinary construction methods, access or approvals will be required. In addition, the remedy is monitorable.

7. Cost. Capital and operation and maintenance costs are estimated for each alternative and compared on a present worth basis. Although cost is the last balancing criterion evaluated, where two or more alternatives have met the requirements of the remaining criteria, cost effectiveness can be used as the basis for the final decision. The costs for each alternative are presented in Table 2.

This final criterion is considered a modifying criterion and is taken into account after evaluating those above. It is focused upon after public comments on the Proposed Remedial Action Plan have been received.

8. **Community Acceptance**. Concerns of the community regarding the RI/FS reports and the Proposed Remedial Action Plan have been evaluated. The "Responsiveness Summary" included as Appendix A describes public comments received and the Department's response to concerns raised.

SECTION 7: SUMMARY OF THE SELECTED REMEDY

Based upon the results of the RI/FS, and the evaluation presented in Section 6, the NYSDEC is selecting Alternative 3 as the remedy for OU1 on the site. Alternatives 1 and 2, as discussed in the previous section, are not sufficiently protective of human health and the environment.

This selection is based upon the need to eliminate the migration of contaminated groundwater (that does not comply with the SCGs) as quickly as possible. The protection of human health and the environment can be secured through Alternative 3 until the true extent of contamination under the buildings and other structures can be determined as part of OU2.

The concern has been raised that treating a portion of the soils and leaving an unknown amount of contaminated soils in place could cause the re-contamination of the treated area as groundwater passes

through the site. It is believed that the collection and treatment of the groundwater will be needed for any alternative selected to address the contaminated soils, and can be designed to properly treat these waters for all the alternatives evaluated during OU2.

For these two reasons, we have recommended selection of Alternative 3 as a remedy for OU1, followed by a new investigation of on-site soils to provide for a soil remedy, which will complete remedial action for the whole site.

The estimated present worth cost to implement alternative 3 is $3,680,000. The cost to construct the remedy is estimated to be $1,386,000 and the estimated average annual operation and maintenance cost for 30 years is $76,500 annually.

The elements of the selected remedy are as follows:

- A remedial design program to verify the components of the conceptual design and provide the details necessary for the construction, operation and maintenance, and monitoring of the remedial system.

- The remedial system consisting of a "french drain" with a sufficient number of vertical wells to assure capture of contaminated groundwater leaving the site. The vertical wells will be located in area(s) where the installation of the "french drain" is not constructable due to topography and/or access.

- Collection of the groundwater and seep water and treatment either on-site or off-site (dependent upon cost), plus collecting the LNAPL and treating the LNAPL off-site.

- Institutional controls will be implemented. These controls are maintaining the security fence and placing appropriate deed restrictions.

- Since the remedy results in untreated hazardous waste remaining at the site, a long term monitoring program will be part of alternative 3. This program will allow the effectiveness of this remedy to be monitored and will be a component of the operation and maintenance for the site. A soil remedy, if enacted through Operable Unit 2, might lead to future reduction of the required monitoring.

SECTION 8: HIGHLIGHTS OF COMMUNITY PARTICIPATION

As part of the remedial investigation process, a number of Citizen Participation (CP) activities were undertaken in an effort to inform and educate the public about conditions at the site and the potential remedial alternatives. The following public participation activities were conducted for the site:

- A repository for documents pertaining to the site was established.

- A site mailing list was established which included nearby property owners, local political officials local media and other interested parties.

- In December 1997 a public meeting was held to inform the public of the availability of the repository and to discuss the Proposed Remedial Action Plan. Nineteen local residents attended the meeting and their questions were answered.

- In January 1998 the DEC, DOH, and representatives of the Responsible Party attended a meeting of the Mount Pleasant Neighborhood Association to further allow the local residents an opportunity to ask questions. The public comment period was extended to January 20, 1998.

- In February 1998 a Responsiveness Summary was prepared and made available to the public, to address the comments received during the public comment period for the PRAP.

Table 1
Nature and Extent of Contamination
Exceeding SCGs

MEDIA	CLASS	CONTAMINANT OF CONCERN	CONCENTRATION RANGE (ppb)	FREQUENCY EXCEEDS SCGs	SCG (ppb)
Groundwater	Volatile Organic Compounds (VOCs)	Xylene	ND to 24,000	9 of 48	5
		Ethylbenzene	ND to 3,900	8 of 48	5
		Toluene	ND to 220	3 of 48	5
	Semivolatile Organic Compounds (SVOCs)	Cresol (2-Methylphenol)	ND to 97	3 of 48	5
		Phenols	ND to 97	4 of 48	1
		Napthalenes	ND to 5300	9 of 48	10
Soils	Organic Compounds	Xylenes	ND to 1,600,000	15 of 36	1200
		Cresol	ND to 190,000	14 of 36	100
		Phenols	ND to 170,000	17 of 36	30
		Napthalenes	ND to 1,100,000	10 of 36	13,000
Sediments	Organic Compounds	Xylenes	ND to 26,000	2 of 6	1200
		Cresol	ND to 52,000	2 of 6	100
		Phenols	ND to 38,000	3 of 6	30
		Napthalenes	ND to 11,000	0 of 6	13,000

Table 2
Remedial Alternative Costs

Remedial Alternative	Capital Cost	Annual O&M	Total Present Worth
#1 -No Action	$0	$36,330	$1,090,000
#2 -Monitoring and Deed Restrictions	$30,000	$38,660	$1,160,000
#3 -Alternative #2 Plus Groundwater Containment Plus LNAPL Collection	$1,386,490	$76,500	$3,680,000