

ADDITIONS/CHANGES TO REGISTRY: SUMMARY OF APPROVALS

SITE NAME: Rome Landfill Site

DEC I.D. NUMBER 633012

Current Classification 2

Volunteer Yes No
 Sign (7) below

Activity: Add Site Class Reclassify Site Class 4 Delist Site Category Boundary/Name Modification

Approvals:

1. Regional Hazardous Waste Engineer	Yes	<input type="checkbox"/>	ROD RECLASS ↑	No	<input type="checkbox"/>	_____
2. BEEI of NYSDOH	Yes	<input type="checkbox"/>		No	<input type="checkbox"/>	_____
3. DEE	Yes	<input type="checkbox"/>		No	<input type="checkbox"/>	_____
4. _____ Remediation Action Bureau Director [Class 2]	Yes	<input type="checkbox"/>		No	<input type="checkbox"/>	_____
5. BHSC - Investigation Section	Yes	<input type="checkbox"/>		No	<input type="checkbox"/>	_____
6. BHSC - O&M Section [Class 4]	Yes	<input checked="" type="checkbox"/>		No	<input type="checkbox"/>	_____
7. BPM - Brownfield & Voluntary Cleanup Section		<u>n/a</u>			Date _____	
8. Site Control Section		<u>Rod / Manager</u>			Date <u>1/25/99</u>	
9. Director		<u>[Signature]</u>			Date <u>2/1/99</u>	

Completion Checklist for Registry Sites

		Completed By:	
		Initials	Date
OWNER NOTIFICATION LETTER?	<input checked="" type="checkbox"/>	_____	<u>2/23/99</u>
ADJACENT PROPERTY OWNER NOTIFICATION LETTER?	<input checked="" type="checkbox"/>	_____	<u>3/10/99</u>
ENB/LEGAL NOTICE SENT? (For Deletion Only)	<input type="checkbox"/>	_____	_____
COMMENTS SUMMARIZED/PLACE IN REPOSITORY?	<input type="checkbox"/>	_____	_____
FINAL NOTIFICATION SENT TO OWNER? (For Deletion Only)	<input type="checkbox"/>	_____	_____

SITE INVESTIGATION INFORMATION

1. SITE NAME <u>Rome Landfill Site</u>		2. SITE NUMBER <u>6-33-012</u>	3. TOWN/CITY/VILLAGE <u>Rome</u>	4. COUNTY <u>Oneida</u>
5. REGION <u>6</u>	6. CLASSIFICATION <u>CURRENT 2 PROPOSED 4 MODIFY</u>			
7. LOCATION OF SITE (Attach U.S.G.S. Topographic Map showing site location)				
a. Quadrangle: <u>Lee Center, Verona</u>				
b. Site Latitude: <u>43° 14' 23"</u> Site Longitude: <u>75° 32' 19"</u>				
c. Tax Map Numbers: <u>221.00-1-7.1 (Map-Section-Parcel)</u>				
d. Site Street Address: <u>Tannery Road</u>				
8. BRIEFLY DESCRIBE THE SITE (Attach site plan showing disposal/sampling locations)				
The Rome Landfill is an inactive municipal landfill that is located in a wetland. Industrial wastes from various companies in the city are known to have been brought here. Analytical data has confirmed the presence of hazardous waste constituents in both the surface and the groundwater. Previous inspections noted the presence of surface leachate. An EQBA Order for Title 3 funding was signed on February 3, 1992. Under a consent order, the city of Rome agreed to conduct a RI/FS and eventual remediation/proper closure. The RI/FS has been completed and a Record of Decision for the site was signed on March 30, 1995. The Remedial Action has been completed in accordance with the ROD. Construction consisted of consolidation of the waste mass, using Alternative Grading Material (AGM) to increase final grades, installing an engineered cap and leachate collection system in accordance with 6NYCRR Part 360 regulations and the extension of the Rome water line to potentially contaminated homes located near the landfill.				
a. Area: <u>44 acres</u> b. EPA ID Number: <u>NYD980507602</u>				
c. Completed: <input type="checkbox"/> Phase I <input type="checkbox"/> Phase II <input type="checkbox"/> PSA <input type="checkbox"/> RI/FS <input type="checkbox"/> PA/SI <input checked="" type="checkbox"/> Other RA				
9. Hazardous Waste Disposed (Include EPA Hazardous Waste Numbers)				
Solvents and heavy metal wastes				
10. ANALYTICAL DATA AVAILABLE				
a. <input type="checkbox"/> Air <input checked="" type="checkbox"/> Groundwater <input checked="" type="checkbox"/> Surface Water <input checked="" type="checkbox"/> Sediment <input checked="" type="checkbox"/> Soil <input type="checkbox"/> Waste <input type="checkbox"/> Leachate <input type="checkbox"/> EPTox <input type="checkbox"/> TCLP				
b. Contravention of Standards or Guidance Values				
The RI/FS identified various VOCs & SVOCs, iron, manganese, barium, boron and sodium as chemicals of concern in groundwater for the site. Surface water, sediment and leachate samples collected contained elevated levels of VOCs, SVOCs and metals as well. Since no waste was removed from the soil, we assume that hazardous waste still remains in the waste mass.				
11. CONCLUSION				
The selected remedy has been completed in accordance with the ROD and the approved design. A final inspection was held and the Engineers certification is included in the attached Remedial Action Report. A long term O&M plan has been approved by the NYSDEC. Thus, reclassification to class 4 is justified.				
NOTE: Deed restrictions, as required by the ROD, were not placed on this property since the site will remain on the registry as a class 4 site and continue to be subject to part 375 regulations.				
12. SITE IMPACT DATA				
a. Nearest Surface Water: Distance <u>100</u> ft.		Direction: <u>North, West & South</u>		Classification: <u>Wetlands</u>
b. Nearest Groundwater: Depth <u>15</u> ft.		Flow Direction: <u>East</u>		<input type="checkbox"/> Sole Source <input type="checkbox"/> Primary <input type="checkbox"/> Principal
c. Nearest Water Supply: Distance <u>NA</u> ft.		Direction: <u>NA</u>		Active: <input type="checkbox"/> Yes <input type="checkbox"/> No
d. Nearest Building: Distance <u>100</u> ft.		Direction: <u>West</u>		Use: <u>Residence</u>
e. In State Economic Development Zone?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	i. Controlled Site Access? <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
f. Crops or livestock on site?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	j. Exposed hazardous waste? <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
g. Documented fish or wildlife mortality?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	k. HRS Score: <u>NA</u>	
h. Impact on special status fish or wildlife resource?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	l. For Class 2: Priority Category <u>NA</u>	
13. SITE OWNER'S NAME		14. ADDRESS		15. TELEPHONE NUMBER
City of Rome		City Hall, Rome, New York, 13440		(315) 339-7625
16. PREPARER		17. APPROVED		
<u>Craig M. Lapinski</u>		<u>Earl H. Barcomb</u>		
Signature		Signature		
Date		Date		
<u>1/7/99</u>		<u>2/1/99</u>		
Craig M. Lapinski, Environmental Engineer 2, BCS - DER		Earl H. Barcomb, Director, BHSC, DER		
Name, Title, Organization		Name, Title, Organization		

~ original ~

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 Division of Hazardous Waste Remediation
Inactive Hazardous Waste Disposal Report

Site Name: Rome Landfill	Site Code: 633012
Class Code: 4 Region: 6 County: Oneida	EPA Id: NYD980507602
Address: Tannery Road City: Rome	Zip: 13440
Latitude: 43 14' 23" Longitude: 75 32' 19"	
Site Type: Landfill	Estimated Size: 44 Acres

Site Owner / Operator Information:			
Current Owner(s) Name: City of Rome			
Current Owner(s) Address: City Hall	Rome		NY 13440
Owner(s) during disposal: City of Rome			
Operator(s) during disposal: City of Rome, Dept. of Public Works			
Stated Operator(s) Address: City Hall	Rome		NY 13440
Hazardous Waste Disposal Period: From Unknown	To Dec. 1985		

Site Description:

The Rome landfill is an inactive municipal landfill that is located in a wetland. Industrial wastes from various companies in the city are known to have been brought here. Analytical data has confirmed the presence of hazardous waste constituents in both the surface and groundwater. Previous inspections have noted the presence of surface leachate. An EPA Site Investigation has been completed for this site. The DOH has sampled residential drinking water wells in the vicinity but no contaminants above the drinking water standards were found. An EQBA Order for Title-3 funding was signed on February 3, 1992. The funding will be used to properly close and monitor the landfill. A Remedial Investigation/Feasibility Study (RI/FS) has been completed. A Record of Decision (ROD) was signed in March of 1995. The ROD calls for the following: 1.) Regrading the landfill with clean fill. 2.) Reclamation of an adjacent wetland approximately 11 acres in area. 3.) Construction of a landfill cap. 4.) Construction of a slurry wall. 5.) Construction of a leachate pump & treat (p&t) system with the resulting leachate taken to the City of Rome's sewage treatment plant. 6.) Extending the drinking water main to affected residences along Tannery Road. 7.) Construction of fencing around the perimeter of the landfill. 8.) Providing deed restrictions and continued site monitoring. Work on the water and sewer lines was completed in August 1995. Construction of the landfill cap and the leachate collection system was completed in September of 1997. Operation and maintenance procedures have been implemented.

Confirmed Hazardous Waste Disposal:

Solvents and heavy metal wastes

Quantity:

unknown

Analytical Data Available for:	Groundwater	Surface Water	Soil	Sediment
Applicable Standards Exceeded in:	Groundwater	Drinking Water	Surface Water	
Geotechnical Information:			Depth to	
Soil/Rock Type: Sandy			Groundwater:	Variable

Legal Action: Type: State Consent Order	Status: Order Signed
Remedial Action: Complete	Nature of action: Refer to the site description for details.

Assessment of Environmental Problems:

There was considerable leaching toward adjacent wetlands. Low levels of volatile organic compounds (VOCs) were found in the shallow groundwater near the landfill. Operation and maintenance procedures will help to determine the effectiveness of the remedial actions.

Assessment of Health Problems:

There were homes in the vicinity of the landfill that used private drinking water wells. Samples collected from these wells showed no organic contamination in early testing. However, one private well sampled during the Remedial Investigation had a trace of 4-methylphenol which appeared to be from overburden groundwater leaking down the casing to reach the deep well. A water main extension was constructed in 1996 and all residences are now connected to it.

RECORD OF DECISION

**ROME LANDFILL, TANNERY ROAD
CITY OF ROME
ONEIDA COUNTY, NEW YORK
ID NUMBER 633012**

**PREPARED BY
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
MARCH 1995**

DECLARATION STATEMENT - RECORD OF DECISION

Rome Landfill Inactive Hazardous Waste Site City of Rome, Oneida County, New York Site No. 633012

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedial action for the Rome Landfill inactive hazardous waste disposal site which was chosen in accordance with the New York State Environmental Conservation Law (ECL) and consistent with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 USC Section 9601, et., sec., as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

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

Assessment of the Site

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

Description of Selected Remedy

Based upon the results of the Remedial Investigation/Feasibility Study (RI/FS) for the Rome Landfill and the criteria identified for evaluation of alternatives the NYSDEC has selected waste reconsolidation, capping, leachate control, and municipal water for downgradient users for Rome Landfill on Tannery Road. The components of the remedy are as follows:

- regrading the landfill by reconsolidating approximately 244,000 cubic yards of in-place material and placing approximately 134,300 cubic yards of alternative grading material (AGM); resulting in a reduction in the landfill footprint from 57 acres to 44 acres and the recreation of approximately 11 acres of wetland;
- installation of a Flexible Membrane Liner (FML) cap over the landfill that meets NYSDEC Part 360 standards;

- construction of a full slurry wall surrounding the landfill waste, and the pumping and treatment of approximately 4 million gallons of leachate per year with treatment at the Rome POTW.
- construction of a municipal water supply extension to replace impacted and threatened private water wells along Tannery Road;
- fencing, deed restrictions, baseline groundwater monitoring, site monitoring and maintenance, and periodic reviews.

New York State Department of Health Acceptance

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

Declaration

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

Since the remedy results in hazardous waste remaining within the landfill, a long term monitoring program will be instituted. This long term monitoring program will allow the effectiveness of the remedy to be monitored by sampling and testing of the groundwater and surface water.

Date

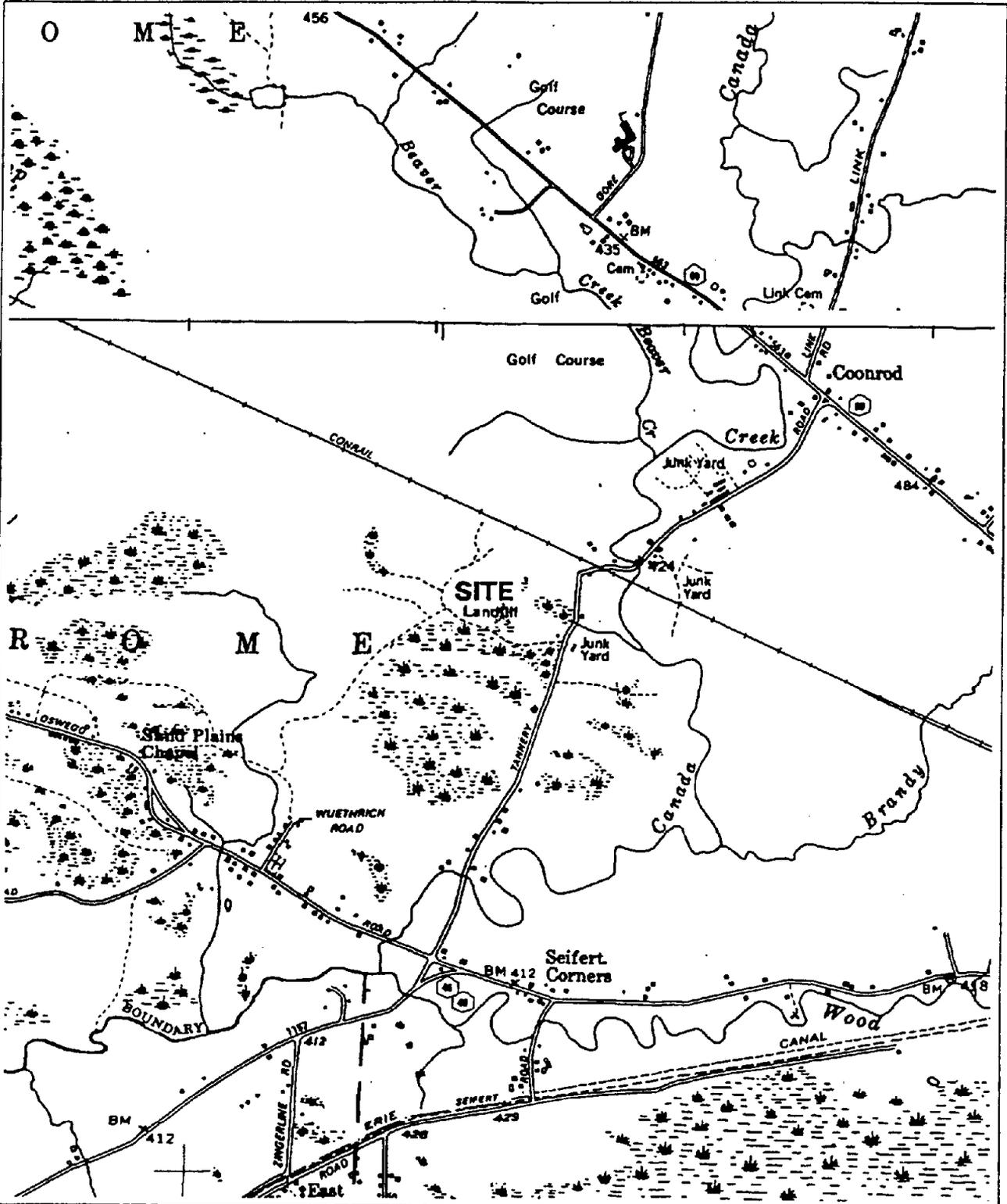
3/30/95



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

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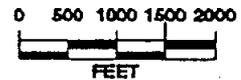
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Site Location Map

633012 Rome Landfill

NYSDOT Planimetric Quadrangle(s):
LEE CENTER, VERONA



Scale 1:24,000

RUST

Quality • Integrity • Creativity • Responsiveness

CERTIFICATION REPORT TANNERY ROAD LANDFILL REMEDiation

Prepared for:

City of Rome
Liberty Plaza
Rome, New York 13440

Prepared by:

Rust Environment &
Infrastructure
12 Metro Park Road
Albany, New York 12205

September 1998

Revised: December 1998

**Rust Environment
& Infrastructure**

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1.0 INTRODUCTION

This report has been prepared to document remediation of the Tannery Road Landfill Site. The City of Rome completed these activities to satisfy the terms of a consent order with the NYS Department of Environmental Conservation. Rust Environment & Infrastructure (Rust) provided full-time construction inspection services for the remediation work. Site remediation consisted of grading, consolidation, and closure of the landfill, installation of municipal water lines in the vicinity of the landfill, and installation of a groundwater recovery and discharge system.

Initially, the City let Contracts for placement of alternative grading material (AGM) on the landfill to bring the surface of the landfill closer to the minimum slope required for closure. During the AGM Program, Contract No. 2 was awarded to A.E. Servidone for consolidation of the landfill. Servidone excavated thin areas of waste from the edges of the landfill and reduced the landfill footprint to its current area. Contract No. 1 was awarded to Syracuse Constructors for extension of water lines, service connections, and a pumping station and force main for groundwater recovered from beneath the landfill. Contract No. 3 was awarded to Rifenburg Construction. Rifenburg completed landfill grading and capping, installed a hydraulic containment wall, and installed a groundwater recovery system.

1.1 CONTRACT NO. 1

Water and sewer line installation and connection was completed by Syracuse Constructors between August 1995 and January 1996. Spring restoration was completed in May 1996. Water and sewer line installation consisted of the following work:

- Installation of water lines on Tannery Road between Rt 69 and the southwestern crossing of Canada Creek.
- Installation of service connections to residences along Tannery Road between the two crossings of Canada Creek, where groundwater supplies were potentially affected by the Site.
- Installation of sewer force main from the Landfill along Rt 69 and southeast along Rt 69 to the northernmost City sanitary sewer manhole on Rt. 69.
- Construction of a pump station at the landfill to convey groundwater through the new sanitary sewer force main to the City collection system.

1.2 CONTRACT NO. 2

Landfill consolidation was completed by A.E. Servidone in 1995-1996. Consolidation consisted principally of the following work:

- Excavation of waste from areas east and north of the main landfill footprint and consolidation of waste on the landfill.

- Construction of two wetland areas (Mitigation Areas A and B) and preparation for future planting under Contract No. 3.

1.3 CONTRACT NO. 3

The landfill closure was completed by Rifenburg Construction between September 5, 1996 and October 15, 1997. Closure consisted principally of the following work:

- Contouring the landfill to slopes suitable for final cover,
- Installation of a subsurface hydraulic cut-off wall,
- Installation of gas vents, groundwater recovery wells, and monitoring wells,
- Construction of a cover system meeting design requirements of 6 NYCRR Part 360,
- Planting in the wetland mitigation areas, and
- Connection and start-up of a pumping system for contaminated groundwater.

2..0 SUMMARY OF LANDFILL CLOSURE

2.1 WASTE GRADING AND CONSOLIDATION

Prior to closure of the landfill, the slope of the landfill surface was less than the minimum grades by the Plans. In order to meet final grades and limit closure costs, alternative grading material (AGM) was accepted and thin areas at the edge of the landfill were excavated and consolidated on the landfill. The AGM was placed as an alternative to costly imported fill soils and generated revenue which was used to help defray other closure costs. Consolidation of the landfill reduced the area which needed to be capped. Following placement of AGM and landfill consolidation, additional fine grading work was also completed.

AGM was placed on the landfill from June 2, 1995 through May 31, 1996. The AGM was carried out in accordance with the NYSDEC approved AGM Operations Plan. AGM was accepted only from suppliers approved by NYSDEC and only after suitable analytical data was provided by the supplier. All loads of AGM received were inspected and screened by Rust's on-site monitor. A total of 103,603 tons of AGM was placed on the landfill. AGM was supplied from the following sources in the amounts listed below:

<u>Supplier</u>	<u>Tons AGM</u>
IWS	37,426
Stone River	61,594
SCS Group	261
City of Rome	3349
Arrowhead	14
Stewarts	959

Under Contract No. 2, Servidone completed consolidation of waste from December 11, 1995 to May 31, 1996. This work resulted in relocation of 340,000 CY of waste and reduction of the landfill area. In October and November 1996 under Contract No. 3, Rifenburg completed final grading of waste materials to meet the minimum and maximum grade specifications.

2.2 HYDRAULIC CONTAINMENT WALL

To control migration of impacted groundwater from beneath the landfill, and reduce long-term pumping requirements, a hydraulic containment wall was constructed around the perimeter of the landfill. The containment wall extended to a typical depth of 30-ft and penetrated ("keyed") into a relatively low permeability silt layer. The hydraulic containment wall was constructed principally as a soil-bentonite slurry wall. The section of the wall adjacent to the Ash Landfill was constructed of steel sheet piling due to a concern that excess lateral pressures exerted by the two landfill would impair construction of the slurry wall.

Prior to construction of the containment wall, the planned alignment of the wall was surveyed and staked in the field. Upon review of the alignment, it was apparent that in some areas waste would be left outside the wall, while in other areas the wall would extend some distance farther out than

needed. In order to better contain the waste and reduce the length of the wall, Rifenburg excavated test trenches perpendicular to the wall alignment at a nominal 100-ft spacing around the landfill. Rust observed excavation of the test trenches on September 25-26, 1996. Based on information obtained from the trenches, the location of the containment wall was adjusted inward or outward as appropriate.

2.2.1 Slurry Wall

Following final approval of the containment wall alignment, preparatory work began for construction of the soil-bentonite slurry wall. The slurry wall line was graded to the plan elevation and a one foot thick layer of fill 20-ft wide was placed to serve as the working pad. Rifenburg subcontracted the slurry wall construction to Terra Constructors. Terra supplied the slurry mix equipment, slurry lines, bentonite, field QC, and technical expertise for construction of the wall.

The sequence and methods of construction for the wall were generally as follow:

- Bentonite slurry was mixed in a high shear mix tank and pumped through HDPE force mains to the work location.
- A trench was excavated to the required depth (four feet into the underlying silt layer) while the bentonite slurry was made-up and pumped in to fill the trench and support the trench walls.
- Soil excavated from the trench was cast to the side on the working pad.
- A second excavator took soil from the trench and rough-mixed the slurry wall backfill. The backfill was first prepared by removing garbage, stumps, and other debris and then blending in bentonite and slurry from the trench to produce a backfill of the required consistency.
- The bentonite addition rate was determined by the spacing of 2000-lb "Super-Sacks" of bentonite powder along the wall alignment. The application rate for dry bentonite (which neglected the amount added by wetting the mix with trench slurry) was selected as 2.5% based on mix tests performed by ATL. Based on QC testing of the wall after placement, the bentonite application rate was reduced to 2% on October 17, 1996 and to 1½% on November 22, 1996.
- A third excavator then finished mixing the backfill and placed the backfill in the trench.

Slurry wall construction began on October 8, 1996. On October 23, 1996, the silt layer was found to extend to a depth of 32-ft, which was deeper than shown on the Plans and deeper than could be excavated using the excavator which Rifenburg had mobilized for the job. The trench was backfilled and slurry wall construction was temporarily halted while a larger excavator was mobilized to the site. On October 31, 1996, construction of the slurry was resumed. Due to the delay associated with

increased wall depth, Rifenburg was allowed to extend operations to two 10-hour shifts on November 4, 1996. During the week of November 10, 1996, heavy rains, snow and temperatures below 10° slowed construction of the slurry wall. Construction of the slurry wall was completed on December 6, 1996. Two feet of clay was compacted in the top of the slurry wall trench, and the pad was leveled to drain and prevent erosion over the winter.

2.2.2 Sheet Pile Wall

Upon survey of the sheet pile wall alignment, it became apparent that the contract quantity for sheet piling was significantly lower than that which would be required to place sheeting to the length and depth required. Two steps were taken to reduce the quantity of sheet pile required. First, Rifenburg excavated waste from between the landfills for use as grading material elsewhere on the landfill. And second, a Change Order was issued to Rifenburg to drill test bores along the sheet pile wall section to verify the depth to the silt layer. ATL drilled three test bores on December 4, 1996. Data from the bores did not allow a reduction in the wall depth, but did provide valuable information which verified that the sheet piles would key into the silt layer.

The sheet pile wall was installed by Tioga Construction from April 28 to May 9, 1997. Piling was driven to a depth two feet below grade, and the two foot trench was backfilled with compacted clay. Most piling was driven by a 2-ton vibratory hammer. For piling which met resistance, a 8-ton hammer was mobilized to the site on May 8, 1997 and successfully drove the sheet piles that had previously resisted being driven to depth. The sheet pile wall overlapped into the slurry wall backfill to form a continuous barrier.

Due to the proximity of the Ash Landfill to the sheet pile wall and the presence of slopes less than 3:1 on the Ash Landfill, vibration monitoring was performed throughout the sheet pile installation. Vibration levels did not approach the pre-determined action levels and no evidence of movement was observed on the Ash Landfill.

2.3 FINAL COVER SYSTEM

The final cover system was constructed over the landfill with only minor deviations from the Plans as shown on the Record Drawings. The final cover consisted of filter fabric placed over the prepared waste grades, 12-inches of gas vent sand, a 40-mil LLDPE geomembrane, 18-inches of barrier protection sand, and 6-inches of topsoil. Construction of the individual components on the cover system is described below.

2.3.1 Gas Vent Layer

After grading of waste and acceptance of finished waste grades, the waste surface was prepared for fabric placement by removing large debris and sharp objects (e.g. tires, steel rod) from the surface. Fabric was rolled down slope on the waste surface and machine sewn together. The function of the fabric was to provide physical separation of the gas vent layer from the underlying waste. Fabric installation began on November 20, 1996 and was halted on December 3, 1996 after placement of approximately five acres of fabric due to QC issues discussed in Section 3.3.1. Fabric installation

resumed on January 8, 1997 following resolution of QC issues. Placement of the sand progressed approximately five acres ahead of the gas vent sand and was completed on January 30, 1997, with the exception of the east slope which was left open pending installation of the sheet pile wall. Fabric was completed on the east slope during the period on May 15 to May 23, 1997, after sheet pile installation.

Sand for the gas vent layer was obtained from Aikens Pit, near the landfill. A valid NYS Mining Permit was in place prior to removal of any material from the source. Hauling of sand from the Pit was delayed somewhat by the need to construct and access road adjacent to wetlands. Wetland issues relative to the haul road were addressed to the satisfaction of NYSDEC Region 6 and the road was constructed in December 1996.

The gas vent sand was initially placed from January 7 through February 11, 1997 over all of the landfill except the east slope which was left open pending installation of the sheet pile wall. Where snow accumulated, it was removed from the fabric prior to placement of the sand. The gas vent sand was final graded, rolled, and its thickness verified in May 1997. Where necessary, sand was added to meet the minimum 12-inch thickness required. The gas vent was approved in sections immediately prior to installation of the geomembrane. Gas vent sand was completed on the east slope during the period on May 21 to June 10, 1997, after sheet pile installation.

2.3.2 Geomembrane

Geomembrane was installed by Chenango Construction. 40-mil LLDPE Amoco membrane was installed over the entire landfill. On areas with steeper slopes, textured membrane was used. Membrane installation was in accordance with the panel lay-out submitted by Chenango and approved by Rust. Membrane installation began on May 14, 1997. On May 20, 1997 a second Rust inspector began work on site due to the multiple on-going activities associated with cover construction. On June 11, 1997 membrane placement was completed. Testing and detailing continued until June 19, 1997 when the final gas vent and recovery well boots were installed.

On June 9, 1997 a gas "bubble" was noted under the membrane. Similar "bubbles" continued to occur through mid-July but decreased in frequency, presumably as the gas vent sand dried and become more permeable. AS bubbles developed, the membrane was pierced to release pressure. On August 12 through August 14, 1997 Chenango returned to the site to repair the gas bubbles and connect boots around final items such as recovery wells and electrical items.

2.3.4 Barrier Protection Soil

Upon receipt of all membrane data and approval of the results, a Rust inspector performed a final visual inspection the membrane and released the completed sections of membrane for placement of the barrier protection layer. Sand from the Aikens Pit (across Tannery Road from the Site) was used as the barrier protection soil. Placement of barrier protection soil began on May 27, 1997.

Where truck traffic was required over the membrane, a minimum 2-ft layer of barrier soil was placed to protect the membrane. Throughout placement of the initial lift of barrier soils, the membrane was

monitored to assure that wrinkles or folds were not being produced by placement of the soils. To prevent placing debris that could potentially damage the membrane, Rifenburg monitored loading operations and Rust periodically monitored placement operations. Where necessary, debris was removed by hand from the barrier soil prior to grading and compaction. Placement of barrier protection soil was in August 1997.

2.3.5 Topsoil and Vegetation

Topsoil was imported to the landfill from the Marina Pit where soil was being excavated adjacent to the NYS Barge Canal to expand a marina. Placement of topsoil began on July 14, 1997. Topsoil was placed loose and raked repeatedly to loosen the material and remove wood and other debris. Drainage berms on the landfill were built using topsoil.

Hydroseeding of the landfill began on July 31, 1997. The mixture applied was as follows: creeping red fescue (44 lb/acre), perennial ryegrass (44.5 lb/acre), Kentucky bluegrass (16 lb/acre), annual ryegrass (11 lb/acre), white clover (7.5 lb/acre), alfalfa (4 lb/acre), timothy (4 lb/acre), and 10-10-10 fertilizer (800 lb/acre). Hay mulch was applied after hydroseeding. Topsoil placement was completed on August 25, 1997.

On August 12 to August 19, 1997 the stone lined down chutes were constructed.

2.4 LEACHATE RECOVERY AND MONITORING

Leachate recovery wells were installed through the landfill and completed in the underlying sand layer immediately above the till layer. Monitoring wells were also installed through the landfill to allow monitoring of water levels within the hydraulic containment walls.

2.4.1 Extraction Wells

To determine the most effective screen and gravel pack design for the well, ATL drilled test bores at the proposed recovery well locations from January 14 - 31, 1997. The well design was based on the gradation of sand recovered from the test bores.

The extraction wells were installed by Bates Well Service and were constructed with intermediate casing through the landfill waste. ATL developed the recovery wells and performed yield testing of the wells from June 3 - 13, 1997. Based on the results of the yield tests, a 1/2-Hp pump was selected for RW-2 and 1/3-Hp pumps were selected for RW-1, RW-3, and RW-4.

2.4.2 Pumping and Piping Systems

The design plans originally called for installation of the pump discharge piping above the geomembrane, and freeze-protection of the pipe by heat tracing. Based on discussions with NYSDEC, the piping was relocated beneath the membrane. Relocation of the piping reduced the potential for environmental impacts in the event lines leaked, reduced construction costs by

elimination of the heat tracing, and reduced electric service costs through reduced power consumption.

Leachate lines were installed from the individual wells to the Meter Pit in the fall of 1996 prior to fabric placement. The leachate lines were pressure tested with air on June 19, 1997 (after membrane installation) and the lines to wells RW-1 and RW-2 were found to have significant leaks. The leachate lines were excavated and repaired on June 30, 1997. The membrane was repaired on July 1, 1997.

On August 7 - 8, 1997 Bates Well Service installed pitless adapters and set pumps and stilling tubes in the recovery wells.

On July 14, 1997 installation of power and control conduits from the site entrance to the meter pit began. On July 16, 1997 OHSWA granted an easement for electrical lines and excavation of trenches and conduit installation was begun. Niagara Mohawk installed primary service from Tannery Road to the new transformer at the meter pit on the landfill between July 22 and July 25, 1997. On August 6, 1997 electricians began pulling power and control wiring. Panels were delivered to the site on August 25, 1997. Stilsing returned to the site on August 27 to pull wiring and make connections. On August 28 conduits were abandoned since wiring could not be pulled. On September 3, 1997 Stilsing completed installation of new conduits and began pulling wire. On September 8, 1997 the meter pit and panels was essentially complete and leachate pumping was commenced.

2.4.3 Discharge System

Gravity sewer discharge piping was installed from the edge of the landfill to the pump station constructed under Contract No. 1. The majority of the gravity line was installed between December 11, 1996 and December 20, 1996. Connection of the final downstream section between the last manhole and the pump station was attempted on January 21, 1997, but was abandoned due to excess frost in the ground.

A 3-inch gravity line was installed from the Meter Pit to the edge of the landfill on August 4, 1997. On August 21, 1997 the final downstream section of gravity sewer and connected to the pump station and the final upstream manhole (adjacent to the landfill) was installed and final connections were made to the 3-inch line and the downstream gravity sewer.

2.5 LANDFILL GAS CONTROL

2.5.1 Passive Vents

Passive vents consisted of perforated PVC pipe and a "gooseneck" were bedded in clean crushed stone and joined with a boot to the membrane prior to placing the barrier protection soil. Vents were installed at a density of one per acre.

2.5.2 Gas Igniters

Due to high levels of hydrogen sulfide gas around seven of the passive vents, igniters (flares) were installed. The flares were purchased from Landfill Technology (LTI), W. Sand Lake, NY, and were set by LTI and Rust personnel on November 11, 1997. The igniters are equipped with a small solar panel which produces electricity to strike a spark plug twice per second. The spark serves to continuously ignite gases, including hydrogen sulfide, which come from the vents.

2.6 ADDITIONAL CLOSURE ACTIVITIES

2.6.1 Wetlands Mitigation

An invert was set and gravity drain pipe installed to control the level of water in Mitigation Area B. Draining of accumulated water began April 28, 1997 and required approximately one week. Old Oak was subcontracted to do wetland plantings. Planting in Areas A and B was done between June 18 and July 7, 1997. Plantings were in accordance with the plans with the exception of minor relocation of plants in Area A to provide better survival of the plants. The stone bank along Area B was covered with topsoil and grubbing materials from Aikens Pit to promote vegetation growth on the bank and make the wetland more accessible to wildlife.

2.6.3 Security Fence

The design of the fence was revised to a 6-ft final height and personnel gates were installed to allow access to wells for monitoring. On September 2, 1997 Rapasadi began driving posts. Installation of the posts and wire was completed on September 19, 1997.

3.0 CONSTRUCTION QUALITY ASSURANCE

3.1 WASTE GRADING AND CONSOLIDATION

The waste grading and consolidation work at the landfill extended from the start of AGM placement on June 2, 1995 through final acceptance of waste grading by Rifenburg under Contract No. 3 in November 1996.

3.1.1 AGM Monitoring

Prior to acceptance of an AGM source, the suitability of the source was determined by review of material test data and information on the source of the AGM. NYSDEC approval was obtained prior to acceptance of AGM from any new source. The only known instance in which materials placed did not conform with the approved AGM Plan was the approval and acceptance of "Propat." Propat consists of shredded auto interiors. The supplier submitted TCLP and PCB analyses and the material was approved for disposal based on this data. On further investigation in July 1996, it was found that total PCB concentrations exceeded criteria set by the AGM Plan. Since the PCB levels did not exceed those allowed in NYCRR Part 360 landfills and the site was being encapsulated using a 360 cap with a slurry wall keyed into a clay layer, NYSDEC did not require removal of the Propat and the material was graded and capped in place. The AGM program was monitored on a daily basis by a Rust inspector who verified tickets and monitored the loads for to verify that materials conformed to the AGM Plan requirements. Materials which did not meet the AGM Plan requirements were rejected or removed from the site when discovered. A total of approximately 20 loads of proposed AGM were rejected by Rust throughout the duration of the AGM program.

As indicated in Section 2.1, above, a total of 103,602.87 tons of AGM were accepted for regrading. Based on the tipping fees negotiated with the individual suppliers for the City's acceptance of this material, planned revenue was \$208,410.05. Actual fees collected by the City totaled \$119,429.30. Discrepancies between planned and actual revenues were due to the following:

(1) IWS - \$29,334.31

IWS was not originally required to pay prevailing wage rates to its supplied equipment operator for spreading and compaction of IWS's supplied AGM material. As a result of a NYS Department of labor finding, the City refunded \$29,334.31 to IWS to cover IWS's unpaid wages and supplements.

(2) Stone River - \$22,920.83

Stone River was not originally required to pay prevailing wage rates to its supplied equipment operator for spreading and compaction of the Stone River's AGM material. As a result of a NYS Department of labor finding, the City refunded \$29,334.31 to Stone River to cover Stone River's unpaid wages and supplements.

(3) Stone River - \$33,530.15

Stone River failed to pay fees in the amount of \$33,530.15 for AGM accepted by the City. The City commenced collection efforts throughout 1996 and into 1997 with Stone River, including submittal of certified collection letters. When these efforts proved unsuccessful, the City commenced legal action in the New York State Supreme Court in July 1997 and subsequently filed a motion for default judgement. While the City's received the order for default judgement in 1998, this also proved futile in actual collection of monies by the City from Stone River.

(4) IWS - \$3,195.46

In 1996 IWS claimed that AGM loads were inappropriately rejected by Rust's AGM monitor. IWS claimed that the load rejections cost them \$900 each on eight loads for a total claim of \$7200. Since the City felt that there was some merit to IWS's claim, the City negotiated a settlement with IWS for 50% of the \$7200 claim. The claim was settled by allowing IWS to bring in approximately 1600 tons without charge. The actual tonnage supplied by IWS was 1597.73, which at \$2/ton represented a total of \$3,195.46 of uncollected revenue.

3.1.2 Waste Relocation

Waste relocation was completed under Contract No. 2 by Servidone to reduce the landfill area and thereby reduce costs for final capping. Oversight of consolidation was performed for payment quantity verification and to determine the physical limits of waste at the perimeter of the landfill. The physical limit of waste were reached in all areas with the exception of thin layers of widely dispersed very old inert waste. The general area of the landfill was reported by local residents to have been used as a dumping and burning ground well over 100 years ago. Due to the age, character, and minimal quantity of such old buried waste materials, their removal was judged to cause more disturbance to the environment than was warranted.

3.1.3 Final Grading

Final grading of the landfill surface was completed under Contract No. 3 by Rifenburg. Grades were verified by surveying performed by a NYS Licensed Surveyor retained by Rifenburg. The survey verified that final cover grades were between met the project specifications and that the slopes provided positive outward drainage of the surface.

3.2 HYDRAULIC CONTAINMENT WALLS

3.2.1 Slurry Wall

The principal objectives for the slurry wall inspection and testing were as follow:

- Verification of a three foot "key" into the underlying silt layer - This was accomplished by inspection of trench excavation spoils and visual identification of the silt layer which underlies the entire site. Depths were sounded with a weighted

tape when the silt surface was first encountered and again to verify the three foot key into the silt. Trenches left open overnight were sounded and cleaned out as necessary to removed settled sand.

- Maintenance of slurry quality - This was accomplished by field testing slurry density and viscosity during operations. Slurry was wasted onto the landfill and replenished with fresh slurry when slurry properties fell out of the required ranges.
- Proper mixing and preparation of backfill - This was accomplished through inspection of the operations and testing slump and density of backfill prior to placement. Bentonite application rates were predetermined by the placement of the bentonite super-sacks along the trench.
- Final in-place slurry wall properties - This was tested by retrieving tubes of the in-place wall and laboratory permeability tests performed by ATL.

Testing data for slurry wall installation indicate that the wall was constructed to permeabilities of less than 1×10^{-6} cm/sec and that the wall was keyed at least three feet into the underlying silt layer.

Table 1 summarizes the QC testing results for the slurry wall.

3.2.2 Sheet Pile Wall

Prior to installation of the sheet pile wall, test bores were performed to verify the depth to the underlying silt layer. Based on these test bores, sheeting was ordered in required lengths, and lengths verified on delivery of piling to the site. During driving, increased resistance was noted on driving into the denser silt layer. The increased driving resistance indicated a key into the silt layer.

3.3 FINAL COVER SYSTEM

3.3.1 Geotextile Fabric

Fabric was placed over the waste to separate the gas vent sand from underlying wastes. On delivery of fabric to the site, fabric was stored in a manner to prevent physical damage and roll numbers were recorded from the manufacturer's tags. The fabric roll numbers were checked against test data supplied by the manufacturer for the individual rolls. In all instances, test data met minimum materials properties specified for the project. During installation, the principal concerns were:

- Removal of surface debris from the subgrade so as to prevent punctures in the fabric during sand placement - This was accomplished through subgrade inspection during and after placement of the fabric. Where necessary, fabric was cut and repaired to allow removal of sharp objects missed during the initial inspection.
- Completion of continuous seams of good quality - Seaming was inspected and work halted when weather conditions (e.g. excess cold or mud) were not suitable for

seaming. Finished seams were spot checked for integrity prior to placement of the gas vent layer.

3.3.2 Gas Vent Sand

Gas vent sand was initially placed under poor weather conditions in January - February 1997. The sand layer thickness was verified, and additional sand placed as needed in May-June 1997. Gas vent sand test data from ATL indicated all material met the specified gradation and permeability criteria. During placement of the gas vent sand, the principal QA objectives were as follow:

- Material inspection, tracking, and control - This was accomplished by testing of the gas vent sand source. Sand testing was conducted by digging test pits on a grid and retrieving samples for analysis by ATL. A grid at 100-ft centers was laid out which for excavation to a 10-ft lift thickness. From each grid, four grain size samples were analyzed and a composite of the four samples was tested for permeability. During sand excavation and placement, the sand was visually inspected for roots and other debris.
- Gas vent layer thickness - This was inspected prior to membrane placement by hand excavating small pits at 100-ft centers and where low spots were suspected. Additional gas vent sand was placed where the thickness was less than one foot.

Table 2 provides a summary of the QC Testing data for the gas vent sand.

3.3.3 Geomembrane

Membrane was installed by Chenango Construction. During placement of the membrane, the principal QA objectives were as follow:

- Panel lay-out - Prior to commencing membrane installation, Chenango prepared a panel lay-out drawing which indicated the orientation of the proposed panels and the limits of textured membrane placement on side slopes.
- Membrane storage, handling, and material test properties - membrane delivered to the site was stored to prevent physical damage and roll numbers were recorded from the manufacturer's tags. The fabric roll numbers were checked against test data supplied by the manufacturer for the individual rolls. In all instances, test data met minimum materials properties specified for the project.
- Subgrade (gas vent sand) approval - Sand thicknesses were verified, as described above, prior to approval of individual sections of the cover for membrane placement.
- Seaming and testing - Membrane seaming operations were conducted only under weather conditions meeting those recommended by the manufacturer (suitable temperatures and no rain). Seaming was inspected periodically to assure that

membrane being seamed was clean and dry. Finished seams were also inspected for visual appearance as this is an indication of seam quality. Double seams were installed and, upon completion, the interior space or the seam was pierced from above with a needle and a vacuum applied to serve as a final check of in-place seam integrity. The quality of seams was tested in an on-site facility by Chenango and periodically by a commercial laboratory (Performance Testing).

- Repair and boot testing - Where the membrane had been damaged or cut out for testing, and where boots had to be formed around penetrations, patches were installed and tested by vacuum box to verify integrity of the seams.

Following completion of the initial membrane installation, repairs were necessary on two occasions. After membrane installation, gas pockets formed under the membrane as several point and had to be pierced to relieve pressure. Penetrations were repaired by Chenango. In January 1998, leaks occurred at three of the recovery well pipe connections. The leaks necessitated cutting of the liner. Penetrations were repaired by Chenango.

Table 3 summarizes the QC testing data for the membrane. Membrane seam air test logs are provided in Appendix A. Membrane seam vacuum test logs are provided in Appendix B. Membrane seam field destructive test logs are provided in Appendix C.

3.3.4 Barrier Protection Soil

Barrier protection soil was placed in two lifts from June - August 1997. The principal QA objectives were as follow:

- Material inspection, tracking, and control - This was accomplished by testing of the Barrier protection soil source. Barrier protection soil testing was conducted by digging test pits on a grid and retrieving samples for analysis by ATL. A grid was laid out and sampled in the manner described above for gas vent sand testing. All proposed barrier protection soil was tested and found to meet the project specifications prior to removal from the pit. During Barrier protection soil excavation and placement, the soil was visually inspected for roots and other debris.
- Membrane approval and protection - Membrane sections were approved for Barrier protection soil placement on receipt of Performance Testing reports. During placement of the initial Barrier protection soil, operations were monitored to verify that roots and other debris were not placed directly on the membrane and to verify that membrane had not rolled under the effort of placing the cover soil. Truck haul routes were constructed by placing a 2-foot lift of soil on the membrane. During placement of the initial lift, operations were also carefully monitored to assure that tracked vehicles did not turn excessively over thin soil cover.

- Each of the two lifts of Barrier protection soil was tested by ATL using a Troxler Gauge to verify in-place density. Testing indicated all barrier protection exceeded 90% density, and the vast majority of material exceeded 100% density.
- Barrier protection soil thickness - This was inspected prior to topsoil placement by hand excavating small pits at 100-ft centers and where low spots were suspected. Additional Barrier protection soil was placed where the thickness was less than required.

Table 4 provides a summary of the QC testing data for the barrier protection material. Appendix D provides the soil compaction test logs for the barrier protection soil.

3.3.5 Topsoil & Vegetation

Barrier protection soil was placed in two lifts from June - August 1997. The principal QA objectives were as follow. Numerous topsoil source had been proposed by Rifenburg prior to the Marina Road Pit which was ultimately used. Based on a review of the source data and comparison to other local topsoil sources, the material was approved even though some samples marginally failed the specification for minimum organic content of 2% or the minimum soil pH of 5.5. The soil was limed after installation, and the organic content was not judged to limit vegetation growth since the soil was to also be fertilized.

3.4 LEACHATE RECOVERY

3.4.1 Extraction Wells

To allow design of efficient gravel packs, test bores were performed in each of the four recovery well locations. Based on the test boring data, screen and gravel pack specifications were provided by Rust for the wells. Wells were logged by ATL in accordance with directions provided b a Rust geologist. Construction QA for well installation consisted of measuring pipe and screen dimensions, verifying quantities of gravel installed, and verifying depths in the well during completion. Following well installation, ATL performed pump tests and reported the results to Rust to aid in sizing the well pumps for maximum recovery.

3.4.2 Pumping System

Upon completion of the pump and control system installation, a functional test of the system was performed to verify operations. Chronic problems occurred with the pump in well RW-2, which ultimately resulted in removal and testing of the pump and replacement of the motor starter. Other than the problems with RW-2, the system functioned as designed.

3.4.3 Piping and Discharge Systems

Piping and discharge systems were tested for leaks. One-inch piping from the recovery wells to the meter pit was air tested, and two lines were repaired as indicated by the tests. Gravity lines and

manholes were leak tested between August 25 and September 5, 1997. Leaks were repaired at Manhole N and in the 3-inch gravity line. Manholes were leak tested by installing a downstream plug and filling each to the rim with water. Water was allowed to stand for 24-hours. Manholes were rejected and repaired for any evidence of leakage.

3.5 LANDFILL GAS CONTROL

Crushed stone for the gas vents was tested for approval and the vents were inspected during construction. The vents functioned as intended except for freezing of condensate on the screens. Screens were perforated to prevent freezing during subsequent winters.

In September 1997, due to local resident complaints, hydrogen sulfide levels were surveyed at the vents. Eight vents were found to have relatively high levels of hydrogen sulfide gas. These eight vents were fitted with solar powered gas igniters supplied by Landfill Technology. Complaints have not been received since installation of the igniters.

3.6 ADDITIONAL CLOSURE ACTIVITIES

Additional closure activities including wetlands mitigation, security fence installation, and construction of the access road were monitored for conformance to the specifications. No further QA was warranted for these activities.

5.0 CERTIFICATION

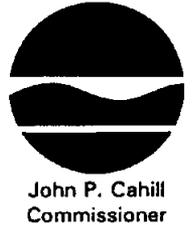
I hereby certify, as a Professional Engineer, licensed in the State of New York, that Rust Environment and Infrastructure of New York monitored remediation of the Tannery Road Landfill Site, that the work was completed in conformance with the NYSDEC approved Contract Documents, and that this Certification Report accurately describes and documents the work completed.

Rust Environment & Infrastructure, of New York


Alan W. Tavenner, Professional Engineer Lic No. 068083

A. Sylvester

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Hazardous Site Control, Room 252
50 Wolf Road, Albany, New York 12233-7010
Phone: (518) 457-8807 FAX: (518) 457-8989



MAR 10 1999

This letter was sent to the people on the attached list.

Dear :

The Department of Environmental Conservation (DEC) maintains a Registry of sites where hazardous waste disposal has occurred. Property located at Tannery Road in the City of Rome and County of Oneida and designated as Tax Map Number 221.00-1-7.1 was recently as a Class 4 in the Registry. The name and site I.D. number of this property as listed in the Registry is Rome Landfill, Site #633012.

The Classification Code 4 means that the site is properly closed -- requires continued management.

We are sending this letter to you and others who own property near the site listed above, as well as the county and town clerks. We are notifying you about these activities at this site because we believe it is important to keep you informed.

If you currently are renting or leasing your property to someone else, please share this information with them. If you no longer own the property to which this letter was sent, please provide this information to the new owner and provide this office with the name and address of the new owner so that we can correct our records.

The reason for this recent classification decision is as follows:

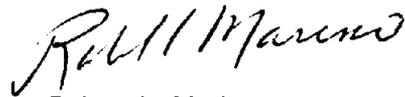
- The selected remedy has been completed in accordance with the Record of Decision (ROD) and the approved design. A final inspection was held and the Engineers certification is included in the Remedial Action Report. A long term Operation and Maintenance (O&M) plan has been approved by the NYSDEC. Thus, reclassification to class 4 is justified.

NOTE: Deed restrictions, as required by the ROD, were not placed on this property since the site will remain on the registry as a class 4 site and continue to be subject to Part 375 regulations.

If you would like additional information about this site or the inactive hazardous waste site remedial program, call:

DEC's Inactive Hazardous Waste Site Toll-Free Information Number 1-800-342-9296 or
New York State Health Department's Health Liaison Program (HeLP) 1-800-458-1158, ext. 6402.

Sincerely,



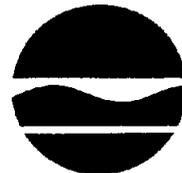
Robert L. Marino
Chief
Site Control Section

bcc: R. Marino
J. Swartwout
D. Sweredoski, R/6
R. Vaas, R/6
S. Litwhiler, R/6
A. Sylvester
A. Carlson
L. Ennist

AS/srh

A. Sylvester

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Hazardous Site Control, Room 252
50 Wolf Road, Albany, New York 12233-7010
Phone: (518) 457-8807 FAX: (518) 457-8989



John P. Cahill
Commissioner

FEB 22 1999

City of Rome
City Hall
Rome, NY 13440

Dear Sir/Madam:

As mandated by Section 27-1305 of the Environmental Conservation Law (ECL), the New York State Department of Environmental Conservation (NYSDEC) must maintain a Registry of all inactive disposal sites suspected or known to contain hazardous waste. The ECL also mandates that this Department notify the owner of all or any part of each site or area included in the Registry of Inactive Hazardous Waste Disposal Sites as to changes in site classification.

Our records indicate that you are the owner or part owner of the site listed below. Therefore, this letter constitutes notification of change in the classification of such site in the Registry of Inactive Hazardous Waste Disposal Sites in New York State.

DEC Site No.: 633012
Site Name: Rome Landfill
Site Address: Tannery Road, Rome, NY 13440

Classification change from 2 to 4

The reason for the change is as follows:

- The selected remedy has been completed in accordance with the Record of Decision (ROD) and the approved design. A final inspection was held and the Engineer's certification is included in the Remedial Action Report. A long term Operation and Maintenance (O&M) plan has been approved by the NYSDEC. Thus, reclassification to class 4 is justified.

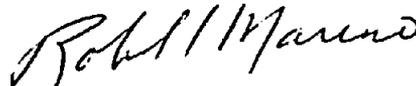
NOTE: Deed restrictions, as required by the ROD, were not placed on this property since the site will remain on the registry as a class 4 site and continue to be subject to Part 375 regulations.

Enclosed is a copy of the New York State Department of Environmental Conservation, Division of Environmental Remediation, Inactive Hazardous Waste Disposal Site Report form as it appears in the Registry and Annual Report, and an explanation of the site classifications. The Law allows the owner and/or operator of a site listed in the Registry to petition the Commissioner of the New York State Department of Environmental Conservation for deletion of such site, modification of site classification, or modification of any information regarding such site, by submitting a written statement setting forth the grounds of the petition. Such petition may be addressed to:

John P. Cahill
Commissioner
New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233-0001

For additional information, please contact me at (518) 457-0747.

Sincerely,



Robert L. Marino
Chief
Site Control Section
Bureau of Hazardous Site Control
Division of Environmental Remediation

Enclosures

bcc: E. Barcomb
R. Marino
J. Swartwout
A. Sylvester

w/Enc. (Copy of Site Report form only)
A. Grant
A. Carlson, DOH
S. Ervolina
J. Drabicki, R/6
D. Sweredoski, R/6
R. Vaas, R/6
W. Daigle

AS/srh