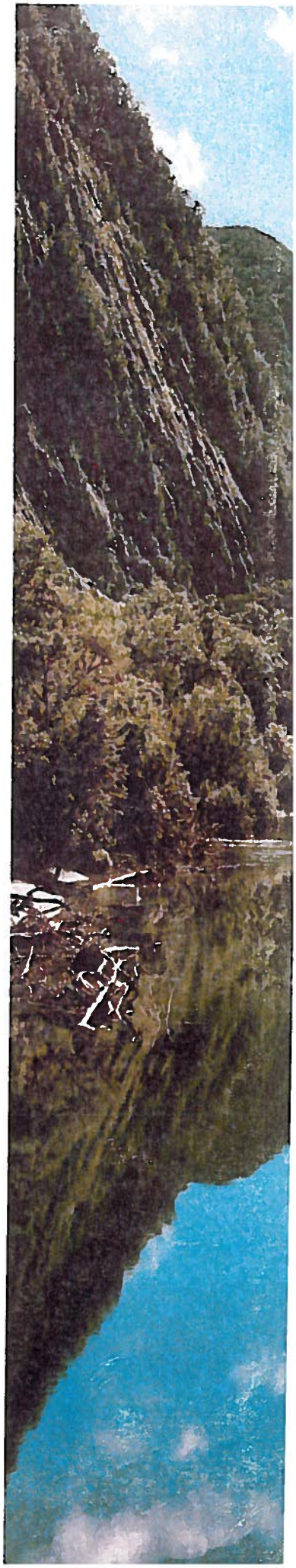
SPDES STORMWATER ACTION PLAN

2200 Bleecker Street
Utica, New York
SPDES Permit No. NY0108537

June 2000



SECOR
International Incorporated

SPDES STORMWATER ACTION PLAN

2200 Bleecker Street
Utica, New York
SPDES Permit No. NY0108537

June 2000

Prepared for:

New York State Department of Environmental Conservation
Division of Water Region 6
207 Genesee Street
Utica, New York 13501-2855

Prepared by:

SECOR International Incorporated
120 East Washington Street Suite 421
Syracuse, New York 13202

SECOR
International Incorporated

June 29, 2000

I, Paul M. Fisher, P.E., as a licensed Professional Engineer in the State of New York, certify that the State Pollution Discharge Elimination System (SPDES) Stormwater Action Plan for the former Chicago Pneumatic Tool Company in Utica, New York, has been prepared in accordance with good engineering practice.

Paul M. Fisher
New York P.E. No. 064064
SECOR International Incorporated
120 East Washington Street, Suite 421
Syracuse, New York 13202

TABLE OF CONTENTS

TABLES

FIGURES

APPENDICES

TABLE OF CONTENTS

TABLES

FIGURES

APPENDICES

1.0 INTRODUCTION

This State Pollutant Discharge Elimination System (SPDES) Stormwater Action Plan (Report) has been prepared to document the corrective actions and construction activities completed and identify additional contingency actions to address exceedances, if any, of permitted constituents in the surface water discharge from the property located at 2200 Bleecker Street, Utica, New York. This report is intended to satisfy the schedule of compliance requirements found at page 14 of the SPDES permit (No. NY 0108537).

The property was occupied and operated by the Chicago Pneumatic Tool Company until 1997. Currently the Chicago Pneumatic Tool Company remains the permittee, although it no longer owns or operates at the property.

The actions described in this Report were performed during a period when interim permit limitations were in effect as a result of a comprehensive Remedial Action (RA) being conducted pursuant to a New York State Department of Environmental Conservation (NYSDEC) Order on Consent (Index #B6-0491-96-04). In addition to the performance of the RA, additional measures were implemented at the site in anticipation of the final permit limitations going into effect on May 18, 2000 and to eliminate potential discharges which may cause exceedances of interim or final permit limitations.

1.1 Property Ownership and Responsibilities

Chicago Pneumatic Tool Company (CPT) retains responsibility for operation and maintenance of the groundwater treatment system and air stripper being operated as part of the RA. The air stripper discharges to SPDES Outfall 03A, which, in turn, comprises part of the discharges to Outfall 003. CPT remains the named permittee for SPDES permit requirements at Outfall 001, 002, and 003, although they no longer own or operate at the property. A groundwater treatment system operates in the former oil storage building. The system was installed in response to a petroleum release (NYSDEC Spill No. 95-02985) not associated with RA. CPT also retains responsibility for this treatment system. O'Brien & Gere is retained by CPT as the Project Manager to implement the SPDES permit sampling and reporting requirements. O'Brien and Gere also operates and maintains the groundwater recovery system and air stripper.

Danaher Corporation (Danaher) is implementing the RA, which was issued to and signed by CPT. Danaher retains ownership of the property in order to complete the RA; however, ownership is limited to the property and does not include the building and the ground beneath the buildings. SECOR International Inc. is retained by Danaher to execute the RA on behalf of Chicago Pneumatic.

The buildings and ground beneath the buildings are owned by Coolidge Utica Equities, LLC (Coolidge). The space within the buildings is in turn leased by Coolidge to various businesses. Section 7 of this report identifies the key project personnel.

1.2 Current Property Use

The property consists of a 77-acre lot in an industrial setting, bounded on the north by Bleecker Street, to the south by wooded and agricultural land, to the west by an unnamed creek that drains a wooded area, and to the east by property fence line bordering Industrial Park Drive. To the west and east are parking lots that are used by tenants for parking and staging trucks. The southern-most portion of the property is occupied by the Remedial Action Facility (RAF), which includes a soil containment cell and operating building associated with the RA discussed above. The RAF is fully enclosed by a perimeter fence and is accessible to authorized personnel only. The property and buildings are shown on Figure 1.

The facility buildings were constructed around 1948. The former manufacturing building is a brick and block structure, with concrete floors and structural steel members. The following summarizes the current use and tenants associated with the former manufacturing facility:

- Dodge Graphic Press: Located in the eastern portion of the building, Dodge Graphic Press is a commercial printer and binder.
- ICC: Located in the northeastern portion of the building, ICC manufactures infrared cameras.
- Burrows Paper: Located in the former foundry, receives recycled paper.
- Utica Converters: Located in the northwestern portion of the building, Utica Converters manufactures tire thread fabrics.

- Ace Movers: Located in the southwestern portion of the building, Ace Movers is a furniture moving/storage company.

- Beechgrove Warehouse: Located in the south-central portion of the building, Beechgrove Warehouse stores dry, non-hazardous goods.

- Partech: Located in the central portion of the building, Partech stores other manufacturers' goods.

The four additional structures are located on the property and the descriptions of the buildings are as follows:

- The former foundry building, which is constructed of brick and block walls, concrete floors, and structural steel support components. The current use of the building is storage of recycled paper products.

- The former oil storage building, which is constructed of brick and block walls, concrete floors, and structural steel support components. The building contains the groundwater recovery system, located in the northwest corner. The building also serves as storage for various construction materials, utilized by maintenance personnel.

- The former powerhouse, which is three story structure consisting of brick and block walls, concrete floors, and structural steel support components. Only the northern portion of the building is used for storage, the rest remains closed and inactive, there are no future plans to renovate or use the building.

- The former maintenance/storage garage, which is constructed with corrugated steel, concrete floor, and structural steel components. The building is currently used for storage.

1.3 Remedial Action Program

Based on environmental investigations conducted at the property, NYSDEC listed the site in the Registry of Inactive Hazardous Waste Disposal Sites (No. 622003). CPT entered into Order On

Consent with the NYSDEC and completed a Remedial Investigation/Feasibility Study (RI/FS). The NYSDEC issued a Record of Decision (ROD) that set forth the Remedial Action (RA) for the site in March 1996. CPT entered into Order On Consent with the NYSDEC to implement the RA. The RA was conducted in accordance with the requirement set forth in the NYSDEC-approved Remedial Design Specification (RDS). Danaher was responsible for implementing the RA on behalf of Chicago Pneumatic. The majority of the RA was completed in November 1999. Additional RA activities were ongoing through June 2000. Section 6 of this report provides a time line summarizing notable SPDES related corrective actions. Section 8 of this report provides a list of associated documents.

The RA addressed fourteen (14) areas of concern (AOC) by NYSDEC:

- Area-1 -- the un-named creek located in the west portion of the property;
- Area-2 and Area-3 -- the former chip chute area adjacent to the southern loading dock of the former manufacturing building;
- Area-4 -- the drainage ditch abject to the southern portion of the former manufacturing building;
- Area-5 -- the former oil skimmer pond;
- Area-6 -- the southern drainage ditch;
- Area-7 and Area-8 -- the former separation ponds;
- Area-9 and Area-10 -- the former debris landfill;
- Area-11 and Area-12 -- the offsite drainage ditches, north of Bleecker Street;
- Area-13 -- the former PCB area, located in the east parking lot; and
- Area-14 -- the onsite drainage ditch, east of the former manufacturing building.

The RA also included installation of a groundwater collection and treatment system that includes the associated air stripper unit located in the southeast portion of the former manufacturing

building. A containment cell is constructed on the adjoining parcel and contains impacted soil excavated as part of the RA. The Final Engineering Report (FER) is being prepared by SECOR that documents the RA.

The specific activities that were conducted in association with each SPDES Outfall in addition to the RA actions described above are discussed further within subsequent sections.

1.4 Overview of Interim and Final Permit

On August 28, 1998 a SPDES permit modification was issued and reissued on November 18, 1998 by NYSDEC to CPT to ensure compliance with the general conditions of the permit then in effect (which had been issued March 1, 1997). NYSDEC added additional requirements to the revised permit, including additional analytical parameters and testing frequency. The permit modification included interim and final effluent limitations for SPDES Outfalls 001 and 003, in addition to toxicity testing to be performed on the combined discharges at SPDES Outfalls 001 and 002. The intent of the interim permit limitations was to allow more flexible discharge limits while remedial actions were on-going and to allow the permittee time to implement any additional actions that might be necessary to achieve the more stringent final permit requirements.

The permit required compliance with final effluent limitations for SPDES Outfall 001 and 003 by May 18, 2000. Although the majority of the RA was completed in December 1999, additional remedial actions and facility stormwater modifications/corrective measures relative to the SPDES Outfalls 001 and 003 occurred after December 1999, the most recent activity being completed in June 2000.

1.5 Current Permit Status

The final effluent limitations for SPDES Outfalls 001 and 003 went into effect on May 18, 2000. The final effluent limits for SPDES Outfall 002 remain the same as the interim limits.

This SPDES Stormwater Action Plan Report describes the extensive efforts implemented to date to be able to consistently comply with the SPDES final effluent permit limits. Additionally, it identifies proposed contingency actions to be implemented, if approved by NYSDEC, in the

event that the final permit limits are exceeded in the future. Such contingency measures are proposed since, despite the good faith efforts made to date to ensure compliance, the age and complexity of the site, the numerous and potentially changing operations of tenants at the site who are not permitees and other considerations may effect the final compliance permit limits.

2.0 SPDES STORMWATER ACTION PLAN OBJECTIVES

As stated, this report has been prepared to document the corrective actions completed to date and to identify additional proposed contingency actions that may be necessary in the event of exceedances of permitted constituents in surface water discharges at the designated outfall locations.

The objectives include:

- Satisfying NYSDEC's requirement of an approvable engineering report detailing measures which are proposed to achieve final effluent limitations as set forth in the schedule of compliance in the SPDES permit;

- Demonstrating that pro-active corrective actions have been on-going at the property to remediate environmental conditions, focusing on those conditions associated with achieving SPDES permit compliance; and

- Establishing current property use and contributions to existing SPDES Outfalls 001, 002, and 003 such that the permit can be modified to reflect the current and anticipated site conditions, including, as appropriate, requiring the site operator or its tenants to be permitees, adjusting the analytical parameters and monitoring frequencies, eliminating outfalls that no longer receive discharges requiring a permit, and adjusting the sampling point or outfall point to facilitate overall permit objectives.

3.0 SPDES OUTFALL 001

SPDES Outfall 001 receives drainage emanating from the southwest portion of the property. The southwest stormwater system, which is monitored through SPDES Outfall 001, receives water from roof leaders along the southwest portion of the former manufacturing building and from the out buildings along the south side. This system also received other contributions that are reviewed in detail in this section. Historically, the analytical SPDES results identified constituents present at concentrations that, after May 18, 2000, would be above the final permit levels. Based on these data corrective actions were implemented.

Corrective actions include a review of original historic construction documents and a thorough site reconnaissance to identify all sources potentially contributing to SPDES Outfall 001. This report describes the process that was undertaken to eliminate inactive and unacceptable contributing sources, to replace the southwestern stormwater main pipeline, and to rehabilitate manhole MH-ST1. The proposed contingency actions to be implemented are identified if exceedances of final permit limits are encountered in the future.

Initially all available existing and historical sources of operational information were reviewed to develop a thorough understanding of known sources of discharge to the outfall. This data was used to support a systematic site reconnaissance, assisted by current facility production personnel where possible, to identify the point of origin of all pipes connected to the stormwater distribution system, to identify and demarcate all pipes allowed to remain, and to remove or permanently close-off all drains and other potential points of contribution that are not known or intended.

3.1 Historic Contributions to Outfall 001

The stormwater contributions associated with SPDES Outfall 001 that pre-dated the implementation of corrective actions described in this Report included the following (see Figures 1 and 3 and Table 1):

- Stormwater from the roof leaders located in the southwestern portion of the former manufacturing building (Column Line N25 through X53) (see Figure 3);

- Floor drains located in the southwestern portion of the former manufacturing building (Column Line N25 through X53);

- Condensate water from an air conditioning unit located in the southwestern portion of the former manufacturing building;

- Fire protection sprinkler drains located in the southwestern portion of the former manufacturing building;

- Standpipe drains, which received water from drinking fountains and eyewash stations located in the southwestern portion of the former manufacturing building;

- The drain pit located in the southwestern portion of the former manufacturing building (Column Line S53);

- One sump located in the former heat treatment basement in the former manufacturing building (Column Line W48);

- Two former tumble sumps located in the southwestern portion of the former manufacturing building (Column Line 047);

- Two sumps located to the former rock test room basement in the former manufacturing building (Column Line X40);

- Three southern roof leaders and one northern roof leader associated with the former foundry building;

- One sump located in the former foundry building conveyor pit;

- One sump and roof leader located in the former oil storage building, which were rerouted through a treatment system and discharged to the sanitary sewer in June 1995;

- One former roof leader, one large sump, and numerous floor drains associated with the former power plant;

- One sump, one pit, and three floor drains located in the former mechanics garage;

- One surface water catch basin located in the south access road; and

- Surface water along the southwestern portion of the site, contributing to the ditches (see Figure 1).

3.2 Historic Data Evaluation of Outfall 001

The current SPDES permit for Outfall 001 requires sampling, analytical analysis and flow analysis to show compliance, at the following frequencies:

- Weekly monitoring of Flow and pH;

- Monthly monitoring and analysis for Oil and Grease;

- Bi-monthly monitoring and analysis for Temperature, Total Suspended Solids (TSS), Total Phenolics, Total Antimony, Total Copper, Chloroform, 1,2-cis-Dichloroethylene (1,2-cis-DCE), 1,2-trans-Dichloroethylene (1,2-trans-DCE), and Trichloroethylene (TCE); and

- Semi-annual monitoring and analysis for Total Chromium, Total Fluoride, and Total Zinc.

Samples are collected at Alternate SPDES Outfall 001 (bottom of manhole MH-ST1) prior to the point at which it enters Area 1 (unnamed creek) (see Figure 1). Review of historic data from the previous 12 months of Discharge Monitoring Reports (DMR) indicate that Total Copper, Total Lead, 1,2-cis- DCE, and TSS (dry) have infrequently exceeded the interim permit limits during this period.

A summary of the DMR data is provided in Table 3.

The SPDES Outfall 001 parameters and permit limits have changed as of May 18, 2000, and are presented in the table below:

Parameter	Permit Limits
Oil & Grease	15 mg/L
TSS (dry)	10 mg/L
TSS (wet)	50 mg/L
Phenol	28 mg/L
Antimony	0.067 #/d
Chromium	51 ug/L
Copper	100 ug/L
Fluoride	2,500 ug/L
Lead	13 ug/L
Zinc	210 ug/L
Chloroform	0.010 ug/L
1,2-cis-DCE	10 ug/L
1,2-trans-DCE	10 ug/L
TCE	10 ug/L

Notes:
mg/L = milligrams per liter
#/d = pounds per day
ug/L = micrograms per liter

3.3 Historic Remedial Action Associated with Outfall 001

3.3.1 Interim Remedial Measures Associated with Outfall 001

The initial stormwater pipe sediment removal interim remedial measures (IRM) were conducted in the fall of 1996 and spring of 1997 to address the presence of inorganics detected in the sediments of the stormwater drains (outside the building) associated with SPDES Outfall 001. The stormwater drain sediment removal IRM consisted of removing sediments and residuals using high-pressure water sprays within the pipe (approximately 600 feet). The wash water was collected downstream at manhole MH-ST1 and disposed of properly. The IRM was completed with the exception of the section of stormwater drain between SPDES Outfall 001 and the upstream manhole (MH-ST1) (see Figure 1), due to flooding of the unnamed creek.

3.3.2 Remedial Actions Associated with Outfall 001

In September of 1998 the IRM associated with SPDES 001 were completed as part of the Remedial Action (RA) in accordance with the requirements set forth in the Remedial Design Specifications. The storm sewer was cleaned from SPDES Outfall 001 at Area 1 (unnamed creek) upstream to the manhole (MH-ST1), approximately 300 feet. A pipe inspection camera was employed to videotape this section of the pipe. This provided assurance that the stormwater pipe was clean and intact.

3.4 Southwestern Stormwater System Upgrades Associated with Outfall 001

The objective of the recent southwestern stormwater system upgrade was to evaluate/eliminate all unnecessary and inactive stormwater sources and replace a portion of the existing stormwater system.

Prior to initiating stormwater system upgrade activities, a site-specific work plan was developed using information obtained from historical drawings and site reconnaissance that occurred in the fall of 1999. This included review of contributing surface water as well as all buildings and their associated components. Acceptable sources to the stormwater drains were limited to roof leaders receiving rain water, sprinkler drains receiving fire protection water during maintenance, boiler water (no additives) drained during maintenance, non-contact cooling water and condensate water from the air conditioning.

The RA site-specific health and safety plan (HASP) was modified to reflect the work tasks associated with the stormwater upgrade plan. Prior to mobilization, all existing site conditions were identified, notification was made to building owner and tenants, and underground/overhead utilities were located. On- site construction activities occurred from March 28, 2000 through June 9, 2000.

3.4.1 Former Manufacturing Building

As part of the southwestern stormwater system upgrade, and prior to replacement of the stormwater piping, initial investigation and evaluation of all inactive and contributing sources was conducted within the manufacturing building. All sources associated with SPDES

Outfall 001 from the building are summarized on Table 1 and are located on Figure 3. These present a description of the contributing/inactive sources (i.e., roof leader, sump, drinking fountain, floor drain, sprinkler drain, boiler discharge, non-contact cooling and condensate water).

The detailed summary of contribution lines identified and the corrective measures implemented are as follows:

- Approximately Column Line P50, a non-operational drinking fountain drain was located that reportedly discharged to the stormwater drain. The corrective measure included installation of a 2-inch threaded cap on March 30, 2000, eliminating this contribution;

- Approximately Column Line R25, a non-operational drinking fountain was located that reportedly discharged to the stormwater drain. The corrective measures included disconnecting the drinking fountain from the drain and installation of a 2-inch threaded plug on March 30, 2000, eliminating this contribution;

- Approximately Column Line R40, an open floor drain was located that reportedly discharged to the stormwater drain. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing floor drain with Redi Plug (cement with polymer accelerant mixed with water) on April 21, 2000;

- Approximately Column Line R43, a drinking fountain drain was located that reportedly discharged the stormwater system. The corrective measure included sealing the 2-inch riser with Redi Plug on March 31, 2000;

- Approximately Column Line R47, a 1½-inch polyvinyl chloride (PVC) air conditioning condensate pipe was found discharging to the Y-pipe cleanout of a roof leader. The corrective measures included re-plumbing and sealing the connection annulus, on March 31, 2000, eliminating the space between 1½-inch condensate pipe and the 4-inch cleanout;

- Approximately Column Line R51, a ½-inch pipe entered the 6-inch roof leader pipe at ceiling level, which emanated from a discontinued source. The corrective measures included removing the ½-inch pipe from the roof leader and replacing it with a threaded ½-inch plug on March 31, 2000;

- Approximately Column Line S33, a sprinkler drain discharge demonstrated an open annular space into the receiving stormwater drain. The corrective measure included sealing the connection with Redi Plug on March 31, 2000, eliminating the space between 2-inch sprinkler drain and the 3-inch standpipe drain;

- Approximately Column Line S53, a drain pit containing a 5-inch diameter drainpipe was located, which reportedly discharged to the stormwater system. The corrective measure included filling the 5-inch pipe with Redi Plug on March 31, 2000;

- Approximately Column Line W38, two sumps were identified and found covered with steel plating. The steel plating was welded down; therefore, the sumps were not inspected. As a corrective measure, the outside receiving pipe was later abandoned, mechanically plugged on April 7, 2000, during the southwestern stormwater system replacement;

- Approximately Column Line W43, a floor drain was indicated on the original drawing. The immediate area was visually observed to be covered with concrete, providing a new floor surface and subsequently discontinuing the reported floor drain. During the replacement of the southwestern stormwater system, a 4-inch pipe, believed to be the discharge of the floor drain, was encountered in the northern side of the trench. The corrective measure included filling the 4-inch pipe with Redi Plug on April 14, 2000;

- Approximately Column Line W46, a Y-pipe cleanout of a roof leader was found to open with a broken fitting. The corrective measure included filling the 4-inch fitting with Redi Plug on March 31, 2000;

- Approximately Column Line W48 was the location of the former heat treatment basement. The initial inspection of the heat treatment basement area indicated the presence of residual oil on the floor surface. The area also contained three

decommissioned tanks, which contained some residual oil waste. The corrective measures included scraping and steam pressure washing the tanks and the concrete floor surface (April 4 through April 14, 2000). The wash water generated was collected, tested (see Appendix D, Tank 1), and properly disposed of off site by United Industrial Disposal (see Appendix E);

- Approximately Column Line W49, a basement pump within a sump was located in the former heat treatment basement, which appeared to be rerouted to discharge to the sanitary sewer. The corrective measure included cleaning the sump in conjunction with the basement area. Dye was placed into the sump to confirmed its discharge destination. The dye test confirms that the pump discharges to the sanitary sewer;

- Approximately Column Line X38, an open floor drain was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measures included filling the floor drain with Redi Plug to the interior floor elevation on March 30, 2000. The outside receiving pipe was later abandoned during the southwestern stormwater system replacement;

- Approximately Column Line X38, a standpipe drain was indicated on an original drawing. The immediate area was inspected but positive identification of the standpipe location could not be determined. It appeared to be concrete covered; therefore, assumed plugged As a corrective measure, the outside receiving pipe was later abandoned, mechanically plugged on April 7, 2000, during the southwestern stormwater system replacement;

- Approximately Column Line X39, an open standpipe drain was located where reported. The drain was inspected and determined to not present any environmental concerns. The corrective measures included removal of the standpipe and sealing with Redi Plug on March 30, 2000;

- Approximately Column Line W39, a Y-pipe cleanout of a roof leader was found to be open, without a plug. The corrective measure included installing a 3-inch threaded plug on April 21, 2000;

- Approximately Column Line X40, two sumps were identified in the former rock test room basement, discharging to the stormwater system. The corrective measures included rerouting the pump discharge to the sanitary sewer system and filling one sump with sand and concrete to finish grade on April 3, 2000. The outside receiving pipe was later abandoned during the southwestern stormwater system replacement; and

- Adjacent to Column Line X43, a Y-pipe cleanout of a roof leader was found to be open, without a plug. The corrective measures included installing a 3-inch threaded plug on April 14, 2000. A dye test of the roof leader confirmed that it is routed to the sanitary sewer.

3.4.2 Former Foundry Building

The former foundry building contributed to the southwestern stormwater system (SPDES 001), as indicated on the original construction drawings (see Figures 1 and 3). Generally, contributions were from two sources: the roof leader and the conveyor pit pump. The following are observations and subsequent corrective actions taken:

- Three southern roof leaders and one northern roof leader were identified as contributing sources to SPDES Outfall 001. The corrective measures included abandoning the southern and northern stormwater system associated with the former foundry building on March 29, 2000. The three southern roof leaders were disconnected from the stormwater system and rerouted to discharge to the southern drainage ditch (Area 6) (see Figures 4 and 5). One northern roof leader was disconnected from the stormwater system and rerouted to discharge to the grass area adjacent to the former foundry building loading dock. All roof leaders now contribute to SPDES Outfall 003;

- A former conveyor pit with a basement sump was identified on the original construction drawings as contributing to SPDES Outfall 001. The former conveyor pit/sump was found to be partially filled and inoperative. Later, the downstream end of the pipe was plugged during the stormwater pipe replacement;

- A core oven pit was also inspected. There were no indications of a connection to the stormwater system on the original drawing. The pit was found to be filled and concrete covered to the adjacent floor elevation; and

- During the southwestern stormwater pipe replacement, the leader pipe emanating from the foundry building was disconnected from the system and plugged on April 6, 2000, with an expandable rubber plug; therefore, deemed abandoned.

3.4.3 Former Oil Storage Building

Inspection of the former oil storage building confirmed that inactive and contributing lines have been rerouted and discharge to the sanitary sewer (see Figure 3). This was performed during a previous corrective measure associated with NYSDEC Spill Release No. 9502985, in which a groundwater recovery system was installed, abandoning the connection to the stormwater drain. The groundwater recovery system presently discharges to the sanitary sewer. The roof leaders were rerouted to discharge to the ground surface and, ultimately, to SPDES Outfall 003.

3.4.4 Former Power Plant

The former power plant original construction plans indicate that one interior roof leader and one western stormwater pipe contribute to SPDES Outfall 001 (see Figures 1 and 3). The corrective measures included disconnecting the interior roof leader from the stormwater system and rerouting it to discharge to the southern drainage ditch (Area 6) (see Figures 4 and 5). The roof leader now contributes to SPDES Outfall 003. The western stormwater pipe was disconnected and abandoned during replacement of the southwestern stormwater system.

3.4.5 Former Mechanics Building

The original construction drawing did not provide definitive information that would indicate its stormwater contributions. Inspection of the garage revealed three floor drains, one sump, and an outline of a mechanics pit, as indicated on Figure 3. The pit was filled and capped

with concrete up to the adjacent floor elevation. The floor drains and sump were assumed to contribute to the SPDES Outfall 001; therefore, the following actions were taken:

- The three floor drains were opened for inspection and an effluent pipe was identified. The corrective action involved sealing each effluent pipe with Redi Plug on April 4, 2000; and

- The sump was found partially filled with water but no indication of environmental concern. The sump was not equipped with a pump. The corrective action involved filling the sump with sand fill and placing approximately 4 inches of concrete up to the adjacent floor elevation on April 4, 2000.

3.4.6 Stormwater Pipe Replacement

The stormwater pipe upgrade included the removal of approximately 300 feet of vitrified clay pipe (VC) and replacement with N-12 high-density polyethylene pipe (HDPE) and SDR-35 PVC pipe. A stationing system was employed for the southwestern stormwater piping replacement, as indicated on Figure 5. Pipe replacement construction occurred from April 4, 2000 through May 2, 2000 with subsequent pipe cleaning and surface restoration completed at a later date.

The initial point of replacement of the southwestern stormwater system was adjacent to Column Line X39 (former rock test room basement) at the approximate location of Station No. 3+05. The excavation was advanced in 6-inch to 24-inch cuts, each cut was probed with hand tools (i.e., probing rods, shovels, metal detector, etc.) to verify the location of stormwater pipes and other subsurface utilities. The excavated soils were visually inspected and field screened with a photoionization detector (PID) to assess the presence of volatile organic compounds (VOCs).

The integrity and stability of the stormwater trench sidewalls were maintained through over excavation and the utilization of an Occupational Safety and Health Administration (OSHA) approved trench box. The following describes the step-by-step procedures taken to replace this main collection pipe and the confirmation of the incoming contributing pipe.

1st Upstream Connection Sta. 3+05

A large area was excavated at Station 3+05 to a depth of approximately 5 feet. The purpose of the excavation was to expose the junctions of the Column Line X39 roof leader, the 12-inch collection pipe from the former foundry and oil storage buildings, and a 6-inch pipe emanating from the former power plant.

The 12-inch VC stormwater pipe from the former foundry building and the former oil storage building was sealed upstream, as previously described. The pipe was abandoned by sealing the downstream end with a rubber plug. The initial 20-foot section of 12-inch HDPE stormwater pipe was fitted and sealed on April 7, 2000, to the existing 12-inch VC Y-pipe section. In this manner, the connection would only receive the 6-inch roof drain and constitutes the first upstream station of the new southwestern stormwater system. The second stormwater pipe extending from the former foundry building was located and sealed with Redi Plug.

Junction Box-1, Station 2+29

The 12-inch HDPE pipe replacement proceeded to the west with the second lateral connection located approximately at Column Line X43 (Station 2+29), the location of a building roof leader. At this location, Junction Box-1 (JB-1) was set on April 11, 2000, connecting to the 12-inch HDPE pipe (east/west direction). The 6-inch roof leader from the building had been previously connected to the sanitary sewer. The concrete junction box was mechanically chipped/cut to the proper dimensions in order to accept the respective stormwater piping. The annulus between the sidewalls of the junction box and contribution piping was sealed with Redi Plug to mitigate the potential for leaking of the stormwater system. The top of the junction box was sealed using a thermo set caulk and compressed with a 4-inch thick junction box cover. The junction box and HDPE pipe was backfilled and restored to existing grade with previously excavated backfill. During the pipe replacement, a floor drainpipe from the building was encountered and subsequently sealed with Redi Plug.

Junction Box-2, Station 1+97

The 12-inch HDPE pipe replacement proceeded west to the third connection occurring at approximately Column Line X44 (Station 1+97), the location of the second downstream roof leader from the building. The Junction Box-2 (JB-2) was set on April 17, 2000, connecting

to the upstream 12-inch HDPE (from JB-2) and the 18-inch VC stormwater header from the building. The HDPE pipe diameter changed from 12 inches to 18 inches downstream, to accommodate potential flow from the 18-inch diameter roof leader header during a heavy rain event. The concrete junction box was mechanically chipped/cut to the proper dimension to accept the new stormwater piping. The top of the box, the annulus between the sidewalls of the junction box and contribution piping were sealed according to the methodology previously discussed.

Junction Box-3, Station 1+55

The 18-inch HDPE pipe replacement proceeded west to the fourth lateral connection, which occurs at approximately Column Line X46 (Station 1+55), the location of a stormwater header from the building. Cutting and removal of a section of the concrete parking area was required prior to continued excavation. All soils excavated from the parking area were relocated to a spoil pile directly south of the former power plant.

During trenching activities, impacted soils were encountered (approximately Station 1+90). The soil exhibited some staining, a slight odor, and PID reading above background measurements. The soil was excavated and relocated to a polyethylene-lined staging area for subsequent analytical testing. Approximately 15 cubic yards of impacted soil were excavated. Two verification sidewall samples (DS-1 and DS-2) were collected from the south and north sidewalls of the trench and analyzed for VOCs of concern (see Appendix A). Analytical results indicate that concentrations are below the cleanup levels established by the NYSDEC for the site. The stained soils were then placed in a rolloff, tested (see Appendix B, Waste-1), and disposed of off site (High Acres Landfill) (see Appendix C).

Junction Box-3 (JB-3) was set on April 9, 2000, connecting to the upstream 18-inch HDPE (from JB-2) and connecting the 18-inch VC stormwater header from the building. The concrete junction box was mechanically chipped/cut to the proper dimension to accept the respective stormwater contribution piping. The top of the box, the annulus between the sidewalls of the junction box, and contribution piping was sealed according to the methodology previously discussed. Pre-approved clean backfill material was used as subbase for concrete parking area. Concrete was then poured to restore this area. The spoil pile was later graded, covered with topsoil, and seeded.

Junction Box–4, Station 0+62

The 18-inch HDPE pipe replacement proceeded to the west from JB-3. Concrete and excavated soil removal continued as described previously. The fifth lateral connection occurred at Column Line X51 (Station 0+62), the location of the roof leader from the building. Junction Box-4 (JB- 4) was set on April 6, 2000, connecting to the upstream 18-inch HDPE (from JB-3) and the 6- inch VC roof leader from the building. The concrete junction box was mechanically chipped/cut to the proper dimension to accept the respective stormwater piping. The top of the box, the annulus between the sidewalls of the junction box and contribution piping was sealed according to the methodology previously discussed. Pre-approved clean backfill material was used as subbase for the concrete parking area. Concrete was then poured to restore this area.

A small pocket of stained soil was encountered in the existing pipe backfill material at approximately Station 1+40. A PID was used to detect and define the extent of the stained soils. These soils were segregated, loaded into a rolloff, tested (see Appendix B, Waste-2), and disposed of off site (High Acres Landfill) (see Appendix C).

During continued pipe excavation, stained material was encountered at approximately Station 0+80. This material appeared to be bottom ash, extending approximately 18 inches below the existing concrete. Due to the elevated PID reading, the material was segregated, loaded in a rolloff, tested (see Appendix B, Waste-3), and disposed of off site (High Acres Landfill) (see Appendix C).

18-Inch PVC Slipline

The final 66 feet of the stormwater system was completed using slip-lining technology. An 18-inch diameter PVC pipe was placed inside the existing 24-inch diameter VC pipe from Junction Box-4 to the Alternate SPDES manhole (MH-ST1). This method was utilized to eliminate the need to excavate a concrete walkway west of JB-4, as well as to reduce the possibility of damaging the manhole. The 18-inch PVC sliplining was mechanically pushed through the 24-inch diameter VC pipe, in 15-foot sections. Each section's bell and socket was seated prior to emplacement. The annulus between the 24-inch VC and the 18-PVC was sealed at the manhole and at the upstream interface with Redi Plug on May 2, 2000.

3.4.7 Stormwater System Cleaning

All accessible pipes contributing to the southwestern stormwater system were washed on May 31, 2000 and June 1, 2000. A high-pressure water spray was used to remove any residuals that may have accumulated in the past and during the replacement program. A pneumatic plug was installed at the downstream end of manhole MH-ST1 in the 24-inch VC pipe that discharges to the unnamed creek (Area 1). Wash water was collected in the manhole and periodically transferred to a 1,100-gallon polyethylene tank. A high-pressure, reversed direction, low flow nozzle was placed into the upstream roof leaders, accessed from the roof.

Pressure washing of the stormwater pipe was advanced from roof leaders (approximately Column Lines P27, P33, P36, P40, P43, P47, P51, S37 and X39) (see Figure 5), proceeding from upstream to downstream. The nozzle was advanced downstream until it intersected the HDPE pipe or was stopped at an impasse (i.e., angled fitting, tee). During the cleaning of the roof leader adjacent to Column Line X39, which was done from ground level, the nozzle was extended down the newly installed 12-inch HDPE pipe.

The final phase of the sediment removal/pressure washing included advancing the nozzle upstream of MH-ST1 to clean the newly installed 18-inch PVC and 18-inch HDPE pipe. Wash water and debris was collected in MH-ST1 and transferred to an on-site 1,100-gallon polyethylene tank. Approximately 1,000 gallons of wash water was generated. The wash water was disposed of off site (United Industrial Services).

3.4.8 Manhole Rehabilitation

The Alternate SPDES Outfall 001 is the first upstream manhole (MH-ST1) of the southwestern stormwater system. This manhole received corrective measures to eliminate the potential residue and leakage at the manhole sidewalls. The corrective measures included pressure washing then sealing the manhole sidewalls with Redi Plug from the bottom to the top of the manhole. This also assures sealing of the three influent and one effluent annular connections.

3.5 Current Contributions to Outfall 001

The current sources contribution to SPDES Outfall 001 includes the following (see Figures 4 and 5 and Table 2):

- Stormwater from roof leaders located in the southwestern portion of the former manufacturing facility (Column Line N25 through X53) (see Figure 5);
- Condensate water from air conditioning unit located in the southwestern portion of the former manufacturing building;
- Fire protection sprinkler drains located in the southwestern portion of the former manufacturing building;
- One surface water catch basin located in the south access road; and
- Surface water along the southwestern portion of the site, contributing to the ditches (see Figure 4).

Boiler

3.6 Contingency Action Plan Associated with Outfall 001

The contingency action plan for additional corrective measures/remedies is planned for implementation if analytical results indicate that site-specific parameters exceed final limits set forth in the SPDES permit.

All final permit limit exceedances will be reported to NYSDEC in conjunction with the monthly DMR. SPDES permit Part 1, page 14 – Schedule of Compliance, provides a framework for reporting and corrective action requirements associated with each requirement. The DMR will include the following information associated with each exceedance:

- A short description of the exceedance;
- A description of any actions taken or proposed to comply with the limits without further delay and to limit associated environmental impacts;

- A description of the factors that explain or actions taken to mitigate the exceedance; and
- An estimate of the date of compliance.

In order to provide the above information, the first contingency corrective action includes the following:

Problematic Research

The southwestern stormwater system has many old contributing leader pipes. An initial contingency plan would be considered to identify the leader at which elevated concentrations are detected. The newly installed junction boxes could be reasonably accessed, allowing sampling of individual leaders in an effort to isolate a suspected contributing source. Results of these tests would assist in locating a source and determining subsequent corrective action.

Additionally, a full reconnaissance of all contributing locations within the building and property will be conducted to identify any additional or inappropriate contributions. Results of the reconnaissance will assist in identifying required corrective actions.

Corrective contingency action items could be implemented within 30 days after documentation of an exceedance pending identification of the source, design requirements, required material, and contractor availability.

The following proposed contingency actions would be implemented as determined necessary based on the problematic research conclusions and subject to NYSDEC approval:

Grouting

Should a source be identified in a controllable and accessible location, grouting may be considered. A contingency plan to pressure grout seams and cracks in existing pipe could be performed, followed by residual cleaning.

Roof Leader Rerouting

The roof leader rerouting contingency action plan would include abandonment of some or all subsurface contributing lines (sprinkler, standpipe, floor drains, etc.) associated with SPDES

Outfall 001. The roof leaders and other acceptable contributions would then be rerouted to carrier pipes overhead, through the building exterior wall, and connected to the newly installed junction boxes.

Manhole Replacement

The manhole replacement contingency action plan would include the replacement of the alternate SPDES Outfall 001 manhole (MH-ST1) if it were determined to be source of groundwater intrusion. The existing manhole would be dismantled and disconnected from the southwestern stormwater system. The corrective measures would include installing a new precast concrete manhole, and securing the four existing pipes.

Adjust Sampling Location and Method

The adjustment of the sampling location and method should be considered with regard to their effectiveness and compliance. As a contingency, the SPDES Outfall 001 sampling location will revert to the outfall pipe (original location) and the alternate location within the manhole will be abandoned. Due to the occasional inundation of the outfall pipe, an engineered sampling method would have to be employed. This would involve installing a dedicated 3-inch diameter-sampling pipe up the 24-inch outfall pipe. This would assure that the collected samples are not affected by Area 1 stormwater backing up into the outfall pipe.

4.0 SPDES OUTFALL 002

SPDES Outfall 002 receives the drainage emanating from the northern portion of the property. The northern stormwater system, which is monitored through SPDES Outfall 002, receives water from roof leaders for the northern half of the former manufacturing building. This system also received other contributions, which are reviewed in detail in this section. Historically, the analytical SPDES results have not demonstrated exceedances or reasons for concern.

Even though the SPDES data did not indicate the need, a corrective action was implemented. A review of original historic construction documents and a thorough site reconnaissance was conducted to identify all contributing sources to SPDES Outfall 002. This action plan describes the elimination of inactive and unacceptable contributions. Contingency actions are identified that will be implemented should exceedances occur.

Initially all available existing and historical sources of operational information were reviewed to develop a thorough understanding of known sources of discharge to the outfall. These data were used to support a systematic site reconnaissance, assisted by current facility production personnel where possible, to identify the point of origin of all pipes connected to the stormwater distribution system, to identify and demarcate all pipes allowed to remain, and to remove or permanently close-off all drains and other potential points of contribution that are not known or intended.

4.1 Historic Contributions to Outfall 002

The stormwater contributions associated with SPDES Outfall 002 that predated the implementation of Corrective Actions described in this report included the following (see Figures 1 and 3 and Table 1):

- Stormwater from the roof leaders located in the northern portion of the former manufacturing building (Column Line A through L53) (see Figure 3), two receive boiler drain water.

- Floor drains located in the northern portion of the former manufacturing building (Column Line A through L53), receive boiler drain water.

- Condensate water from an air conditioning unit located in the northern portion of the former manufacturing building.

- Fire protection sprinkler drains located in the northern portion of the former manufacturing building.

- Standpipe drains, which received water from drinking fountains, non-contact cooling water, and heating system water, located in the northern portion of the former manufacturing building.

- The drain pit located in the northwestern portion of the former manufacturing building (Column Line D53).

- One sump located in the former hardening room of the former manufacturing building (Column Line E14).

- One former grinder pit located in the northeastern portion of the former manufacturing building (Column Line C8).

- Two surface water catch basins located in the west access road.

4.2 Historic Data Evaluation of Outfall 002

The permit for SPDES Outfall 002 requires sampling, analytical analysis, and flow analysis to show compliance at the following frequencies:

- Weekly monitoring of Flow;

- Monthly monitoring and analysis for Oil and Grease;

- Bi-monthly monitoring and analysis for Temperature, TSS, and total Phenolics; and

- Semi-annual monitoring and analysis for total Fluoride.

Toxicity Samplings

The SPDES Outfall 002 requires sampling and analytical analysis to show compliance with the NYSDEC Division of Water SPDES permit. Samples are generally collected at Alternate SPDES Outfall 002 (bottom of manhole MH-ST2) prior to entering Area 1 (unnamed creek) (see Figure 1). The historical data related to SPDES Outfall 002 does not present significant upward or downward trend and has remained below the permit compliance limits. A summary for 12 months of DMR analytical results is provided in Table 4. The SPDES Outfall 002 parameters and permit limits are unchanged from the interim to final requirement. Limits are presented in the table below:

Parameter	Permit Limits
Oil & Grease	15 mg/L
TSS (dry)	10 mg/L
TSS (wet)	50 mg/L
Phenol	28 mg/L
Fluoride	2,500 ug/L

Notes:
mg/L = milligrams per liter
ug/L = micrograms per liter

4.3 Historic Remedial Action Associated with Outfall 002

4.3.1 Interim Remedial Measure Associated with Outfall 002

The initial stormwater pipe sediment removal IRM was conducted in 1997 to address the presence of inorganics detected in the sediments of the stormwater drains (outside the building) associated with SPDES Outfall 002. The stormwater drain sediment removal IRM consisted of removing sediments and residuals using high-pressure water sprays within the pipe (approximately 1,000 feet). The wash water was collected from the downstream manhole MH- ST2 and properly disposed of. The IRM was completed with the exception of the section of stormwater drain between SPDES Outfall 002 and the upstream manhole (MH-ST2) (see Figure 2), due to flooding of the unnamed creek.

4.3.2 Remedial Action Associated with Outfall 002

In September of 1998 the IRM associated with SPDES 002 was completed as part of the RA in accordance with the requirements set forth within the remedial design specifications. The storm sewer was cleaned from SPDES Outfall 002 at Area 1 (unnamed creek) upstream to the manhole (MH-ST2), approximately 350 feet. A pipe inspection camera was employed to videotape this section of the pipe. This provided assurance that the stormwater pipe was clean and intact.

4.4 Northern Stormwater System Upgrade Associated with Outfall 002

The objective of the northern stormwater system upgrade was to evaluate/eliminate all unnecessary and inactive sources to the existing stormwater system. Prior to initiating stormwater system upgrade activities a site-specific work plan was developed using information obtained from historical drawing and site reconnaissance. This included review of contributing surface water as well as all buildings and subsequent components.

Acceptable sources to the stormwater drains were limited to roof leaders receiving rain water, sprinkler drains receiving fire protection water during maintenance, boiler water (no additives) drained during maintenance, non-contact cooling water and condensate water from the air conditioning. The RA site-specific HASP was modified to reflect the work tasks associated with the stormwater upgrade plan. Prior to mobilization, all existing site conditions were identified and notification of building owner and tenants was made.

4.4.1 Former Manufacturing Building

As part of the northern stormwater system upgrade, an initial investigation and evaluation of all inactive and contributing sources was conducted within the manufacturing building. All sources associated with the SPDES Outfall 002 from the building are summarized on Table 1 and are located on Figure 3. These present a description of the contributing/inactive sources (i.e., roof leader, sump, drinking fountain, floor drain, sprinkler drain, boiler discharge, non-contact cooling and condensate water). The detailed summary of contribution lines and the corrective measures implemented are as follows:

- Approximately Column Line C35, a sprinkler drain was observed receiving a 2-inch PVC pipe. The pipe was traced and confirmed to not connect to anything. The corrective measures included removal of the PVC pipe and installation of a threaded plug on May 9, 2000.

- Approximately Column Line D8, an operational drinking fountain was located where reported, which discharged to the stormwater drain. The corrective measures included completely disconnecting the drinking fountain drain and installation of a 1½-inch plug on April 5, 2000.

- Approximately Column Line D22, a floor drain and adjacent cleanout was located where reported, which discharged to the stormwater drain. This drain receives boiler water during maintenance of the condensate return pump. The corrective measure included the installation of a standpipe in the floor drain and in the cleanout on April 5, 2000. These pipes were grouted in so as to only receive boiler water. The cleanout received a cap.

- Approximately Column Line D53, a drain pit containing a 5-inch diameter drainpipe was located where reported, which discharged to the stormwater system. The corrective measure included filling the 5-inch pipe with Redi Plug on March 31, 2000.

- Approximately Column Line F7, a Y-pipe cleanout of a roof leader was found to open with a broken fitting. The corrective measure included sealing the fitting with Redi Plug on March 31, 2000.

- Approximately Column Line F12, a Y-pipe cleanout of a roof leader was found to open with a broken fitting. The corrective measure included sealing the fitting with Redi Plug on March 31, 2000.

- Approximately Column Line F27, a 3/4-inch pipe entered the 6-inch roof leader pipe at ceiling level, which emanated from a discontinued source. The corrective measures included removing the 3/4-inch pipe from the roof leader and placing a threaded 3/4-inch plug into the roof leader on May 9, 2000.

- Adjacent to Column Line H3, a Y-pipe cleanout of a roof leader was found to be open, without a plug. The corrective measure included installing a 3-inch threaded plug on March 31, 2000.

- Approximately Column Line H29, an open standpipe (drain) was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug on May 9, 2000.

- Approximately Column Line H32, an open standpipe (drain) was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included installation of a 1-1.5-inch threaded cap on April 5, 2000.

- Approximately Column Line H51, a ½-inch pipe entered the 6-inch roof leader pipe at ceiling level, which emanated from a discontinued source. The corrective measures included removing the ½-inch pipe from the roof leader and replacement with a threaded ½-inch plug on March 31, 2000.

- Approximately Column Line H52, an open floor drain was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on March 31, 2000.

- Approximately Column Line L1, a floor drain and adjacent cleanout was located where reported, which discharged to the stormwater drain. This drain receives boiler water during maintenance of the condensate return pump. The corrective measure included the installation of a standpipe in the flood drain and in the cleanout on May 8, 2000. These pipes were grouted in so as to only receive boiler water. The cleanout received a cap.

- Approximately Column Line L6, an open floor drain was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on March 31, 2000.

- Approximately Column Line L12, an open floor drain was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measures included sealing the floor drain with Redi Plug to the interior floor elevation on April 21, 2000.

- Approximately Column Line L24, a Y-pipe cleanout of a roof leader was found to be open, with a damaged fitting. The corrective measure included sealing the fitting with Redi Plug on April 5, 2000.

- Approximately Column Line L24, an open floor drain was located where reported. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on April 5, 2000.

4.5 Current Contributions to Outfall 002

The current (post-construction) contributions to SPDES Outfall 002 include the following (see Figures 4 and 5 and Table 2):

- Stormwater from roof leaders located in the northern portion of the former manufacturing building (Column Line A through L53).

- Condensate water from air conditioning units located in the northern portion of the former manufacturing building.

- Fire protection sprinkler drains located in the northern portion of the former manufacturing building.

- Standpipe drains receiving non-contact cooling water and boiler maintenance drainage with no additives, such as phosphates, sulfides, descalants, and other chemicals.

- Two surface water catch basins located in the west access road.

4.6 Contingency Action Plan Associated with Outfall 002

The contingency action plan for additional corrective measures/remedies is planned for implementation if analytical results indicate that site-specific parameters exceed final limits set forth in the SPDES permit.

All final permit limit exceedances will be reported to NYSDEC in conjunction with the monthly DMR. SPDES permit Part 1, page 14 – Schedule of Compliance, provides a framework for reporting and corrective action requirements associated with each requirement. The DMR will include the following information associated with each exceedance:

- A short description of the exceedance;
- A description of any actions taken or proposed to comply with the limits without further delay and to limit associated environmental impacts;
- A description of the factors that explain or actions taken to mitigate the exceedance; and
- An estimate of the date of compliance.

In order to provide the above information, the first contingency corrective action includes the following:

Problematic Research

The northern stormwater system has many old contributing leader pipes. An initial contingency plan would be considered to identify the leader at which elevated concentrations are detected. The existing manholes (MH-ST 2, MH-ST 2A, and MH-ST B, see figure 5) could be reasonably accessed, allowing sampling of separate sections of the stormwater system. Results of these tests would assist in locating a source and determining subsequent action.

Should a source be identified in a controllable and accessible location, grouting may be considered, followed by residual cleaning.

Additionally, a full reconnaissance of all contributing locations within the building and property will be conducted to identify any additional or inappropriate contributions. Results of the reconnaissance will assist in identifying required corrective actions.

Corrective contingency action items could be implemented within 30 days after documentation of a exceedance pending identification of the source, design requirements, required material, and contractor availability.

5.0 SPDES OUTFALL 003

SPDES Outfall 003 receives drainage emanating from the southern and eastern portion of the property. Contributions to this outfall included surface runoff from the RAF and surrounding paved areas, roof drainage from peripheral buildings, water collected by the southeastern stormwater system, and post-treated effluent groundwater from the air stripper. These contributions are reviewed in detail in this section.

Corrective actions include a review of original historic construction documents and a thorough site reconnaissance to identify all contributing sources to SPDES Outfall 003. This action plan describes the elimination of inactive and unacceptable contributions, supplement remedial actions, and the upgrade of the SPDES Outfall 003. Contingency actions are identified that will be identified that will be implemented if future exceedances are encountered.

Initially all available existing and historical sources of operational information were reviewed to develop a thorough understanding of known sources of discharge to the outfall. These data were used to support a systematic site reconnaissance, assisted by current facility production personnel where possible, to identify the point of origin of all pipes connected to the stormwater distribution system, to identify and demarcate all ones to be allowed to remain, and to remove or permanently close-off all drains and other potential points of contribution that are not known or intended.

5.1 Historic Contributions to Outfall 003

The stormwater contribution associated with SPDES Outfall 003 that predated the implementation of Corrective Actions described in this report included the following (see Figures 1, 2 and 3 and Table 1):

- Stormwater conveyed from the roof leaders located in the southeastern portion of the former manufacturing facility (Column Line M1 through T24) (see Figure 3);

- Floor drains located in the southeastern portion of the former manufacturing facility (Column Line M1 through T24);

- Fire protection sprinkler drains located in the southeastern portion of the former manufacturing building (Column Line M1 through T24);

- Standpipe drains, which received water from drinking fountains (Column Line M1-T24);

- Condensate water from an air conditioning unit located in the southeastern portion of the former manufacturing building;

- Boiler maintenance drainage route to roof leader adjacent to Column Line P7 (Column Line O10);

- Heater maintenance drainage route to roof leader adjacent to Column Line P3;

- One former crusher pit located in the southeastern portion of the former manufacturing facility (approximately Column Line Q-22);

- Parking lot surface water collected by two pavement grates adjacent to the loading dock located in the south side, mid-portion of the former manufacturing facility. The surface water is conveyed through a 12-inch HDPE pipe that discharges to Area 4 drainage ditch;

- Loading dock drain located off the east side of the east addition to the former manufacturing building. This drain by mean of a four-inch diameter pipe routed directly to the Area 14 ditch;

- The eastern stormwater system, condensate as part of the east addition to the former manufacturing building, drains directly to the area 14 ditch. This services a pit, standpipe drain and drinking fountain;

- Area 4 drainage ditch, which collects surface water runoff from the southeastern portion of the site (downstream of the former chip chute area, Areas 2 and 3) (see Figure 2);

- Area 6 drainage ditch, which collects surface water runoff from the southwestern and southeastern portion of the site (which historically included former separation ponds (Areas 7 and 8), the former 100,000-gallon No. 6 Fuel Oil aboveground storage tank (AST) was also within this drainage area, and former debris landfill (Areas 9 and 10)) (see Figure 2);

- Area 5, the former oil skimmer pond received water/oil which was conveyed via Areas 4 and 6 drainage ditch downstream of chip chute area and the former separation pond, respectively. Prior to IRM/RA measures, the skimmer pond overflow discharged to Area 14, SPDES Outfall 003.

- Stormwater from the Remedial Action Facility (RAF) located in the southeastern portion of the site, which included a containment cell, building, and access roads;

- Treated effluent from the groundwater treatment system directed to Area 14 ditch (see Figure 2). An air stripper is located at Column Line T1 (see Figure 3), which has an independent SPDES Outfall 03A; and

- Area 14 drainage ditch, which collects surface water runoff from the far east parking lot adjacent to the east property line and the east parking lot adjacent to the former manufacturing facility. The Area 14 drainage ditch conveys surface water from Area 4 ditch, Area 6 ditch, stormwater runoff from the RAF, and treated effluent groundwater treatment system (SPDES Outfall 03A). Area 14 flows through SPDES Outfall 003, then off site.

5.2 Historic Data Evaluation of Outfall 003

The current SPDES permit for Outfall 003 requires sampling, analytical analysis and flow measurement to document compliance at the following frequencies:

- Weekly monitoring of Flow and pH;

- Biweekly monitoring and analysis for PCBs (Aroclor 1254);

- Bimonthly monitoring and analysis for Temperature, Oil and Grease, Total Suspended Solids (TSS), Total Phenolics, Total Cadmium, Chlorine, Chloroform, 1,2-Dichloroethylene (1,2-cis- DCE), 1,2-trans-Dichloroethylene (1,2-trans-DCE), Trichloroethylene (TCE), and Vinyl Chloride; and

- Semi-annual monitoring and analysis for Total Lead, Total Selenium and Total Zinc. Recent SPDES Outfall 003 samples were collected from a 12-inch HDPE pipe installed in a concrete head wall, located at the downstream end of Area 14. Prior to December 1999 samples were collected further upstream from a temporary outfall.

Historic review of data from the recent 12 months indicate the following:

- One exceedance of Total Suspended Solids was documented above the interim permit limits;

- Two exceedance of 1,2 trans-DCE were documented above the interim permit limit;

- One exceedance of vinyl chloride was recorded above the interim permit limits.

Table 5 presents DMR data from the previous 12 months of monitoring and analysis related to SPDES Outfall 003.

The SPDES permit discharge limits for TSS, vinyl chloride, and 1,2-trans-DCE have not been detected above the interim permit limits after September 1999. The exceedance above the interim permit discharge limits for TSS, vinyl chloride, and 1,2-trans-DCE occurred prior to the initiation/completion of additional RA associated with Area 14 drainage ditch (completed December 1999; see Section 5.3).

The SPDES exceedance above the interim permit discharge limits for vinyl chloride occurred prior to initiation/completion of additional RA associated with Area 6 seep excavation.

Final permit limits went into effect on May 18, 2000, commencing with data collected in mid June 2000. These data will be reflective of the period of time after the RA and additional corrective actions were completed, as discussed further below. Assessment of compliance with final permit limits will be based on data collected after mid June 2000.

5.2.1 Historic Data Evaluation of Outfall 03A

The effluent from the air stripper, SPDES Outfall 03A, requires sampling, analytical analysis and flow measurement to document compliance with the NYSDEC Division of Water SPDES permit at the following frequencies:

- Continuous monitoring for flow;
- Weekly sampling and analysis for 1,2-cis-DCE, 1,2-trans-DCE, TCE, and vinyl chloride.

Samples are collected at SPDES Outfall 03A from an 8-inch HDPE pipe, located at the upstream end of Area 14. Historic review of data from the previous 12 months indicates no exceedance above the permit limits, as summarized in Table 6.

5.3 Historic Remedial Actions Associated with Outfall 003

5.3.1 Interim Remedial Measure Associated with Outfall 003

Surface Water IRM

A Surface Water IRM associated with SPDES Outfall 003 was completed in the spring of 1995. The Surface Water IRM was implemented to address the discharge of VOCs of concern from the former skimmer pond, Area 5, and an 8-inch clay pipe that discharged to the drainage ditch along Bleecker Street (see Figure 2). The major components of the Surface Water IRM consisted of the following:

- Pumping Manhole No. 1 to collect and transfer water from the former oil skimmer pond;
- Pumping Manhole No. 2 to collect and transfer water from the 12-inch clay pipe, that formerly discharged to the Bleecker Street drainage ditch; and

- Low profile air stripper, that collects and treats water prior to gravity discharge into Area 14 ditch (SPDES Outfall 003).

The IRM was conducted in accordance with the NYSDEC approved work plan. On August 28, 1998 the NYSDEC issued to CPT a modification to the existing SPDES permits; subsequently, a new SPDES permit designated as Outfall 03A was created to monitor the treated water from the air stripper.

Storm Sewer Sediment Removal IRM

The storm sewer pipe sediment removal IRM was conducted in the fall of 1996 and the spring of 1997 to address the presence of inorganics detected in the sediments of the stormwater drains (outside the building) associated with SPDES Outfall 003. The stormwater drain sediment removal IRM consisted of removing sediments and residuals using high-pressure water sprays within the pipe (approximately 400 feet) (see Figure 2). The IRM was conducted in accordance with the NYSDEC approved plan.

5.3.2 Remedial Action Associated with Outfall 003

The site-wide RA was performed between May 1998 and December 1998 under consent order with the NYSDEC and in accordance with the NYSDEC approved Remedial Design Specifications (RDS). The RA included installation of two groundwater collection trenches that were connected to the existing groundwater treatment system, excavation of soil and sediment from 10 identified areas of concern relative to SPDES Outfall 003 (Areas 2, 3, 4, 5, 6, 7, 8, 9, 10, and 14) (see Figure 2). The impacted soils and sediment were excavated and placed in an on-site containment cell or disposed of off site in accordance with the RDS. Specific construction related information is presented in the Remedial Design Specifications, Contract Drawings, Final Engineering Report, As-Built Drawings, and the Operation, Maintenance, and Monitoring Manual, all of which are a part of the RA for the site.

5.3.3 *Supplemental Remedial Actions Associated with Outfall 003*

The supplemental remedial actions (SRAs) were conducted to mitigate suspected or potential source area associated with SPDES Outfall 003. The specific areas of concern that received SRAs were included:

- Decommissioning of former No. 6 fuel oil AST;
- Area 14 - Modification to the drainage ditch; and
- Area 6 - VOC seep and excavation of additional soil/sediment.

Former No. 6 Fuel Oil AST Decommissioning

The former 100,000-gallon No. 6 Fuel Oil AST (see Figure 1) was decommissioned between August 17, 1999 and September 30, 1999. The AST was constructed in 1971, and stored No. 6 fuel oil to power the three boilers housed in the former power plant. The decommissioning activities included the following:

- Installation of eight soil borings along the perimeter of the former AST to investigate the condition of the subsurface soils. There was no evidence of impact to the subsurface soils around the tank.
- Sampling and analytical testing of the tank contents, exterior paint for lead, and exterior insulation for asbestos. Analytical results confirmed No. 6 fuel oil, no lead or asbestos (with exception of just inside the building at the point of severance of the connecting pipe);
- Removal and recycling of approximately 12,000 gallons of No. 6 fuel oil;
- Dismantling, cleaning, and recycling of the AST and containment tank;
- Dismantling, cleaning, and recycling of the pipe connecting the AST to the building;
- Removal of stained soils adjacent to the fill pipe; and

- Restoration of the area to existing grade and re-vegetation.

On December 22, 1999, a final closure report for the former AST was submitted to the NYSDEC Region 6, Petroleum Bulk Storage Program detailing final closure, PBS No. 6-100684.

Area 14 Modifications

The SRA at fabric and riprap material along Area 14 drainage ditch extending the RA riprap to approximately 100 feet of the Bleecker Street drainage ditch. In addition, the temporary SPDES Outfall 003 was moved to a final location at the downstream end of Area 14. The relocated SPDES Outfall 003 incorporated additional engineering design elements to secure the location during storm related precipitation events. The final location of the SPDES Outfall 003 was established to provide a more representative sample point to evaluated surface water quality from the contributing drainage ditches and stormwater piping prior to flowing off site.

Area 6 Seep Excavations

On May 19, 1999, during inspection of the ditches subsequent to a rain event a sheen was observed at the toe of the south bank of the Area 6 ditch. Aqueous samples were taken which had elevated concentrations of VOCs. A seep area was visually identified and on June 10, 1999 approximately 40-cubic yards of stained soil was removed, loaded into a rolloff, and disposed of offsite. Sidewall verification sampling indicated that the cleanup objectives, established by the NYSDEC, were not exceeded at the extents of the excavation. A letter report dated August 2, 1999 was issued to NYSDEC that detailed the remedial action.

On April 21, 2000, during scheduled Operation and Maintenance (O&M) activities at the RAF, a sheen was observed at the toe of the south bank of the Area 6 ditch. In order to delineate and characterize the horizontal and vertical extent of the impacted soil and fill material, four test trenches were excavated. Based on field screening results, the confirmed Area 6 seep was determined to be approximately 75 feet from east to west, 30 feet from north to south and 6 feet in depth, as shown on Figure 2. Verification soil samples were collected from the east and west sidewalls. The analytical results confirm that the concentrations of

target metals, PCBs, and VOCs of concern are below the site-specific cleanup objectives established by the NYSDEC for the site.

Approximately 800 tons of impacted soil were excavated, staged within a polyethylene-lined containment, and tested prior to subsequent disposal in accordance with the RDS. The Area 6 seep excavation was backfilled with approved backfill material and restored to previous grade. Geotextile fabric and riprap were placed in the Area 6 ditch for sediment control. The work was completed on June 7, 2000.

5.4 Southeastern Stormwater System Upgrade Associated with Outfall 003

As part of the southeastern stormwater system upgrade, an initial investigation and evaluation of all inactive and contributing pipe were conducted. The inspected pipes associated with the SPDES Outfall 003 are summarized on Table 1 and located on Figure 3. These present a description of the contributing/inactive sources
(i.e., roof leader, sump, drinking fountain, floor drain, sprinkler drain, boiler discharge, non-contact condensate water). The detailed summary of contribution lines and the corrective measures implemented are as follows:

- Approximately Column Line P-3, an air compressor was located, that discharged condensate through 1-1/2-inch PVC pipe to the Y-pipe cleanout of a roof leader. The corrective measure included disconnecting 1-1/2-inch from the roof leader and sealing the opening with Redi Plug on May 8, 2000.

- Approximately Column Line P-18, a Y-pipe cleanout of a roof leader was found to open, without a plug. The corrective measure included installation of a 1-1/4-inch plug into the Y-pipe on March 31, 2000.

- Approximately Column Line R2, an open floor drain was located where reported on the original drawing. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on March 31, 2000.

- Approximately Column Line R5, an open floor drain was located where reported on the original drawing. The floor drain was inspected and determined to not present any

environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on March 31, 2000.

- Approximately Column Line R9, an open floor drain was located where reported on the original drawing. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on March 31, 2000.

- Approximately Column Line R10, a non-operating drinking fountain drain was located where reported, that discharged to the stormwater system. The corrective measure included sealing the pipe with Redi Plug on March 31, 2000.

- Approximately Column Line R15, an open floor drain was located where reported on the original drawing. The floor drain was inspected and determined to not present any environmental concerns. The corrective measure included sealing the floor drain with Redi Plug to the interior floor elevation on March 31, 2000.

- Approximately Column Line T20, a non-operating drinking fountain drain was located where reported, which discharged to the stormwater system. The corrective measure included installation of a 1-1/2-inch plug on March 31, 2000.

- Adjacent to interior east wall of the former manufacturing building addition, a drinking fountain was found to discharge to a standpipe drain. The corrective measure included completely disconnecting the drinking fountain and installation of a threaded plug on April 5, 2000. This drained into the eastern stormwater system, which empties into Area 14 ditch (see Figure 3).

5.5 Current Contributions to Outfall 003

The current contributions to SPDES Outfall 003 are as follows (see Figures 4 and 5 and Table 2):

- Stormwater, and non-contact water (air conditioning and boiler maintenance drainage), conveyed by roof leaders located in the southeastern portion of the former manufacturing facility (Column Line M1 through T24) (see Figure 5);

- Fire protection sprinkler drains located in the southeastern portion of the former manufacturing building (Column Line M1 through T24);

- Surface water collected by two pavement grates adjacent to the loading dock located at the south side of the former manufacturing facility. The surface water is conveyed through a 12- inch HDPE pipe which discharges to Area 4;

- Loading dock drain located off the east side of the east addition to the former manufacturing building. This drain by means of a four-inch diameter pipe routed directly to the Area 14 ditch;

- Area 4 drainage ditch which collects surface water runoff from the southeastern portion of the site along the former manufacturing building;

- Three southern roof leaders associated with the former foundry building were disconnected from the southwestern stormwater system and rerouted to discharge directly to Area 6 drainage ditch;

- One roof leader associated with the former power plant was disconnected from the southwestern stormwater system and rerouted to discharge to Area 6 drainage ditch;

- Area 6 drainage ditch that collects surface water runoff from the southern portion of the site and stormwater discharge from the former foundry building and the former power plant (see Figure 4);

- Stormwater collected by the RAF stormwater system, located in the southeastern portion of the site;

- Treated effluent from the groundwater treatment system via SPDES Outfall 03A; and

- Area 14 drainage ditch which collects surface water runoff from the far east parking lots adjacent to the east property line and the east parking lot adjacent to the former manufacturing facility. The Area 14 drainage ditch conveys surface water from Area 4 ditch, Area 6 ditch, stormwater runoff from the RAF, and the groundwater treatment system (SPDES Outfall 03A) through SPDES Outfall 003 then off site (see Figure 4).

5.6 Contingency Action Plan Associated with Outfall 003

The contingency action plan for additional corrective measures/remedies is planned for implementation if analytical results indicate that site-specific parameters exceed final limits set forth in the SPDES permit.

All final permit limit exceedances will be reported to NYSDEC in conjunction with the monthly DMR. SPDES permit Part 1, page 14 – Schedule of Compliance, provides a framework for reporting and corrective action requirements associated with each requirement. The DMR will include the following information associated with each exceedance:

- A short description of the exceedance;
- A description of any actions taken or proposed to comply with the limits without further delay and to limit associated environmental impacts;
- A description of the factors that explain or actions taken to mitigate the exceedance; and
- An estimate of the date of compliance.

In order to provide the above information, the first contingency corrective action includes the following:

Problematic Research

Stormwater contributions come from the buildings, production-related loading docks, as well as a large area contributing to site ditches described earlier. Sampling of Area 4 ditch, Area 6 ditch, the southeastern stormwater system would be required, as well as SPDES Outfall 03A. The results of these analytical tests would direct the research and assist in locating the source. The contingency plan would then be designed to address the identified source.

Additionally, a full reconnaissance of all contributing locations within the building and property will be conducted to identify any additional or inappropriate contributions. Results of the reconnaissance will assist in identifying required corrective actions.

Corrective contingency action items could be implemented within 30 days after documentation of a exceedance pending identification of the source, design requirements, required material, and contractor availability.

The following proposed contingency actions will be implemented as determined necessary based on the problematic research conclusions and subject to NYSDEC approval:

Stormwater System

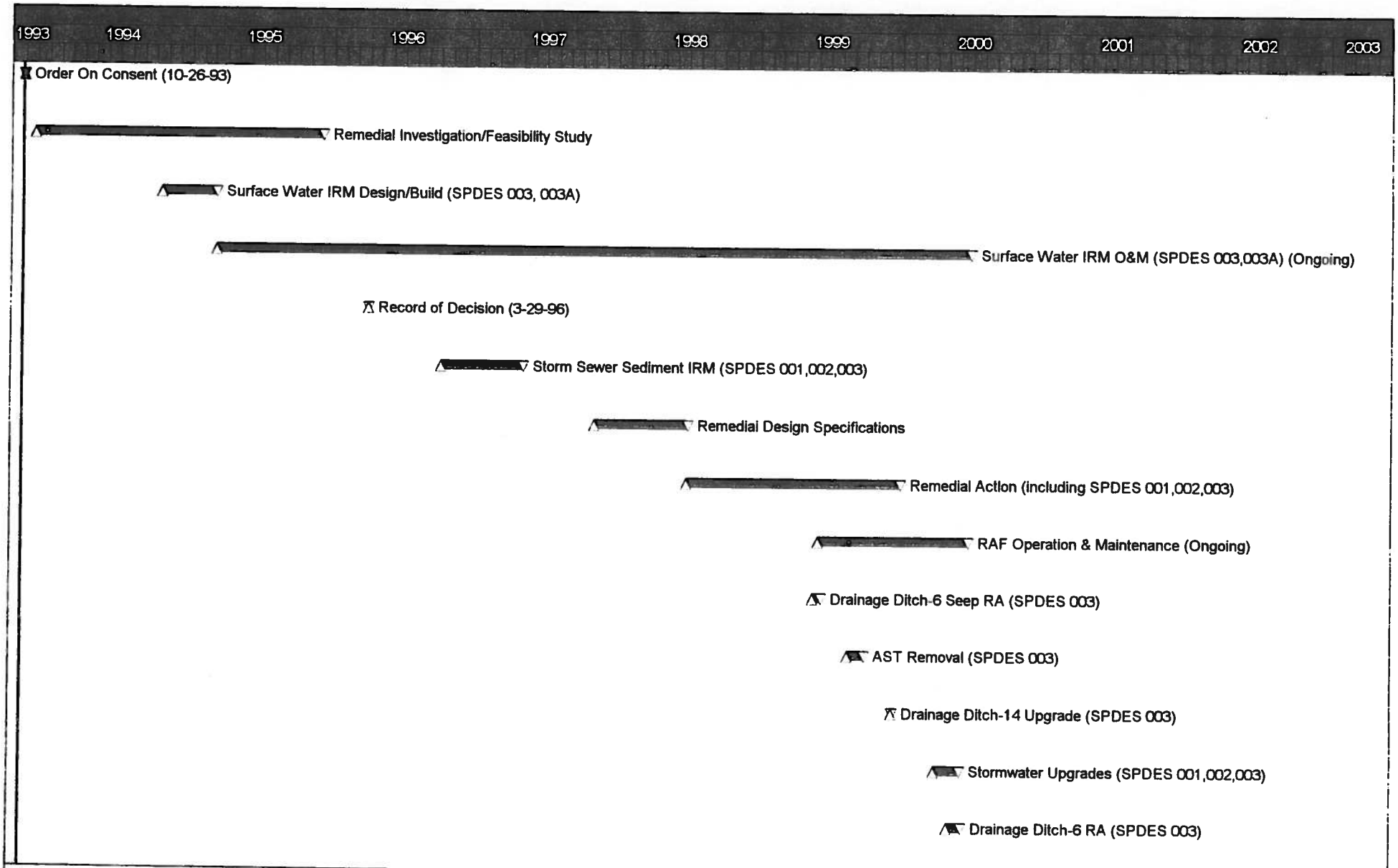
The southeastern and eastern stormwater systems have many old contributing leaders/pipes. An initial contingency plan would include identification and sampling of contributing pipes/leaders. Sampling results would assist in locating and isolating the source and determining subsequent actions, such as pipe cleaning or replacement.

Seep Removal

The entire site would be visually inspected for any unusual discoloring of surface water in from the contributing ditches. Should a seep be noted to produce a sheen, the area would receive further investigation. The contingency plan would include excavation of stained soils and the source of the seep.

6.0 SCHEDULE OF SPDES OUTFALL CORRECTIVE ACTIONS

Remedial action efforts have spanned several years and encompassed an array of activity. The following time line summarizes notable SPDES related actions conducted at the property.



SECOR

Notes:
1985 -1993 - Site Assesment & Characterization

Schedule of SPDES Outfall Corrective Actions
Former Chicago Pneumatic Tool Company
2200 Bleeker St.
Utica, New York

7.0 PROJECT TEAM

Key personnel involved in the SPDES Stormwater Action Plan are identifies on the following table.

PROJECT TEAM
SPDES Stormwater Action Plan
Former Chicago Pneumatic Tool Company
Utica, New York

Name	Address	Phone	Cell	Fax	E-Mail
Chicago Pneumatic					
David L. Rosbrook	Chicago Pneumatic Tool Company 1800 Overview Drive Rock Hill, SC 29730-7463	803.817.7010		803.817.7006	david.rosbrook@atlascopco.com
William M. Thomas, Esq.	Atlas Copco North America Inc. 34 Maple Avenue Pinebrook, NJ 0058	973.439.3431	201.747.2468	973.439.9188	william.thomas@atlascopco.com
Danaher					
Carl Grabinski, Esq.	Danaher Corporation 9200 Fullerton Avenue Franklin Park, IL 60131	773.625.1500 ext. 7404		847.451.0591	
SECOR International					
Vita DeMarchi, P.G.	SECOR International Incorporated 120 E. Washington Street Suite 421 Syracuse, NY 13202	315.475.9204	315.440.0963	315.475.9351	vdemarchi@secor.com
Paul Fisher, P.E.					pfisher@secor.com
Nixon & Peabody					
Jean McCreary, Esq.	Nixon Peabody LLP Clinton Square P.O. Box 31051 Rochester, NY 14603-1051	716.263.1611		716.263.1600	jmccreary@nixonpeabody.com
Richard A. Marx, CPEA, CHMM		716.263.1523		716.263.1600	rmarx@nixonpeabody.com
O'Brien & Gere					
Darrell F. (Rick) O'Shea	O'Brien & Gere ~~Engineers, Inc.~~ of North America 5000 Brittonfield Parkway East Syracuse, NY 13057	315.437.8800		315.463.7440	oshear@obg.com
Adam Turner		315.437.8800 ext. 2693	315.243.8041		turnerab@obg.com
Don Davis		315.437.8800 ext. 2222			davisda@obg.com
Coolidge Utica Properties, LLC					
Jesse Bailey	Coolidge Utica Properties, LLC 123 Court Street Herkimer, NY 13350	315.866.7403		315.866.9655	

8.0 ASSOCIATED DOCUMENTS

The following pages provide a chronological list of associated documents generated in relation to the RA activities conducted at the property.

ASSOCIATED DOCUMENTS
Former Chicago Pneumatic Tool Company
2200 Bleecker Street
Utica, New York

Abbreviation:	Title:	Author:	Date:
Phase 1	Phase I Investigation	NYSDEC	08/85
SI	Site Inspection Report and Hazard Ranking System Model (USEPA)	NUS	09/86
———	Preliminary Site Assessment	BBL	05/88
Order	Administrative Order on Consent Index No. B6-0491-96-04	NYSDEC	10/93
RI	Remedial Investigation Report	BBL	10/94
IRM	Surface Water Interim Remedial Measures (Design)	BBL	10/94
IRM	Surface Water IRM	BBL	03/95
IRM-DWG	IRM Contract Drawing	BBL	04/95
IRM O&M	IRM Operation & Maintenance Manual	BBL	
RI/FS	Health and Safety Plan - Addendum #1 Remedial Investigation/Feasibility Study	BBL	10/95
SRI/FS	Supplemental Remedial Investigation Report/Feasibility Study	BBL	12/95
ROD	Record of Decision - Site No. 622003	NYSDEC	03/96
IRM	Storm Sewer Sediment Removal IRM	BBL	04/97
RD	Remedial Design Work Plan	BBL	11/97
RDS	Remedial Design Specifications	BBL	04/98
———	RDS-Appendix A - Minimum Requirements for Preparation of Plans	BBL	04/98
RDS-FSP	RDS-Appendix B - Remedial Action Field Sampling Plan	BBL	04/98

Abbreviation:	Title:	Author:	Date:
RDS-QAPP	RDS-Appendix C - Remedial Action Quality Assurance Project Plan	BBL	04/98
RDS-MP	RDS-Appendix D - Material and Performance Specification	BBL	04/98
_____	RDS-Appendix E - SVE System Basis of Design	BBL	04/98
_____	RDS-Appendix F - SVE Startup Procedures	BBL	04/98
RDS-AMP	RDS-Appendix G - Site-Specific Air Monitoring Plan	BBL	04/98
RDS CQAP	RDS-Appendix H - Construction Quality Assurance Plan	BBL	04/98
RDS-HASP	RDS Health and Safety Plan for Remedial Action Activities	BBL	06/98
_____	As Built Drawings	*SECOR*	12/99
OMM	Operation, Maintenance, & Monitoring Manual	*SECOR*	12/99
_____	FER-Appendix A - Construction Site Management Plan	*SECOR*	01/00
_____	FER-Appendix B - Site-Specific Health and Safety Plan	*SECOR*	01/00
_____	FER-Appendix C - Contract Submittals	*SECOR*	01/00
_____	FER-Appendix D - Permits and Certificates	*SECOR*	01/00
_____	FER-Appendix E - Analytical Data	*SECOR*	01/00
_____	FER-Appendix F - Data Verification	*SECOR*	01/00
_____	FER-Appendix G - Disposal Manifests and Weight Ship	*SECOR*	01/00
_____	FER-Appendix H - Soil Compaction Data	*SECOR*	01/00
_____	FER-Appendix I - Concrete Test Data	*SECOR*	01/00
_____	FER-Appendix J - Correspondence with NYSDEC	*SECOR*	01/00
_____	FER-Appendix K - Dust Monitoring Data	*SECOR*	01/00
_____	FER-Appendix L - Vapor Monitoring Data	*SECOR*	01/00

TABLE 1

FORMER MANUFACTURING BUILDING - FORMER STORMWATER CONTRIBUTIONS

FORMER CHICAGO PNEUMATIC TOOL COMPANY, UTICA, NEW YORK

Item	Column Line	Description	Comments	Action	SPDES
1	C 4	Sprinkler Drain	OK	None	2
2	C 8	Grinder Pit	OK, Found concrete covered	None	2
3	C 11	Sprinkler Drain	OK	None	2
4	C 15	Roof Leader	OK	None	2
5	C 19	Roof Leader	OK, Receives condensate	None	2
6	C 19	Sprinkler Drain	OK	None	2
7	C 22	Roof Leader	OK, Receives condensate	None	2
8	C 31	Roof Leader	OK	None	2
9	C 35	Roof Leader	OK	None	2
10	C 35	Sprinkler Drain	Removed unnecessary 2" PVC pipe & installed plug	5/9	2
11	C 36	Sprinkler Drain	OK	None	2
12	C 43	Sprinkler Drain	OK	None	2
13	C 49	Roof Leader	OK	None	2
14	C 50	Sprinkler Drain	OK	None	2
15	D 3	Drain (standpipe)	OK, Receives condensate	None	2
16	D 8	Drinking Fountain	Disconnected & installed threaded plug	4/5	2
17	D 22	Drinking Fountain	OK, Found tile covered	None	2
18	D 22	Floor Drain & Cleanout	Receives boiler water, Grout in 4" risers & cap and 6" riser	4/5	2
19	D 50	Drain (standpipe)	Receives heat exchanger water (not running) & cooling water	None	2
20	D 53	Drain Pit	Grout 5" pipe	3/31	2
21	E 14	Harding Room Basement	Acceptable condition, drains to sump (see item # 23)	None	2
22	E 15	Drinking Fountain	OK, Found concrete covered	None	2
23	E 16	Basement Sump	OK, Found plugged and rerouted to sanitary sewer	None	2
24	E 24	Roof Leader	OK	None	2
25	F 3	Roof Leader	OK	None	2
26	F 4	Drinking Fountain	OK, Found disconnected & plugged	None	2
27	F 7	Roof Leader	Grouted "Y" pipe opening	3/31	2
28	F 12	Roof Leader	Grouted "Y" pipe opening	3/31	2
29	F 18	Roof Leader	OK	None	2
30	F 21	Roof Leader	OK	None	2
31	F 27	Roof Leader	Remove 3/4" pipe at ceiling level & plug	5/9	2
32	F 32	Roof Leader	OK	None	2
33	F 36	Roof Leader	OK	None	2
34	F 37	Drinking Fountain	OK, W/vent, Found disconnected & plugged	None	2
35	F 42	Roof Leader	OK	None	2
36	F 47	Roof Leader	OK	None	2
37	F 50	Drinking Fountain	OK, W/vent, Found disconnected & plugged	None	2
38	F 51	Roof Leader	OK	None	2
39	G 25	Drinking Fountain	OK, Found disconnected & plugged	None	2
40	H 1	Drain (standpipe)	OK, Found concrete covered	None	2
41	H 3	Roof Leader	Installed 3" plug	3/31	2
42	H 7	Roof Leader	OK	None	2
43	H 11	Roof Leader	OK	None	2
44	H 15	Drinking Fountain	OK, Found disconnected & plugged	None	2
45	H 15	Roof Leader	OK	None	2
46	H 18	Roof Leader	OK	None	2
47	H 21	Roof Leader	OK	None	2
48	H 27	Roof Leader	OK	None	2
49	H 29	Drain (standpipe)	Grouted	5/9	2
50	H 32	Roof Leader	OK	None	2
51	H 32	Drinking Fountain	Found removed, Installed 1-1/2" cap	4/5	2
52	H 36	Roof Leader	OK	None	2
53	H 40	Roof Leader	OK	None	2
54	H 42	Drinking Fountain	OK, Found disconnected & plugged	None	2

TABLE 1

FORMER MANUFACTURING BUILDING - FORMER STORMWATER CONTRIBUTIONS

FORMER CHICAGO PNEUMATIC TOOL COMPANY, UTICA, NEW YORK

Item	Column Line	Description	Comments	Action	SPDES
55	H 43	Roof Leader	OK	None	2
56	H 47	Roof Leader	OK	None	2
57	H 51	Roof Leader	Plugged 1/2" pipe entering at ceiling level	3/31	2
58	H 52	Floor Drain	Grouted	3/31	2
59	H 53	Sprinkler Drain	OK	None	2
60	L 1	Floor Drain & Cleanout	Receives boiler water, Grout in 4" risers & cap and 6" riser	5/8	2
61	L 6	Floor Drain	Grouted	3/31	2
62	L 12	Floor Drain	Grouted	4/21	2
63	L 19	Floor Drain	OK, Found concrete covered	None	2
64	L 24	Roof Leader	Grouted "Y" pipe opening	4/5	2
65	L 24	Floor Drain	Grouted	4/5	2
66	L 33	Floor Drain	OK, Found concrete covered	None	2
67	L 38	Floor Drain	OK, Mechanically plugged	None	2
68	L 43	Floor Drain	OK, Found concrete covered	None	2
69	N 16	Scale Pit	OK, No drain, Found filled with concrete	None	3
70	N 25	Elevator Pit	OK, No drain	None	1
71	N 42	Drinking Fountain	OK, Found concrete covered	None	1
72	N 43	Floor Drain	OK, Found concrete covered	None	1
73	N 48	Floor Drain	OK, Found concrete covered	None	1
74	O 10	Drain (standpipe)	Newly constructed drain for 2 boilers	None	3
75	O 16	Floor Drain	OK, Found concrete covered	None	3
76	O 25	Degreaser Pit	OK, Found concrete covered	None	1
77	O 46	Floor Drain	OK, Found concrete covered	None	1
78	O 47	Tumble Sumps (2)	OK, Found concrete covered	None	1
79	P 3	Roof Leader	Receives condensate (3/4") from heater, Plug 1-1/2" PVC	5/8	3
80	P 7	Roof Leader	2 1/2" pipe at floor floor routed from boilers @O10	None	3
81	P 11	Roof Leader	OK	None	3
82	P 15	Roof Leader	OK	None	3
83	P 18	Roof Leader	Installed 1-1/4" plug	3/31	3
84	P 22	Roof Leader	OK	None	3
85	P 27	Roof Leader	OK, Has been repaired	None	1
86	P 33	Roof Leader	OK, Has been repaired	None	1
87	P 36	Roof Leader	OK	None	1
88	P 40	Roof Leader	OK	None	1
89	P 43	Roof Leader	OK	None	1
90	P 47	Roof Leader	OK	None	1
91	P 50	Drinking Fountain	Found removed, Installed threaded pipe cap	3/30	1
92	P 51	Roof Leader	OK	None	1
93	Q 22	Crusher Pit	OK, Has been filled with concrete, Presently covered	None	3
94	R 2	Floor Drain	Grouted	3/31	3
95	R 3	Roof Leader	OK	None	3
96	R 5	Floor Drain	Grouted	3/31	3
97	R 7	Roof Leader	OK	None	3
98	R 9	Floor Drain	Grouted	3/31	3
99	R 10	Drinking Fountain	Found removed, Grouted drain pipe	3/31	3
100	R 11	Roof Leader	Has 1/2" condensate pipe	None	3
101	R 15	Roof Leader	OK	None	3
102	R 15	Floor Drain	Grouted	3/31	3
103	R 18	Roof Leader	OK	None	3
104	R 22	Roof Leader	OK, Has been repaired	None	3
105	R 25	Drinking Fountain	Installed threaded pipe plug	3/30	1
106	R 27	Roof Leader	OK, Has been repaired	None	1
107	R 33	Roof Leader	OK	None	1
108	R 36	Roof Leader	OK	None	1
109	R 36	Drain (standpipe)	OK, Found concrete covered	None	1

TABLE 1

FORMER MANUFACTURING BUILDING - FORMER STORMWATER CONTRIBUTIONS

FORMER CHICAGO PNEUMATIC TOOL COMPANY, UTICA, NEW YORK

Item	Column Line	Description	Comments	Action	SPDES
110	R 38	Floor Drain	OK,	None	1
111	R 39	Roof Leader	OK	None	1
112	R 40	Floor Drain	Grouted	4/21	1
113	R 43	Roof Leader	OK	None	1
114	R 43	Drinking Fountain	Found removed, Grouted drain pipe	3/31	1
115	R 47	Roof Leader	1 1/2" PVC AC condensate, Refitted	3/31	1
116	R 51	Roof Leader	Plugged 1/2" pipe entering at ceiling level	3/31	1
117	S 9	Hoist Test Pit	OK, No drain, has been filled with concrete, presently covered	None	3
118	S 33	Sprinkler Drain	Refit & grouted	3/30	1
119	S 38	Sprinkler Drain	OK	None	1
120	S 49	Drinking Fountain	OK, Found concrete covered	None	1
121	S 50	Sprinkler Drain	OK	None	1
122	S 53	Drain Pit	Grout 5" pipe	3/31	1
123	T 4	Sprinkler Drain	OK	None	3
124	T 10	Sprinkler Drain	OK	None	3
125	T 15	Outside Roof Leader	OK	None	3
126	T 16	Sprinkler Drain	OK	None	3
127	T 19	Outside Roof Leader	OK	None	3
128	T 20	Drinking Fountain	Found removed, Installed 1-1/2" plug	3/31	3
129	T 22	Degreaser Pit	OK, No drain, Found filled with concrete	None	3
130	T 23	Outside Roof Leader	OK	None	3
131	T 23	Drain (standpipe)	OK, Found concrete covered	None	3
132	T 23	Sprinkler Drain	OK	None	3
133	T 33	Outside Roof Leader	OK	None	1
134	T 33	Sprinkler Drain	OK	None	1
135	T 37	Outside Roof Leader	OK	None	1
136	T 38	Sprinkler Drain	OK	None	1
137	T 41	Outside Roof Leader	OK	None	1
138	T 44	Sprinkler Drain	OK	None	1
139	U 46	Roof Leader	OK	None	1
140	U 51	Roof Leader	OK	None	1
141	W 38	First floor sumps (2)	Found covered with steel plates and welded, Plugged outside	4/7	1
142	W 43	Floor Drain	Found concrete covered, Grouted outside	4/14	1
143	W 46	Roof Leader	Grouted "Y" pipe opening	3/30	1
144	W 48	Heat Treat Basement	Noted oil residue, steam pressure washed, drains to sump	4/4-4/14	1
145	W 49	Basement Sump	Found rerouted to sanitary sewer, Checked with dye test	4/14	1
146	X 38	Floor Drain	Grouted	3/30	1
147	X 38	Drain (standpipe)	Found concrete covered, Plugged outside	4/7	1
148	X 39	Drain (standpipe)	Removed standpipe and grouted	3/30	1
149	X 39	Roof Leader	Installed 3" plug	4/21	1
150	X 40	Rock Test Rm. Basement	Acceptable condition, drains to sump (see item # 151)	None	1
151	X 40	Basement Sumps (2)	Reroute discharge to sanitary sewer, Fill & concrete 1 sump	4/3	1
152	X 43	Roof Leader	Installed 3" plug, Found rerouted to sanitary sewer, Dye test	4/14	1
153	X 47	Floor Drain	OK, Found concrete covered	None	1
154	X 51	Roof Leader	OK	None	1
155	East Add.	Pit	OK, Found concrete covered	None	3
156	East Add.	Drinking Fountain	Disconnected & installed threaded E33pipe plug	4/5	3
157	East Add.	Drain (standpipe)	OK, capped	None	3

Note: This table is sorted by ascending column lines.

TABLE 2

FORMER MANUFACTURING BUILDING - CURRENT STORMWATER CONTRIBUTIONS

FORMER CHICAGO PNEUMATIC TOOL COMPANY, UTICA, NEW YORK

Item	Column Line	Description	Comments	SPDES
1	P 27	Roof Leader	OK, Has been repaired	1
2	P 33	Roof Leader	OK, Has been repaired	1
3	P 36	Roof Leader	OK	1
4	P 40	Roof Leader	OK	1
5	P 43	Roof Leader	OK	1
6	P 47	Roof Leader	OK	1
7	P 51	Roof Leader	OK	1
8	R 27	Roof Leader	OK, Has been repaired	1
9	R 33	Roof Leader	OK	1
10	R 36	Roof Leader	OK	1
11	R 39	Roof Leader	OK	1
12	R 43	Roof Leader	OK	1
13	R 47	Roof Leader	Receives AC condensate	1
14	R 51	Roof Leader	OK, Has been repaired	1
15	S 33	Sprinkler Drain	OK, Has been repaired	1
16	S 38	Sprinkler Drain	OK	1
17	S 50	Sprinkler Drain	OK	1
18	T 33	Outside Roof Leader	OK	1
19	T 33	Sprinkler Drain	OK	1
20	T 37	Outside Roof Leader	OK	1
21	T 38	Sprinkler Drain	OK	1
22	T 41	Outside Roof Leader	OK	1
23	T 44	Sprinkler Drain	OK	1
24	U 46	Roof Leader	OK	1
25	U 51	Roof Leader	OK	1
26	W 46	Roof Leader	OK, Has been repaired	1
27	X 39	Roof Leader	OK, Has been repaired	1
28	X 43	Roof Leader	OK, Has been repaired	1
29	X 51	Roof Leader	OK	1
30	C 4	Sprinkler Drain	OK	2
31	C 11	Sprinkler Drain	OK	2
32	C 15	Roof Leader	OK	2
33	C 19	Roof Leader	Receives AC condensate	2
34	C 19	Sprinkler Drain	OK	2
35	C 22	Roof Leader	Receives AC condensate	2
36	C 31	Roof Leader	OK	2
37	C 35	Roof Leader	OK	2
38	C 35	Sprinkler Drain	OK, Has been repaired	2
39	C 36	Sprinkler Drain	OK	2
40	C 43	Sprinkler Drain	OK	2
41	C 49	Roof Leader	OK	2
42	C 50	Sprinkler Drain	OK	2
43	D 3	Drain (standpipe)	Receives AC condensate	2
44	D 22	Drain (standpipe)	Receives water from boiler condensate maintenance drain	2
45	D 50	Drain (standpipe)	Receives heat exchanger water & cooling water	2
46	E 24	Roof Leader	OK	2
47	F 3	Roof Leader	OK	2
48	F 7	Roof Leader	OK, Has been repaired	2
49	F 12	Roof Leader	OK, Has been repaired	2
50	F 18	Roof Leader	OK	2
51	F 21	Roof Leader	OK	2
52	F 27	Roof Leader	OK, Has been repaired	2
53	F 32	Roof Leader	OK	2

TABLE 2

FORMER MANUFACTURING BUILDING - CURRENT STORMWATER CONTRIBUTIONS

FORMER CHICAGO PNEUMATIC TOOL COMPANY, UTICA, NEW YORK

Item	Column Line	Description	Comments	SPDES
54	F 36	Roof Leader	OK	2
55	F 42	Roof Leader	OK	2
56	F 47	Roof Leader	OK	2
57	F 51	Roof Leader	OK	2
58	H 3	Roof Leader	OK, Has been repaired	2
59	H 7	Roof Leader	OK	2
60	H 11	Roof Leader	OK	2
61	H 15	Roof Leader	OK	2
62	H 18	Roof Leader	OK	2
63	H 21	Roof Leader	OK	2
64	H 27	Roof Leader	OK	2
65	H 32	Roof Leader	OK	2
66	H 36	Roof Leader	OK	2
67	H 40	Roof Leader	OK	2
68	H 43	Roof Leader	OK	2
69	H 47	Roof Leader	OK	2
70	H 51	Roof Leader	OK, Has been repaired	2
71	H 53	Sprinkler Drain	OK	2
72	L 1	Drain (standpipe)	Receives water from boiler condensate maintenance drain	2
73	L 24	Roof Leader	OK, Has been repaired	2
74	O 10	Drain (standpipe)	Maintenance drain for 2 boilers	3
75	P 3	Roof Leader	Receives condensate from heater	3
76	P 7	Roof Leader	Receives water from boilers @O10	3
77	P 11	Roof Leader	OK	3
78	P 15	Roof Leader	OK	3
79	P 18	Roof Leader	OK, Has been repaired	3
80	P 22	Roof Leader	OK	3
81	R 3	Roof Leader	OK	3
82	R 7	Roof Leader	OK	3
83	R 11	Roof Leader	Receives AC condensate	3
84	R 15	Roof Leader	OK	3
85	R 18	Roof Leader	OK	3
86	R 22	Roof Leader	OK, Has been repaired	3
87	T 4	Sprinkler Drain	OK	3
88	T 10	Sprinkler Drain	OK	3
89	T 15	Outside Roof Leader	OK	3
90	T 16	Sprinkler Drain	OK	3
91	T 19	Outside Roof Leader	OK	3
92	T 23	Outside Roof Leader	OK	3
93	T 23	Sprinkler Drain	OK	3

Note: This table is sorted SPDES Outfalls then by ascending column lines.

Table 3

Summary of Discharge Monitoring Report Data

for SPDES Outfall 001

April 1999 Through April 2000

Parameter	Permit Limits			Monthly DMR Values							
	Frequency	Interim	Final	Units	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99
Oil & Grease	Monthly	15	15	mg/l	<5	<5	<5	<5	<5	<5	<5
Total Suspended Solids (dry)	Bi-monthly	10	10	mg/l	8	4	4	2	2	1	3
Total Suspended Solids (wet)	Bi-monthly	50	50	mg/l	NS	NS	NS	NS	NS	10	NS
Phenolics, Total	Bi-monthly	28	28	ug/l	24	<5	<5	<5	<5	<5	ND
Antimony, Total	Bi-monthly	0.067	0.067	#/d	0.024	<0.024	<0.024	<0.024	<0.024	<0.058	ND
Chromium, Total	Semi-annual	46	51	ug/l	SA	SA	SA	SA	<7	SA	SA
Copper, Total	Bi-monthly	100	100	ug/l	60	50	70	170	100	50	40
Fluoride, Total	Semi-annual	2500	2500	ug/l	SA	SA	SA	SA	<200	SA	SA
Lead, Total	Semi-annual	13	13	ug/l	SA	SA	SA	SA	3	SA	SA
Zinc, Total	Semi-annual	210	210	ug/l	SA	SA	SA	SA	90	SA	SA
Chloroform	Bi-monthly	0.01	0.01	#/d	0.00016	0.0003	0.0009	<0.00016	<0.00016	<0.0001	0.0001
1,2-cis-Dichloroethylene	Bi-monthly	90	10	ug/l	33	53	29	39	<2	9	21
1,2-trans-Dichloroethylene	Bi-monthly	10	10	ug/l	<2	<2	<2	<2	<2	<1	ND
Trichloroethylene (daily ave)	Bi-monthly	0.005	monitor	#/d	0.002	0.0011	0.0017	0.0028	0.0028	0.0005	0.0017
Trichloroethylene (daily max)	Bi-monthly	monitor	10	ug/l	25	28	39	43	56	6	54
Flow	Weekly	monitor	monitor	GPD	9,640	9,640	4,110	9,640	9,640	13,065	6,344

Parameter	Permit Limits			Monthly DMR Values						
	Frequency	Interim	Final	Units	Nov-99	Dec-99	Jan-00	Feb-00	Mar-00	Apr-00
Oil & Grease	Monthly	15	15	mg/l	NS	ND	ND	ND	ND	ND
Total Suspended Solids (dry)	Bi-monthly	10	10	mg/l	6	2	2	1	3	NS
Total Suspended Solids (wet)	Bi-monthly	50	50	mg/l	<1	NS	NS	NS	NS	15
Phenolics, Total	Bi-monthly	28	28	ug/l	17	ND	8	ND	ND	14
Antimony, Total	Bi-monthly	0.067	0.067	#/d	ND	ND	ND	ND	ND	ND
Chromium, Total	Semi-annual	46	51	ug/l	SA	SA	SA	7	SA	SA
Copper, Total	Bi-monthly	100	100	ug/l	ND	30	40	60	30	30
Fluoride, Total	Semi-annual	2500	2500	ug/l	SA	SA	SA	ND	SA	SA
Lead, Total	Semi-annual	13	13	ug/l	SA	SA	SA	3	SA	SA
Zinc, Total	Semi-annual	210	210	ug/l	SA	SA	SA	90	SA	SA
Chloroform	Bi-monthly	0.01	0.01	#/d	0.00004	ND	0.00009	ND	ND	ND
1,2-cis-Dichloroethylene	Bi-monthly	90	10	ug/l	17	77	52	6	110	49
1,2-trans-Dichloroethylene	Bi-monthly	10	10	ug/l	ND	ND	ND	ND	ND	ND
Trichloroethylene (daily ave)	Bi-monthly	0.005	monitor	#/d	0.0006	0.001	0.0004	0.0001	0.0018	0.0034
Trichloroethylene (daily max)	Bi-monthly	monitor	10	ug/l	34	91	34	8	41	26
Flow	Weekly	monitor	monitor	GPD	2,264	4,625	1,475	20,025	5,785	11,340

Notes: See Table-6 for notes.

Table 4

Summary of Discharge Monitoring Report Data

SPDES Outfall 002

April 1999 Through April 2000

Parameter	Permit Limits			Monthly DMR Values							
	Frequency	Interim	Final	Units	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99
Oil & Grease	Monthly	NA	15	mg/l	<5	10	<5	<5	<5	<5	ND
Total Suspended Solids (dry)	Bi-monthly	NA	10	mg/l	8	20	3	3	2	2	2
Total Suspended Solids (wet)	Bi-monthly	NA	50	mg/l	NS	NS	NS	NS	NS	3	NS
Phenolics, Total	Bi-monthly	NA	24	ug/l	19	<5	<5	<5	<5	<5	ND
Fluoride, Total	Bi-monthly	NA	1500	ug/l	SA	SA	SA	SA	1000	SA	SA
Flow	Weekly	monitor	monitor	GPD	970	17,141	6,836	6,960	9,656	11,336	13,274

Parameter	Permit Limits			Monthly DMR Values							
	Frequency	Interim	Final	Units	Nov-99	Dec-99	Jan-00	Feb-00	Mar-00	Apr-00	
Oil & Grease	Monthly	NA	15	mg/l	NS	ND	NS	<5	NS	ND	
Total Suspended Solids (dry)	Bi-monthly	NA	10	mg/l	51	2	NS	2	<1	2	
Total Suspended Solids (wet)	Bi-monthly	NA	50	mg/l	22	NS	NS	NS	NS	NS	
Phenolics, Total	Bi-monthly	NA	24	ug/l	ND	ND	NS	<5	6	24	
Fluoride, Total	Bi-monthly	NA	1500	#/d	SA	SA	SA	1000	SA	SA	
Flow	Weekly	monitor	monitor	GPD	10,228	10,892	13,200	13,267	6,980	16,00	

Notes: See Table-6 for notes

Table 5

Summary of Discharge Monitoring Report Data

for SPDES Outfall 003

April 1999 Through April 2000

Parameter	Permit Limits			Monthly DMR Values							
	Frequency	Interim	Final	Units	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99
Oil & Grease	Monthly	15	15	mg/l	<5	<5	11	<5	<5	<5	ND
Total Suspended Solids (dry)	Bi-monthly	10	10	mg/l	28	14	NS	19	2	NS	2
Total Suspended Solids (wet)	Bi-monthly	50	50	mg/l	NS	NS	11	NS	NS	20	NS
Phenolics, Total	Bi-monthly	44	44	ug/l	7	<5	<5	<5	<5	<5	ND
Cadmium, Total	Bi-monthly	14	14	ug/l	<1	<1	<1	<1	<1	<1	ND
Chlorine, Total	Bi-monthly	750	100	ug/l	90	40	20	40	50	40	50
Lead, Total	Semi-annual	10	10	ug/l	SA	SA	SA	SA	2	SA	SA
Selenium, Total	Semi-annual	15	15	ug/l	SA	SA	SA	SA	1	SA	SA
Zinc, Total	Semi-annual	120	120	ug/l	SA	SA	SA	SA	40	SA	SA
Chloroform	Bi-monthly	0.009	0.009	ug/l	0.00007	<0.00001	<0.00006	<0.00006	<0.00006	<0.0018	ND
1,2-cis-Dichloroethylene	Bi-monthly	0.003	0.0028	#/d	0.0017	<0.00001	<0.00006	0.0002	<0.00006	0.0036	ND
1,2-trans-Dichloroethylene	Bi-monthly	0.0013	0.0013	#/d	0.00007	<0.00001	<0.00006	<0.00006	<0.00006	<0.0018	ND
Trichloroethylene (daily ave)	Bi-monthly	0.003	0.003	#/d	0.0003	<0.00001	<0.00006	0.0009	<0.00003	<0.0009	ND
Trichloroethylene (daily max)	Bi-monthly	monitor	10	#/d	11	<1	<1	15	<1	<1	<1
Vinyl Chloride	Bi-monthly	0.0012	0.0012	ug/l	0.0007	<0.00001	<0.00006	<0.00006	<0.00006	<0.0018	ND
PCB (daily max)	Bi-weekly	1000	monitor	ng/l	<50	<50	270	390	65	330	ND
Aroclor 1254 (daily max)	Bi-weekly	monitor	300	ng/l	NS	NS	NS	NS	NS	NS	NS
Flow	Weekly	monitor	monitor	GPD	14,850	4,148	4,582	4,800	4,680	113,400	4,412

Parameter	Permit Limits			Monthly DMR Values						
	Frequency	Interim	Final	Units	Nov-99	Dec-99	Jan-00	Feb-00	Mar-00	Apr-00
Oil & Grease	Monthly	15	15	mg/l	<5	ND	ND	7	ND	<8
Total Suspended Solids (dry)	Bi-monthly	10	10	mg/l	NS	2	2	ND	1	10
Total Suspended Solids (wet)	Bi-monthly	50	50	mg/l	2	NS	NS	NS	NS	NS
Phenolics, Total	Bi-monthly	44	44	ug/l	ND	ND	ND	ND	ND	ND
Cadmium, Total	Bi-monthly	14	14	ug/l	ND	ND	ND	ND	ND	ND
Chlorine, Total	Bi-monthly	750	100	ug/l	60	80	60	50	60	100
Lead, Total	Semi-annual	10	10	ug/l	SA	SA	SA	2	SA	30
Selenium, Total	Semi-annual	15	15	ug/l	SA	SA	SA	1	SA	SA
Zinc, Total	Semi-annual	120	120	ug/l	SA	SA	SA	40	SA	SA
Chloroform	Bi-monthly	0.009	0.009	ug/l	ND	ND	ND	ND	ND	ND
1,2-cis-Dichloroethylene	Bi-monthly	0.003	0.0028	#/d	0.0002	0.0004	0.0022	0.0002	0.0003	0.0048
1,2-trans-Dichloroethylene	Bi-monthly	0.0013	0.0013	#/d	ND	ND	ND	ND	ND	ND
Trichloroethylene (daily ave)	Bi-monthly	0.003	0.003	#/d	ND	<0.00008	0.003	0.0001	0.0008	0.006
Trichloroethylene (daily max)	Bi-monthly	monitor	10	ug/l	<1	1	55	2	14	ND
Vinyl Chloride	Bi-monthly	0.0012	0.0012	ug/l	ND	ND	ND	ND	ND	ND
PCB (daily max)	Bi-weekly	1000	monitor	ng/l	ND	ND	ND	ND	ND	ND
Aroclor 1254 (daily max)	Bi-weekly	monitor	300	ng/l	NS	NS	NS	NS	NS	NS
Flow	Weekly	monitor	monitor	GPD	4,320	6,255	8,275	222,225	12,180	45,800

Notes: See Table 6 for notes.

Table 6

Summary of Discharge Monitoring Report Data

SPDES Outfall 003A

April 1999 Through April 2000

Parameter	Permit Limits			Monthly DMR Values							
	Frequency	Interim	Final	Units	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99
1,2-cis-Dichloroethylene	Weekly	NA	10	mg/l	<1	<1	<1	<1	<1	<1	ND
1,2-trans-Dichloroethylene	Weekly	NA	10	mg/l	<1	<1	<1	<1	<1	<1	2
Trichloroethylene	Weekly	NA	10	mg/l	<1	<1	<1	<1	<1	2	NS
Vinyl Chloride	Weekly	NA	10	ug/l	<1	<1	<1	<1	<1	<1	ND
Flow	Continuous	monitor	monitor	GPD	4,139	6,617	4,110	5,225	3,807	3,533	6,075

Parameter	Permit Limits			Monthly DMR Values							
	Frequency	Interim	Final	Units	Nov-99	Dec-99	Jan-00	Feb-00	Mar-00	Apr-00	
1,2-cis-Dichloroethylene	Weekly	NA	10	mg/l	ND	ND	ND	ND	ND	ND	
1,2-trans-Dichloroethylene	Weekly	NA	10	mg/l	ND	ND	ND	ND	ND	ND	
Trichloroethylene	Weekly	NA	10	mg/l	1	ND	4	4	2	2	
Vinyl Chloride	Weekly	NA	10	ug/l	ND	ND	ND	ND	ND	ND	
Flow	Continuous	monitor	monitor	GPD	5,120	4,808	6,887	7,846	9,908	8,332	

Notes:

#/d = pounds per day

ug/l = approximately equivalent to parts per billion

mg/l = approximately equivalent to parts per million

Total Suspended Solids (dry) = permit effluent limitations during non-storm related events.

Total Suspended Solids (wet) = permit effluent limitations during storm related events.

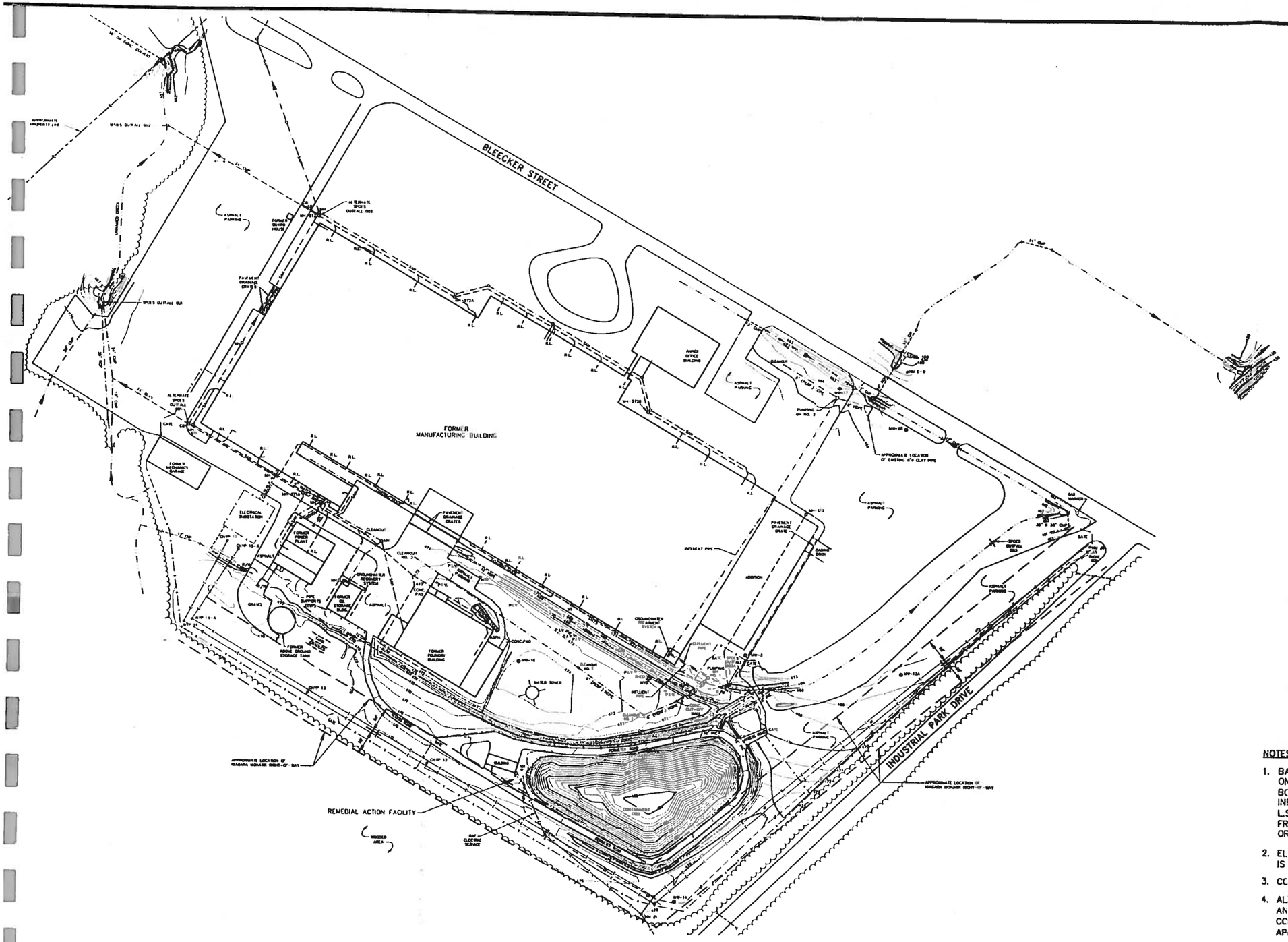
NA = Not Applicable

ND = Not detected above the detection limit.

NS = No sample was taken (either wet of dry flow occurrence).

PCBs = Polychlorinated Biphenyls

The data was provide by O'Brien & Gere



LEGEND

- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- MANHOLE
- CHAIN LINK FENCE
- UTILITY POLE
- RETAINING WALL
- SURFACE DRAINAGE CULVERT
- DRAINAGE DITCH
- DRAINAGE PIPE
- SANITARY SEWER
- STORMWATER DRAIN
- ABANDONED UNDERGROUND PIPE
- TREE LINE
- TELEPHONE (UNDERGROUND)
- MONITORING WELL
- FIRE HYDRANT
- VALVE
- ROOF LEADER DRAIN
- POWER LINE (ABOVE GROUND)
- POWER LINE (UNDERGROUND)

NOTES:

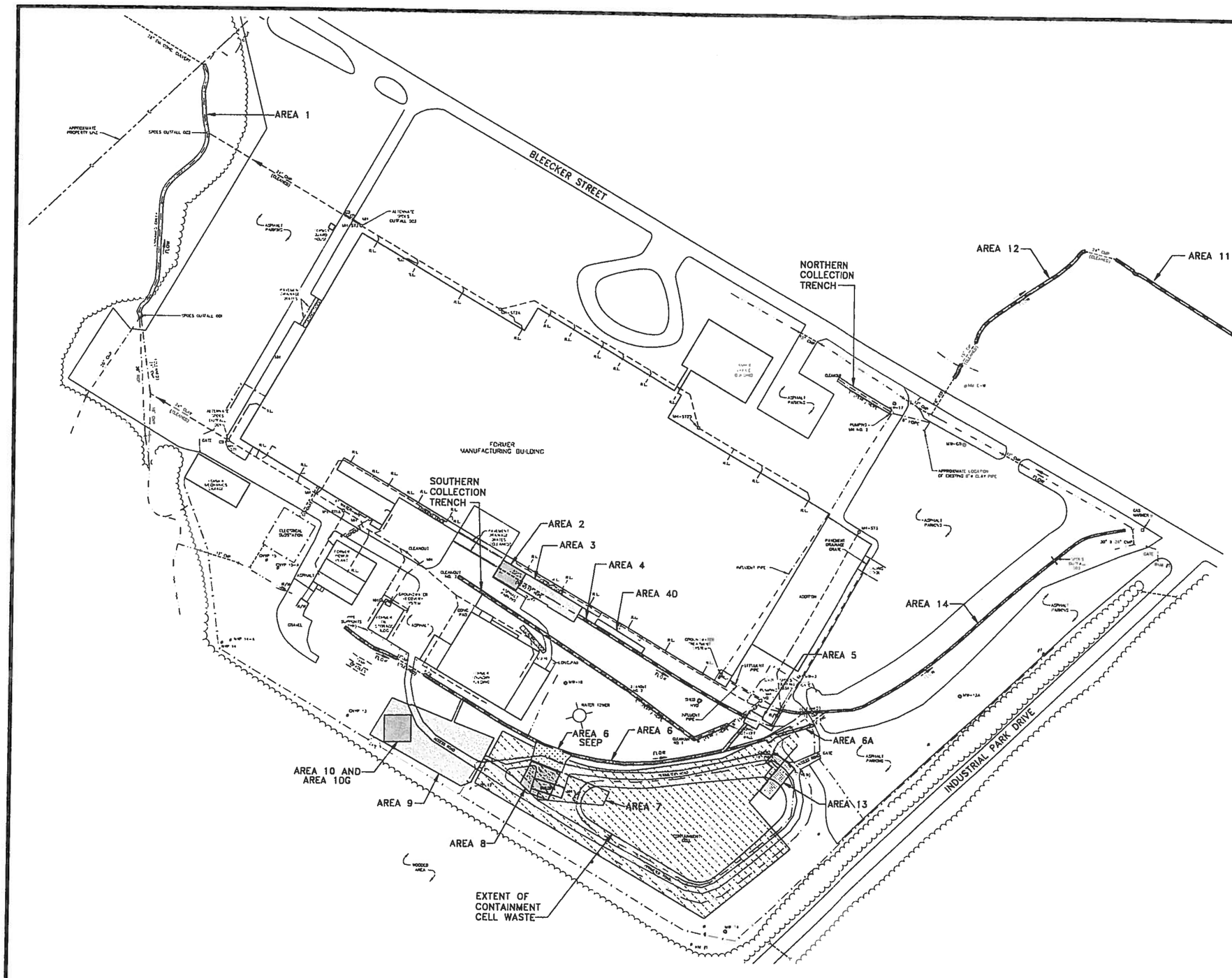
1. BASE MAP INFORMATION SHOWN ON THIS DRAWING IS BASED ON A LIMITED FIELD SURVEY PERFORMED BY BLASLAND, BOUCK & LEE, INC. (BBL), DATED 10/97, AS-BUILT SURVEY INFORMATION PERFORMED BY LAFAVE, WHITE & MCGIVERN, L.S., P.C., DATED 5/99, AND ON INFORMATION OBTAINED FROM PREVIOUS SITE PLANS WHICH MAY BE CONCEPTUAL OR ASSUMED.
2. ELEVATIONS SHOWN ARE IN FEET ABOVE SEA LEVEL (DATUM IS NGVD OF 1988).
3. CONTOUR INTERVAL EQUALS 1 FOOT.
4. ALL ORIGINAL DRAINS AND DRAIN PIPE LOCATIONS INSIDE AND OUTSIDE OF THE BUILDINGS WERE DIGITIZED FROM COPIES OF THE 1948 CONSTRUCTION DRAWINGS AND ARE APPROXIMATE.

0 100' 200' 400'

GRAPHIC SCALE: 1" = 200'

-BASE DWG
SECD2IC
'29/00
COR/CP/CP-07.DWG

SECOR International Incorporated 120 EAST WASHINGTON STREET SYRACUSE, NEW YORK 13202 315-475-9204	SPDES STORMWATER ACTION PLAN FORMER CHICAGO PNEUMATIC TOOL COMPANY UTICA, NEW YORK	FORMER SITE PLAN	PROJECT NO.: 074.40046.009 DATE: JUNE 2000 FIGURE NO.: 1



LEGEND

- MANHOLE
- CHAIN LINK FENCE
- UTILITY POLE
- RETAINING WALL
- DRAINAGE CULVERT
- DRAINAGE DITCH
- DRAINAGE PIPE
- STORMWATER DRAIN
- ABANDONED UNDERGROUND PIPE
- TREE LINE
- MONITORING WELL
- FIRE HYDRANT
- VALVE
- EXCAVATION AREA REQUIRING OFF-SITE DISPOSAL AS A TSCA-REGULATED MATERIAL PCB CONCENTRATION >50 ppm)
- EXCAVATION AREA REQUIRING PLACEMENT INTO THE SVE PORTION OF THE ON-SITE CONTAINMENT CELL (VOC CONCENTRATION >10 ppm, PCBs <50ppm)
- EXCAVATION AREA REQUIRING PLACEMENT INTO THE ON-SITE CONTAINMENT CELL (VOC CONCENTRATION <10 ppm, PCBs <50ppm)
- SELECT WASTE (TOPSOIL)
- EXCAVATION AREA REQUIRING OFF-SITE DISPOSAL (VOC CONCENTRATION >10 ppm)
- CULVERT THAT WAS CLEANED
- NEW CULVERT
- ROOF LEADER DRAIN

NOTES:
1. BASE MAP INFORMATION SHOWN ON THIS DRAWING IS BASED ON A LIMITED FIELD SURVEY PERFORMED BY BLASLAND, BOUCK & LEE, INC. (BBL), DATED 10/97, AS-BUILT SURVEY INFORMATION PERFORMED BY LAFAVE, WHITE & MCGIVERN, L.S., P.C., DATED 5/99, AND ON INFORMATION OBTAINED FROM PREVIOUS SITE PLANS WHICH MAY BE CONCEPTUAL OR ASSUMED.
2. ELEVATIONS SHOWN ARE IN FEET ABOVE SEA LEVEL (DATUM IS NGVD OF 1988).
3. CONTOUR INTERVAL EQUALS 1 FOOT.
4. ALL ORIGINAL DRAINS AND DRAIN PIPE LOCATIONS INSIDE AND OUTSIDE OF THE BUILDINGS WERE DIGITIZED FROM COPIES OF THE 1948 CONSTRUCTION DRAWINGS AND ARE APPROXIMATE.

0 100' 200' 400'

GRAPHIC SCALE: 1" = 200'

X: CP-BASE.DWG
P: [illegible]
6/[illegible]/00
SECOR/CP/CP-98.DWG

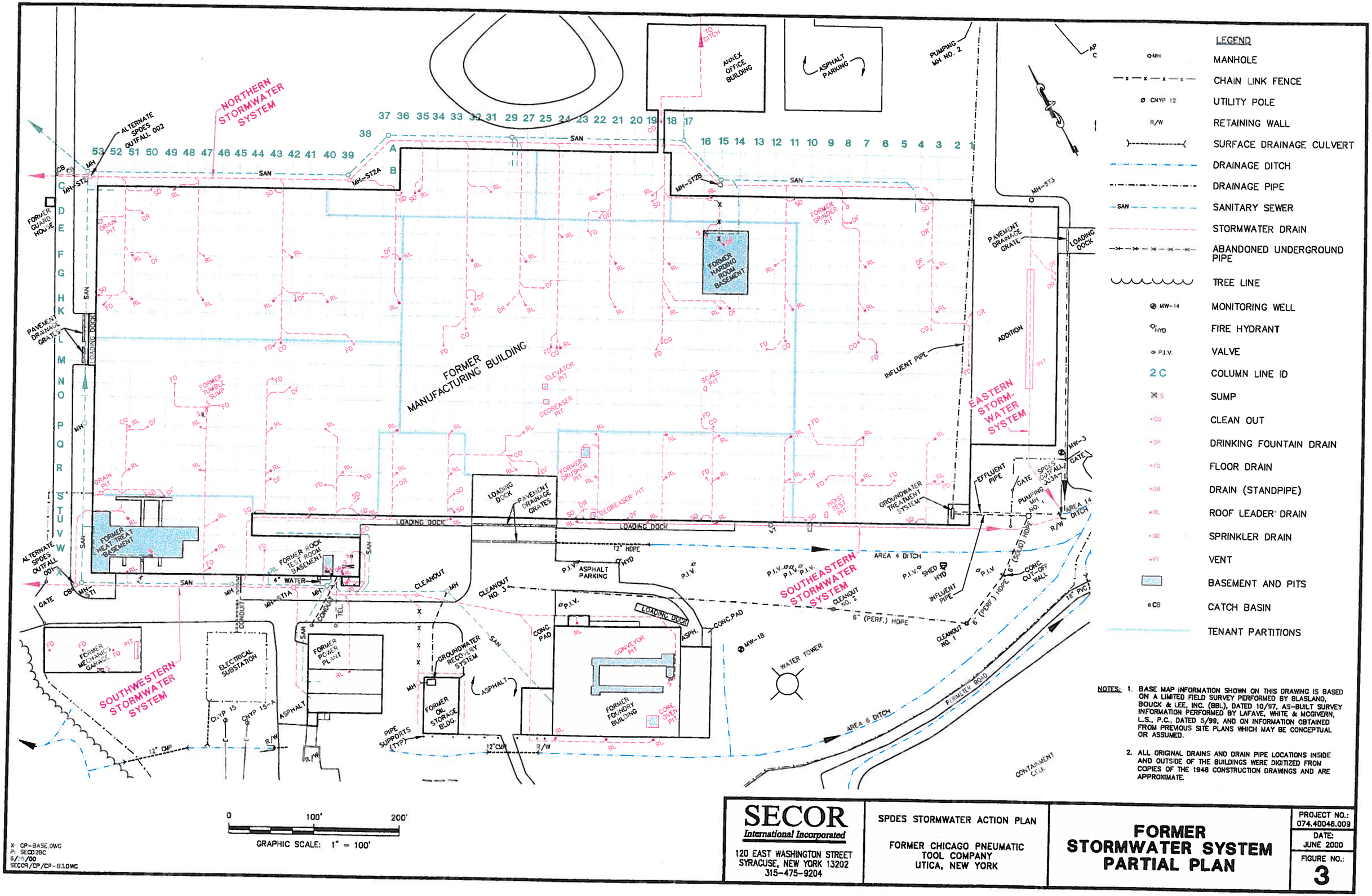
SECOR
International Incorporated
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202
315-475-9204

SPDES STORMWATER ACTION PLAN

FORMER CHICAGO PNEUMATIC TOOL COMPANY
UTICA, NEW YORK

REMEDIAL ACTION AREAS

PROJECT NO.: 074.40046.009
DATE: JUNE 2000
FIGURE NO.: 2



NOTES:

1. BASE MAP INFORMATION SHOWN ON THIS DRAWING IS BASED ON A LIMITED FIELD SURVEY PERFORMED BY BLASLAND, BOUCK & LEE, INC. (BBL), DATED 10/97, AS-BUILT SURVEY INFORMATION PERFORMED BY LAFAVE, WHITE & MCGIVERN, L.S., P.C., DATED 5/99, AND ON INFORMATION OBTAINED FROM PREVIOUS SITE PLANS WHICH MAY BE CONCEPTUAL OR ASSUMED.
2. ALL ORIGINAL DRAINS AND DRAIN PIPE LOCATIONS INSIDE AND OUTSIDE OF THE BUILDINGS WERE DIGITIZED FROM COPIES OF THE 1948 CONSTRUCTION DRAWINGS AND ARE APPROXIMATE.

X: CP-BASE.DWG
P: SECD28C
6/28/00
SECOR/CP/CP-83.DWG

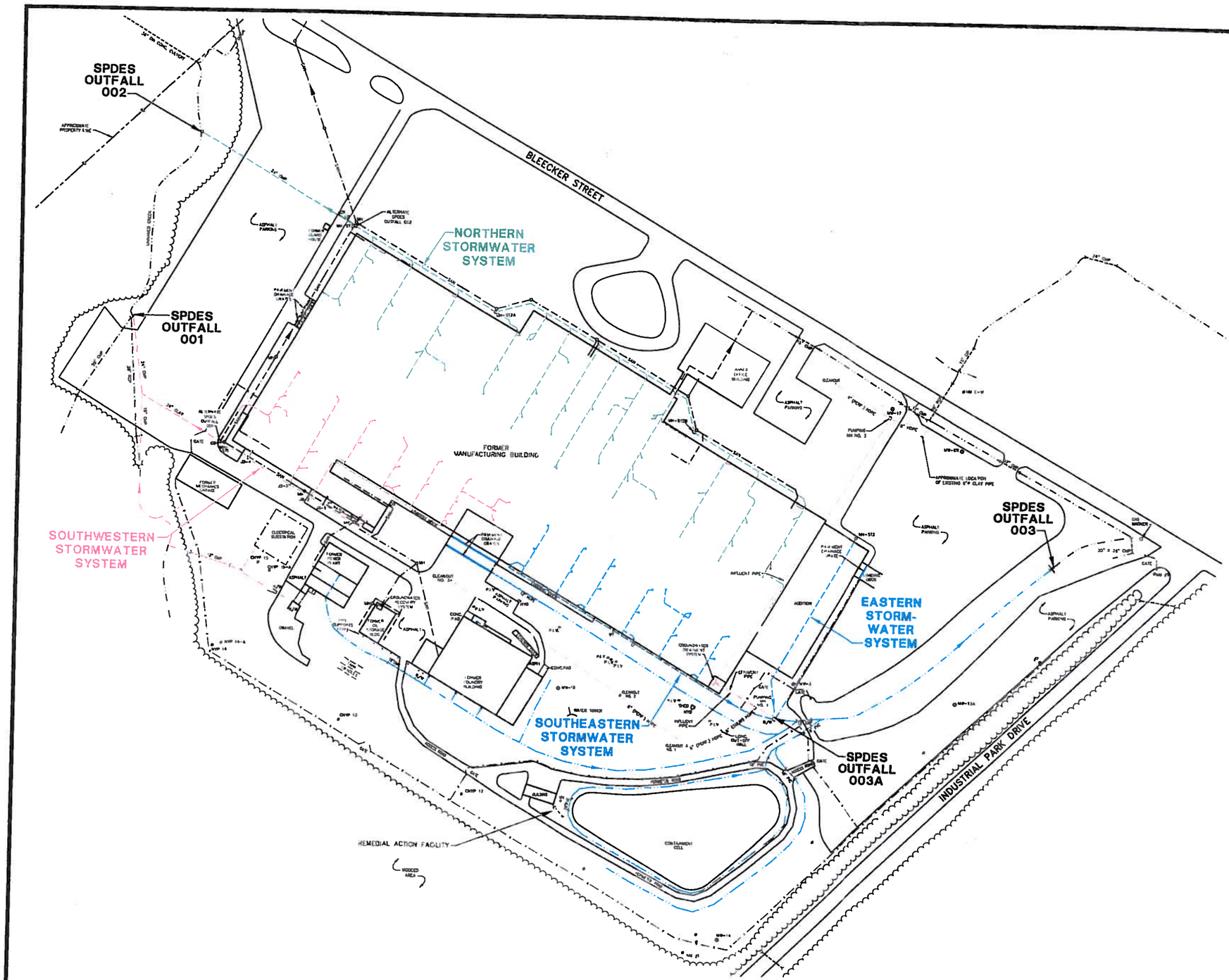
SECOR
International Incorporated
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202
315-475-9204

SPDES STORMWATER ACTION PLAN

FORMER CHICAGO PNEUMATIC TOOL COMPANY
UTICA, NEW YORK

FORMER STORMWATER SYSTEM PARTIAL PLAN

PROJECT NO.: 074.40046.009
DATE: JUNE 2000
FIGURE NO.: 3



LEGEND

- MANHOLE
- CHAIN LINK FENCE
- UTILITY POLE
- RETAINING WALL
- SURFACE DRAINAGE CULVERT
- DRAINAGE DITCH
- DRAINAGE PIPE
- SANITARY SEWER
- STORMWATER DRAIN
- TREE LINE
- MONITORING WELL
- FIRE HYDRANT
- VALVE
- CATCH BASIN
- JUNCTION BOX
- SPDES OUTFALL 001 CONTRIBUTION
- SPDES OUTFALL 002 CONTRIBUTION
- SPDES OUTFALL 003 CONTRIBUTION
- SPDES OUTFALL 003A CONTRIBUTION

NOTES:

1. BASE MAP INFORMATION SHOWN ON THIS DRAWING IS BASED ON A LIMITED FIELD SURVEY PERFORMED BY BLASLAND, BOUCK & LEE, INC. (BBL), DATED 10/97, AS-BUILT SURVEY INFORMATION PERFORMED BY LAFAVE, WHITE & MCGIVERN, L.S., P.C., DATED 5/99, AND ON INFORMATION OBTAINED FROM PREVIOUS SITE PLANS WHICH MAY BE CONCEPTUAL OR ASSUMED.
2. ALL ORIGINAL DRAINS AND DRAIN PIPE LOCATIONS INSIDE AND OUTSIDE OF THE BUILDINGS WERE DIGITIZED FROM COPIES OF THE 1948 CONSTRUCTION DRAWINGS AND ARE APPROXIMATE.

0 100' 200' 400'

GRAPHIC SCALE: 1" = 200'

X: CP-BASE.DWG
P: SECD2BC
6/29/00
SECOR/CP/CP-810.DWG

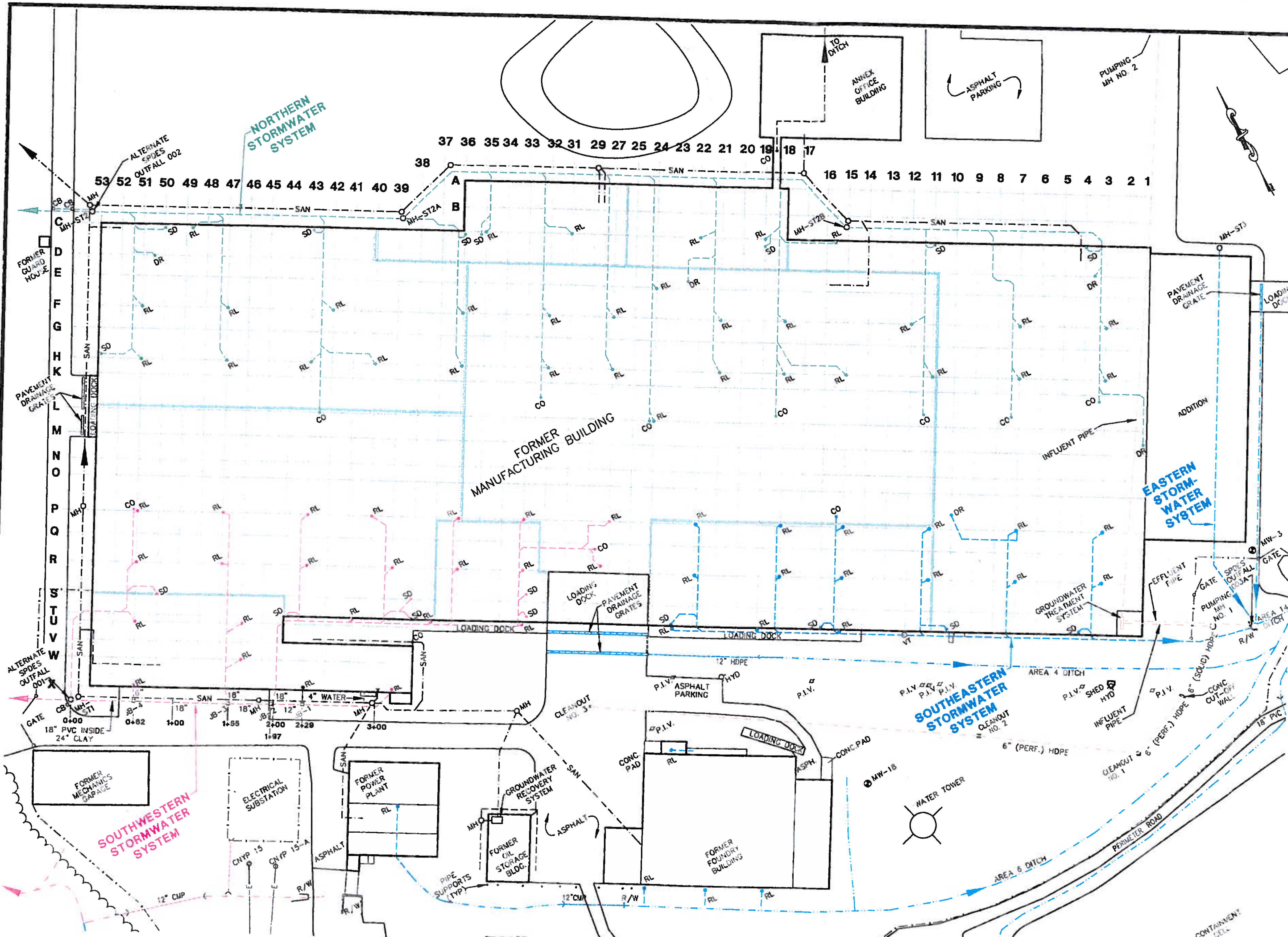
SECOR
International Incorporated
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202
315-475-9204

SPDES STORMWATER ACTION PLAN

FORMER CHICAGO PNEUMATIC TOOL COMPANY
UTICA, NEW YORK

CURRENT STORMWATER SYSTEM PLAN

PROJECT NO.: 074.40046.009
DATE: JUNE 2000
FIGURE NO.: 4



LEGEND

MH	MANHOLE
—x—x—x—	CHAIN LINK FENCE
CNYP 12	UTILITY POLE
R/W	RETAINING WALL
	SURFACE DRAINAGE CULVERT
	DRAINAGE DITCH
	DRAINAGE PIPE
— SAN —	SANITARY SEWER
	STORMWATER DRAIN
	TREE LINE
MW-14	MONITORING WELL
HYD	FIRE HYDRANT
P.I.V.	VALVE
2 C	COLUMN LINE ID
CO	CLEAN OUT
DR	DRAIN (STANDPIPE)
RL	ROOF LEADER DRAIN
SD	SPRINKLER DRAIN
VT	VENT
CB	CATCH BASIN
JB-3	JUNCTION BOX
	TENANT PARTITIONS
0+00	STATION NUMBER
	SPDES OUTFALL 001 CONTRIBUTION
	SPDES OUTFALL 002 CONTRIBUTION
	SPDES OUTFALL 003 CONTRIBUTION
	SPDES OUTFALL 003A CONTRIBUTION

NOTES:

1. BASE MAP INFORMATION SHOWN ON THIS DRAWING IS BASED ON A LIMITED FIELD SURVEY PERFORMED BY BLASLAND, BOUCK & LEE, INC. (BBL), DATED 10/97, AS-BUILT SURVEY INFORMATION PERFORMED BY LAFAVE, WHITE & MCGIVERN, L.S., P.C., DATED 5/99, AND ON INFORMATION OBTAINED FROM PREVIOUS SITE PLANS WHICH MAY BE CONCEPTUAL OR ASSUMED.
2. ALL ORIGINAL DRAINS AND DRAIN PIPE LOCATIONS INSIDE AND OUTSIDE OF THE BUILDINGS WERE DIGITIZED FROM COPIES OF THE 1948 CONSTRUCTION DRAWINGS AND ARE APPROXIMATE.

0 100' 200'
GRAPHIC SCALE

X: CP-BASE.DWG
P: SECO28C
6/29/00
SECCR/CP/CP-89.DWG

SECOR
International Incorporated
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202
315-475-9204

SPDES STORMWATER ACTION PLAN

FORMER CHICAGO PNEUMATIC TOOL COMPANY
UTICA, NEW YORK

CURRENT STORMWATER SYSTEM PARTIAL PLAN

PROJECT NO.: 074.40046.009
DATE: JUNE 2000
FIGURE NO.: 5

This Memorandum is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper No.

MANGIARDI BROS. TRUCKING
960 Pittsfield Road
Castleton, New York 12033
(Name of Carrier)

Carrier No. B 19714

Date 5-25-00

TO: Consignee Hugh Acres Landf.ll	FROM: Shipper Former Chicago Pneumatic Tool Co.
Street 425 Fenton Parkway	Street 2200 Dicker St, Utica NY
Destination Fonfort, NY	Origin AAA Environmental Secur
Route	Emergency Response Phone No. / Vehicle Number

No. Shipping Units	HM*	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (subject to correction)	Rate	CHARGES
1		Roll-off Non-Haz Soil	TOT. EST		
R-001		Fnf prof.# 4961330			

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-126C). Provide emergency response phone number in case of incident or accident in box above.

REMIT C.O.D. TO: ADDRESS:

COD Amt: $

C.O.D. FEE: PREPAID ☐ $ COLLECT ☐

NOTE – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ (Signature of Consignor)

TOTAL CHARGES: $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked
Check box if charges are to be collect ☐

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of this Bill of Lading. This notice supersedes and negates any claimed alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

As Agent for the Generator.

SHIPPER Roger R Creighton Env. mgr.	CARRIER MANGIARDI BROS. TRUCKING
PER 5-25-00	PER Paul Schuetz Waste Management
	DATE 5/25/00

*HAZARDOUS MATERIALS MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIALS AS REFERENCED IN 49CFR § 172.202

This Memorandum is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

MANGIARDI BROS. TRUCKING
1950 Pittsfield Road
Castleton, New York 12033
(Name of Carrier)

Shipper No.
Carrier No. B 19057
Date 5-[illegible]-00

TO: Consignee High Acres Landfill
Street 425 Farnton Parkway
Destination Fair Port, NY
Route

FROM: Shipper Former Chicago Pneumatic Tool Co.
Street 2200 Bleecker St, Utica, NY
Origin AAA Environmental / SECOR
Emergency Response Phone No.
Vehicle Number

No. Shipping Units	HM*	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (subject to correction)	Rate	CHARGES
1		Rolloff Non-Haz Soil	15T. EST		
R-003		Ref Profile # 4961330			

When transporting hazardous materials include the technical or chemical name for n.o.s. (not otherwise specified) or generic description of material with appropriate UN or NA number as defined in US DOT Emergency Communication Standard (HM-126C). Provide emergency response phone number in case of incident or accident in box above.

REMIT C.O.D. TO:
ADDRESS:

COD Amt: $

C.O.D. FEE:
PREPAID ☐ $
COLLECT ☐

TOTAL CHARGES: $

FREIGHT CHARGES:
FREIGHT PREPAID except when box at right is checked
Check box if charges are to be collect ☐

NOTE – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ (Signature of Consignor)

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

NOTICE: Freight moving under this Bill of Lading is subject to the classifications and lawfully filed tariffs in effect on the date of this Bill of Lading. This notice supersedes and negates any claimed, alleged or asserted oral or written contract, promise, representation or understanding between the parties with respect to this freight, except to the extent of any written contract which establishes lawful contract carriage and is signed by authorized representatives of both parties to the contract.

SHIPPER As Agent for the Generator Roger A Crichton Roger Crichton
PER 5-25-00

CARRIER MANGIARDI BROS. TRUCKING
PER Frank Schaffle
DATE 5/25/00 Waste Management 4

*HAZARDOUS MATERIALS MARK WITH "X" TO DESIGNATE HAZARDOUS MATERIALS AS REFERENCED IN 49CFR § 172.202

Confirmation Soil Samples

LSL

RECEIVED 5/5/00

Laboratory Analysis Report

For

Secor International, Inc.

LSL Project Number: 0003288

gale g sutton QAO 5-3-00

Reviewed By **Date**

Life Science Laboratories, Inc.

5854 Butternut Drive, East Syracuse, New York 13057 Telephone: (315) 445-1105 Telefax: (315) 445-1301

NYS DOH ELAP No. 10248

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: WASTE - 1
Project No.:
Source: Chicago Pneumatic
LSL Sample ID: 0003288-001
Sample Matrix: SHW,as Received

Authorization:
LSL Project No.: 0003288
Date Sampled: 4/26/00
Report Date: 5/3/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 9012 Reactive Cyanide				
Cyanide Reactivity	<50	mg/kg	5/2/00	
EPA 9030A Reactive Sulfide				
SW846, 7.3, Sulfide Reactivity	70	mg/kg	5/3/00	
ASTM E-502-84 Ignitability				
Ignitability	>60	degrees C	5/1/00	
EPA 1311 TCLP Extraction				
TCLP Non-Volatile Extraction			4/27/00	
EPA 1311 TCLP Z.H. Extraction				
TCLP Zero Headspace Extraction			4/27/00	
EPA 6010 TCLP Metals				
Arsenic	<1	mg/l	4/29/00	
Barium	<5	mg/l	4/29/00	
Cadmium	<0.5	mg/l	4/29/00	
Chromium	<1	mg/l	4/29/00	
Lead	<1	mg/l	4/29/00	
Selenium	<0.5	mg/l	4/29/00	
Silver	<1	mg/l	4/29/00	
EPA 7471 TCLP Mercury				
Mercury	<0.002	mg/l	5/3/00	
EPA 8082 PCB's				
Aroclor-1016	<0.2	mg/kg	5/2/00	
Aroclor-1221	<0.2	mg/kg	5/2/00	
Aroclor-1232	<0.2	mg/kg	5/2/00	
Aroclor-1242	<0.2	mg/kg	5/2/00	
Aroclor-1248	<0.2	mg/kg	5/2/00	
Aroclor-1254	<0.2	mg/kg	5/2/00	
Aroclor-1260	2.8	mg/kg	5/2/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: WASTE - 1

Project No.:
Source: Chicago Pneumatic
LSL Sample ID: 0003288-001
Sample Matrix: SHW,as Received

Authorization:
LSL Project No.: 0003288
Date Sampled: 4/26/00
Report Date: 5/3/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 8151A TCLP Herbicides				
2,4-D	<0.5	mg/l	5/3/00	
2,4,5-TP (Silvex)	<0.5	mg/l	5/3/00	
EPA 8260 TCLP Volatiles				
Benzene	<0.05	mg/l	5/1/00	
Carbon tetrachloride	<0.05	mg/l	5/1/00	
Chlorobenzene	<0.05	mg/l	5/1/00	
Chloroform	<0.05	mg/l	5/1/00	
1,4-Dichlorobenzene	<0.05	mg/l	5/1/00	
1,2-Dichloroethane	<0.05	mg/l	5/1/00	
1,1-Dichloroethene	<0.05	mg/l	5/1/00	
2-Butanone (MEK)	<0.1	mg/l	5/1/00	
Tetrachloroethene	<0.05	mg/l	5/1/00	
Trichloroethene	<0.67	mg/l	5/1/00	
Vinyl chloride	<0.1	mg/l	5/1/00	
EPA 8270 TCLP Pesticides				
gamma-BHC (Lindane)	<0.01	mg/l	5/1/00	
Chlordane, Total	<0.02	mg/l	5/1/00	
Endrin	<0.01	mg/l	5/1/00	
Heptachlor	<0.005	mg/l	5/1/00	
Heptachlor epoxide	<0.005	mg/l	5/1/00	
Methoxychlor	<0.05	mg/l	5/1/00	
Toxaphene	<0.4	mg/l	5/1/00	
EPA 8270 TCLP Semi-Volatiles				
Cresol, Total	<0.01	mg/l	5/1/00	
2,4-Dinitrotoluene	<0.01	mg/l	5/1/00	
Hexachlorobenzene	<0.01	mg/l	5/1/00	
Hexachlorobutadiene	<0.01	mg/l	5/1/00	
Hexachloroethane	<0.01	mg/l	5/1/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: WASTE - 1

Project No.:
Source: Chicago Pneumatic
LSL Sample ID: 0003288-001
Sample Matrix: SHW,as Received

Authorization:
LSL Project No.: 0003288
Date Sampled: 4/26/00
Report Date: 5/3/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
Nitrobenzene	<0.01	mg/l	5/1/00	
Pentachlorophenol	<0.02	mg/l	5/1/00	
Pyridine	<0.02	mg/l	5/1/00	
2,4,5-Trichlorophenol	<0.01	mg/l	5/1/00	
2,4,6-Trichlorophenol	<0.01	mg/l	5/1/00	
EPA 9045 Water Extractable pH				
pH	8.8	Std. Units	5/1/00	
pH Measurement Temperature	25	°C	5/1/00	
SW846, 7.3 Reactivity Distillation				
Reactivity Distillation			5/1/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: WASTE - 2

Project No.:
Source: Chicago Pneumatic
LSL Sample ID: 0003288-002
Sample Matrix: SHW,as Received

Authorization:
LSL Project No.: 0003288
Date Sampled: 4/26/00
Report Date: 5/3/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 9012 Reactive Cyanide				
Cyanide Reactivity	<50	mg/kg	5/2/00	
EPA 9030A Reactive Sulfide				
SW846, 7.3, Sulfide Reactivity	<50	mg/kg	5/3/00	
ASTM E-502-84 Ignitability				
Ignitability	>60	degrees C	5/1/00	
EPA 1311 TCLP Extraction				
TCLP Non-Volatile Extraction			4/27/00	
EPA 1311 TCLP Z.H. Extraction				
TCLP Zero Headspace Extraction			4/27/00	
EPA 6010 TCLP Metals				
Arsenic	<1	mg/l	4/29/00	
Barium	<5	mg/l	4/29/00	
Cadmium	<0.5	mg/l	4/29/00	
Chromium	<1	mg/l	4/29/00	
Lead	<1	mg/l	4/29/00	
Selenium	<0.5	mg/l	4/29/00	
Silver	<1	mg/l	4/29/00	
EPA 7471 TCLP Mercury				
Mercury	<0.002	mg/l	5/3/00	
EPA 8082 PCB's				
Aroclor-1016	<0.2	mg/kg	5/2/00	
Aroclor-1221	<0.2	mg/kg	5/2/00	
Aroclor-1232	<0.2	mg/kg	5/2/00	
Aroclor-1242	<0.2	mg/kg	5/2/00	
Aroclor-1248	<0.2	mg/kg	5/2/00	
Aroclor-1254	<0.2	mg/kg	5/2/00	
Aroclor-1260	<0.2	mg/kg	5/2/00	

Life Science Laboratories, Inc.
5854 Butternut Drive, East Syracuse, New York 13057 Telephone: (315) 445-1105 Telefax: (315) 445-1301
NYS DOH ELAP No. 10248

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: WASTE - 2
Project No.:
Source: Chicago Pneumatic
LSL Sample ID: 0003288-002
Sample Matrix: SHW,as Received

Authorization:
LSL Project No.: 0003288
Date Sampled: 4/26/00
Report Date: 5/3/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 8151A TCLP Herbicides				
2,4-D	<0.5	mg/l	5/3/00	
2,4,5-TP (Silvex)	<0.5	mg/l	5/3/00	
EPA 8260 TCLP Volatiles				
Benzene	<0.05	mg/l	5/1/00	
Carbon tetrachloride	<0.05	mg/l	5/1/00	
Chlorobenzene	<0.05	mg/l	5/1/00	
Chloroform	<0.05	mg/l	5/1/00	
1,4-Dichlorobenzene	<0.05	mg/l	5/1/00	
1,2-Dichloroethane	<0.05	mg/l	5/1/00	
1,1-Dichloroethene	<0.05	mg/l	5/1/00	
2-Butanone (MEK)	<0.1	mg/l	5/1/00	
Tetrachloroethene	<0.05	mg/l	5/1/00	
Trichloroethene	0.073	mg/l	5/1/00	
Vinyl chloride	<0.1	mg/l	5/1/00	
EPA 8270 TCLP Pesticides				
gamma-BHC (Lindane)	<0.01	mg/l	5/1/00	
Chlordane, Total	<0.02	mg/l	5/1/00	
Endrin	<0.01	mg/l	5/1/00	
Heptachlor	<0.005	mg/l	5/1/00	
Heptachlor epoxide	<0.005	mg/l	5/1/00	
Methoxychlor	<0.05	mg/l	5/1/00	
Toxaphene	<0.4	mg/l	5/1/00	
EPA 8270 TCLP Semi-Volatiles				
Cresol, Total	<0.01	mg/l	5/1/00	
2,4-Dinitrotoluene	<0.01	mg/l	5/1/00	
Hexachlorobenzene	<0.01	mg/l	5/1/00	
Hexachlorobutadiene	<0.01	mg/l	5/1/00	
Hexachloroethane	<0.01	mg/l	5/1/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: WASTE - 2
Project No.:
Source: Chicago Pneumatic
LSL Sample ID: 0003288-002
Sample Matrix: SHW,as Received

Authorization:
LSL Project No.: 0003288
Date Sampled: 4/26/00
Report Date: 5/3/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
Nitrobenzene	<0.01	mg/l	5/1/00	
Pentachlorophenol	<0.02	mg/l	5/1/00	
Pyridine	<0.02	mg/l	5/1/00	
2,4,5-Trichlorophenol	<0.01	mg/l	5/1/00	
2,4,6-Trichlorophenol	<0.01	mg/l	5/1/00	
EPA 9045 Water Extractable pH				
pH	8.4	Std. Units	5/1/00	
pH Measurement Temperature	25	°C	5/1/00	
SW846, 7.3 Reactivity Distillation				
Reactivity Distillation			5/1/00	

Galson Laboratories

6601 Kirkville Road East
E. Syracuse, New York 13057
315 437-7252 • 888-577-5227

Company Name: SECOR

Project Name / Number: Chicago Pneumatic

Turn-Around Time
☐ - Standard Service
☒ - * Rush Service
Date requested by: 5-Day Turn

Ph # ( ) - -

Fax # ( ) - -

Page 1 of 1

Send Report to: Roger Creighton

Send Invoice to:

P.O. #

Chain of Custody Record

Laboratory ID Number: 3288

SAMPLE ID	Date	Time	TYPE: Comp.	Grab	Aqueous	Soil	Other	PARAMETERS FOR ANALYSIS: TCLP VOC	TCLP SVOC	PCB/Pest/Herbicide	RCRA Metals	Ignitability	Reactivity	Paint Filter	pH
Waste-1	4-26-00	12:10	X			X		X	X	X	X	X	X	X	X
Waste-2	4-26-00	12:10	X			X		X	X	X	X	X	X	X	X

REMARKS: * Full TCLP with waste Characteristics per client 4/27 CT

Total Containers - 4

SAMPLER'S NAME: Roger Creighton SIGNATURE:

SAMPLES RELINQUISHED BY:		SAMPLES RECEIVED BY:	
NAME: SIGNATURE:	DATE: 4-26-00 TIME: 17:10	NAME: SIGNATURE:	DATE: TIME:
NAME: SIGNATURE:	DATE: TIME:	Received For Laboratory By: (Signature)	DATE: 4/26/00 TIME: 5:20pm
NAME: SIGNATURE:	DATE: TIME:	Received For Laboratory By: (Signature)	DATE: TIME:

VOC Pres U P AU NA

Custody Seal Intact? ☐ Yes ☐ No ☐ N.A.

Shipment Complete? ☐ Yes ☐ No

Temp _____ ° C TS TB TM

Airbill #

LSL

RECEIVED 5/9/00

Laboratory Analysis Report

For

Secor International, Inc.

LSL Project Number: 0003338

gale g sutton QAO 5-5-00

Reviewed By **Date**

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: Waste-3
Project No.:
Source: Former Chicago Pneumatic
LSL Sample ID: 0003338-001
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0003338
Date Sampled: 4/27/00
Report Date: 5/5/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 9012 Reactive Cyanide				
Cyanide Reactivity	<50	mg/kg	5/2/00	
EPA 9030A Reactive Sulfide				
SW846, 7.3, Sulfide Reactivity	<50	mg/kg	5/3/00	
ASTM E-502-84 Ignitability				
Ignitability	>60	degrees C	5/1/00	
Corrosivity as pH				
Corrosivity as pH	8.4	Std. Units	5/1/00	
EPA 1311 TCLP Extraction				
TCLP Non-Volatile Extraction			5/1/00	
EPA 1311 TCLP Z.H. Extraction				
TCLP Zero Headspace Extraction			5/1/00	
EPA 6010 TCLP Metals				
Arsenic	<1	mg/l	5/3/00	
Barium	<5	mg/l	5/3/00	
Cadmium	<0.5	mg/l	5/3/00	
Chromium	<1	mg/l	5/3/00	
Lead	<1	mg/l	5/3/00	
Selenium	<0.5	mg/l	5/3/00	
Silver	<1	mg/l	5/3/00	
EPA 7471 TCLP Mercury				
Mercury	<0.002	mg/l	5/3/00	
EPA 8082 PCB's				
Aroclor-1016	<0.2	mg/kg	5/2/00	
Aroclor-1221	<0.2	mg/kg	5/2/00	
Aroclor-1232	<0.2	mg/kg	5/2/00	
Aroclor-1242	<0.2	mg/kg	5/2/00	
Aroclor-1248	<0.2	mg/kg	5/2/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: Waste-3
Project No.:
Source: Former Chicago Pneumatic
LSL Sample ID: 0003338-001
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0003338
Date Sampled: 4/27/00
Report Date: 5/5/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
Aroclor-1254	<0.2	mg/kg	5/2/00	
Aroclor-1260	<0.2	mg/kg	5/2/00	
EPA 8151A TCLP Herbicides				
2,4-D	<0.5	mg/l	5/3/00	
2,4,5-TP (Silvex)	<0.5	mg/l	5/3/00	
EPA 8260 TCLP Volatiles				
Benzene	<0.05	mg/l	5/4/00	
Carbon tetrachloride	<0.05	mg/l	5/4/00	
Chlorobenzene	<0.05	mg/l	5/4/00	
Chloroform	<0.05	mg/l	5/4/00	
1,4-Dichlorobenzene	<0.05	mg/l	5/4/00	
1,2-Dichloroethane	<0.05	mg/l	5/4/00	
1,1-Dichloroethene	<0.05	mg/l	5/4/00	
2-Butanone (MEK)	<0.1	mg/l	5/4/00	
Tetrachloroethene	<0.05	mg/l	5/4/00	
Trichloroethene	<0.05	mg/l	5/4/00	
Vinyl chloride	<0.1	mg/l	5/4/00	
EPA 8270 TCLP Pesticides				
gamma-BHC (Lindane)	<0.01	mg/l	5/3/00	
Chlordane, Total	<0.02	mg/l	5/3/00	
Endrin	<0.01	mg/l	5/3/00	
Heptachlor	<0.005	mg/l	5/3/00	
Heptachlor epoxide	<0.005	mg/l	5/3/00	
Methoxychlor	<0.05	mg/l	5/3/00	
Toxaphene	<0.4	mg/l	5/3/00	
EPA 8270 TCLP Semi-Volatiles				
Cresol, Total	<0.01	mg/l	5/3/00	
2,4-Dinitrotoluene	<0.01	mg/l	5/3/00	
Hexachlorobenzene	<0.01	mg/l	5/3/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: Waste-3
Project No.:
Source: Former Chicago Pneumatic
LSL Sample ID: 0003338-001
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0003338
Date Sampled: 4/27/00
Report Date: 5/5/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
Hexachlorobutadiene	<0.01	mg/l	5/3/00	
Hexachloroethane	<0.01	mg/l	5/3/00	
Nitrobenzene	<0.01	mg/l	5/3/00	
Pentachlorophenol	<0.02	mg/l	5/3/00	
Pyridine	<0.02	mg/l	5/3/00	
2,4,5-Trichlorophenol	<0.01	mg/l	5/3/00	
2,4,6-Trichlorophenol	<0.01	mg/l	5/3/00	
SW846, 7.3 Reactivity Distillation				
Reactivity Distillation			5/1/00	

LSL Life Science Laboratories, Inc.
5854 Butternut Drive
East Syracuse, NY 13057
Phone # (315) 445-1105 Telefax # (315) 445-1301

Chain of Custody Record

Client: SECOR Phone # 475-9204
Address: Telefax# 475-9351
cell phone 440-0960

Contact Person:

LSL Project #: 3338
Client's Site I.D.: Former Chicago Pneumatic
Client's Project I.D.:

Turnaround Time (Please circle one): 24 Hr 48 Hr 72 Hr **1 Week** (circled) 2 Weeks 3 Weeks

Authorization:

Client's Sample Identifications	Sample Date	Sample Time	Type grab	Type comp.	Matrix	Preserv. Added	Containers #	Containers size/type	Analyses	Preserv. Check	LSL ID#
Waste-3	4-27-00	10:15		X	S		2		TCLP VOC\SVOC		001
↓	↓	↓		X	S		↓		PCB\Pest\Herb		↓
				X	S				RCRA Metals\Paint Filter		
				X	S				Reactivity\Ignitability		
Waste-3	4-27-00	10:15		X	S		2		pH method?		↓
Tank-1	4-27-00	11:00		X	W		8		608, 624, 625, 1664		002
↓	↓	↓		X	W		↓		TSS\Select** Metals		↓
Tank-1	4-27-00			X	W		8		Ignitability		↓
Trip Blanks *	4-27-00	11:00		X	W		2				003

Notes and Hazard Identifications:
* air bubble in one vial 4/28
** Cd, Cr, Pb, Ni + Zn per R. Creighton 5/2/00

Custody Transfers

			Date	Time
Sampled By: Tyler R Creighton	Received By:			
Relinquished By: [signature]	Received By:		4-28-00	8:25
Relinquished By:	Received for Lab By: [signature]		4/28	0805

Shipment Method: Samples Received Intact: Y N

LSL

RECEIVED 5/24/00

Laboratory Analysis Report

For

Secor International, Inc.

LSL Project Number: 0003650

gale sutton QAO 5-16-00

Reviewed By   Date

Verification Soil Samples

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Paul Fisher
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: DS-2
Project No.:
Source: CP Stormwater O+M
LSL Sample ID: 0002983-002
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0002983
Date Sampled: 4/17/00
Report Date: 4/28/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 8260B TCL Volatiles				
Vinyl chloride	<5	ug/kg	4/25/00	
Trichloroethene	470	ug/kg	4/25/00	
cis-1,2-Dichloroethene	<5	ug/kg	4/25/00	
trans-1,2-Dichloroethene	<5	ug/kg	4/25/00	
Benzene	<5	ug/kg	4/25/00	
Ethyl benzene	<5	ug/kg	4/25/00	
Toluene	<5	ug/kg	4/25/00	
Xylenes (Total)	<5	ug/kg	4/25/00	

Life Science Laboratories, Inc.
5854 Butternut Drive
East Syracuse, NY 13057
Phone # (315) 445-1105 Telefax # (315) 445-1301

Chain of Custody Record

Client: Former Chicago Pneumatic Phone #
Address: SECOR Telefax#

Contact Person: Authorization:

LSL Project #: 3650
Client's Site I.D.:
Client's Project I.D.:

Turnaround Time (Please circle one): 24 Hr 48 Hr 72 Hr (1 Week) 2 Weeks 3 Weeks

Client's Sample Identifications	Sample Date	Sample Time	Type grab	Type comp.	Matrix	Preserv. Added	Containers #	Containers size/type	Analyses	Preserv. Check	LSL ID#
A6-ESW (0-6")	5-8-00	9:00	X	X	S		2		8260 (1,E, DCE, VC) Metals (Pb, Cr, Cu)		001
A6-WSW (0-6")	5-8-00	12:30	X	X	S		2		" "		002

Notes and Hazard Identifications:
8260 (TCE, 1,2 Cis & Trans DCE, VC)
SECOR will call with detection Limits

Custody Transfers		Date	Time
Sampled By: Roger Creighton	Received By:		
Relinquished By:	Received By:	5-9-00	7:55
Relinquished By:	Received for Lab By:	5/9/00	0800

Shipment Method: Samples Received Intact: Y N

LSL

RECEIVED 5/1/00

Laboratory Analysis Report

For

Secor International, Inc.

LSL Project Number: 0002983

gale gsutton QAO 4-28-00

Reviewed By **Date**

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Paul Fisher
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: DS-1
Project No.:
Source: CP Stormwater O+M
LSL Sample ID: 0002983-001
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0002983
Date Sampled: 4/17/00
Report Date: 4/28/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 8260B TCL Volatiles				
Vinyl chloride	<5	ug/kg	4/25/00	
Trichloroethene	180	ug/kg	4/25/00	
cis-1,2-Dichloroethene	19	ug/kg	4/25/00	
trans-1,2-Dichloroethene	<5	ug/kg	4/25/00	
Benzene	<5	ug/kg	4/25/00	
Ethyl benzene	<5	ug/kg	4/25/00	
Toluene	<5	ug/kg	4/25/00	
Xylenes (Total)	<5	ug/kg	4/25/00	

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: A6-WSW (0-6")
Project No.:
Source: Former Chicago Pneumatic
LSL Sample ID: 0003650-002
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0003650
Date Sampled: 5/8/00
Report Date: 5/16/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 6010 Total Metals				
Lead	<10	mg/kg	5/11/00	(6)
Zinc	85	mg/kg	5/11/00	
Chromium	13	mg/kg	5/11/00	
Copper	38	mg/kg	5/11/00	
EPA 8082 PCB's				
Aroclor-1016	<0.02	mg/kg	5/16/00	
Aroclor-1221	<0.02	mg/kg	5/16/00	
Aroclor-1232	<0.02	mg/kg	5/16/00	
Aroclor-1242	<0.02	mg/kg	5/16/00	
Aroclor-1248	<0.02	mg/kg	5/16/00	
Aroclor-1254	<0.02	mg/kg	5/16/00	
Aroclor-1260	<0.02	mg/kg	5/16/00	
EPA 8260B TCL Volatiles				
Trichloroethene	<5	ug/kg	5/10/00	
Vinyl chloride	<5	ug/kg	5/10/00	
cis-1,2-Dichloroethene	<5	ug/kg	5/10/00	
trans-1,2-Dichloroethene	<5	ug/kg	5/10/00	

(6) Elevated detection limit due to matrix interference.

-- LABORATORY ANALYSIS REPORT --

Secor International, Inc.
120 East Washington Street, Suite 421
Syracuse, NY 13202

Attn: Roger Creighton
Phone: (315) 475-9204
FAX: (315) 475-9351

Sample ID: A6-ESW (0-6")
Project No.:
Source: Former Chicago Pneumatic
LSL Sample ID: 0003650-001
Sample Matrix: SHW,as received

Authorization:
LSL Project No.: 0003650
Date Sampled: 5/8/00
Report Date: 5/16/00

Analytical Method / Parameter(s)	Results	Units	Analysis Date	Comment
EPA 6010 Total Metals				
Lead	<10	mg/kg	5/11/00	(6)
Zinc	82	mg/kg	5/11/00	
Chromium	12	mg/kg	5/11/00	
Copper	36	mg/kg	5/11/00	
EPA 8082 PCB's				
Aroclor-1016	<0.02	mg/kg	5/16/00	
Aroclor-1221	<0.02	mg/kg	5/16/00	
Aroclor-1232	<0.02	mg/kg	5/16/00	
Aroclor-1242	<0.02	mg/kg	5/16/00	
Aroclor-1248	<0.02	mg/kg	5/16/00	
Aroclor-1254	0.02	mg/kg	5/16/00	
Aroclor-1260	<0.02	mg/kg	5/16/00	
EPA 8260B TCL Volatiles				
Trichloroethene	<5	ug/kg	5/10/00	
Vinyl chloride	<5	ug/kg	5/10/00	
cis-1,2-Dichloroethene	<5	ug/kg	5/10/00	
trans-1,2-Dichloroethene	<5	ug/kg	5/10/00	

(6) Elevated detection limit due to matrix interference.

LSL
Life Science Laboratories, Inc.
5854 Butternut Drive
East Syracuse, NY 13057
Phone # (315) 445-1105 Telefax # (315) 445-1301

Chain of Custody Record

Client: SECOR Phone # 475-9204
Address: 120 E. WASHINGTON Telefax# 475-9351
SYRACUSE NY 13202
Contact Person: PAUL FISHER Authorization:

LSL Project #: 2983
Client's Site I.D.: CP STORMWATER O+M
Client's Project I.D.:

Turnaround Time (Please circle one): 24 Hr 48 Hr 72 Hr 1 Week 2 Weeks 3 Weeks

Client's Sample Identifications	Sample Date	Sample Time	Type grab	Type comp.	Matrix	Preserv. Added	Containers #	Containers size/type	Analyses	Preserv. Check	LSL ID#
DS-1	4/17/00	1300	X		SOIL	N	1		BTEX 602, 8260 VC, TCE, DCE (TRANS, SIS).		01
DS-2	4/17/00	1300	X		SOIL	N	1		BTEX 602, 8260 VC, TCE DCE (TRANS + SIS)		02

Notes and Hazard Identifications:
DATED SIDEWALL SAMPLES (Paul Fisher not there)
* called Socor + told secretary that 602 method was for WW not soil. She said to change it to soil method BTEX 8260 4/18 0800.

Custody Transfers

		Date	Time
Sampled By:	Received By:		
Relinquished By:	Received By:		
Relinquished By:	Received for Lab By:	4/17/00	1654

Shipment Method: Samples Received Intact: Y N