EMPIRE GEO SERVICES, INC.

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Date: 10-27-05

To: ED HAMPSTON

Company: NYSDEC - DIV. OF ENV. PERM.

Fax Number: 518 402-9819

Re: LUSTER-COATE NOISE PLAN

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Number of pages to follow: _____

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LUSTER-COATE METALLIZING CORP. PROPERTY
32 EAST BUFFALO STREET
VILLAGE OF CHURCHVILLE, MONROE COUNTY, NEW YORK
NYSDEC SITE NO. : 828113

PROPOSED WORK PLAN
FOR
SAMPLING OF SOILS
AND
PROPOSED WORK PLAN
FOR
REMOVAL OF PCB-CONTAMINATED SOILS

Prepared by:

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Prepared for:

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I. SITE DESCRIPTION

A. Site Location and Features

The Luste-Coate Metallizing Corporation property is located at 32 East Buffalo Street in the Village of Churchville, Town of Riga, Monroe County, New York (Refer to Figure 1). The property consists of about 4.5 acres mostly covered with asphalt pavement and building structures. A main building with a footprint of approximately 36,000 square feet covers much of the site. Four (4) warehouse buildings of varying sizes are also located on the property.

Black Creek is located along the west and northwest perimeter of the site near the main building. The surrounding area is primarily residential with some commercial properties along Buffalo Street, on the opposite side of Black Creek to the west.

B. General Geology

According to the Surficial Geologic Map of New York-Finger Lakes Sheet (1988), the site is underlain by glacial till soils. The Soil Survey of Monroe County (1973) maps the site as being underlain by the Colonie loamy fine sand soil series and the Ontario loam soil series. The Colonie loamy fine sand soils are mapped as being located along the western portion of the site and are described as deep, well-drained, coarse textured soils formed in water-laid deposits (deltaic and sand bar deposits). The remainder of the site is mapped as being underlain by the Ontario loam soils, which are described as deep, well-drained, medium textured and moderately coarse textured. These soils are typically found on glacial till plains.

According to the Geologic Map of New York, Niagara Sheet (1970), the bedrock within the area of the site has been mapped as the Camillus Shale.

C. Land Use-Potential Environmental Concerns

As reported in Shaw's Project Management Work Plan, environmental site assessments (ESAs) were completed by ENSR International in 2001 and Secor International Inc. in 1998. The ENSR investigation revealed the presence of elevated semi-volatile organic compounds (SVOC) concentrations in the soils near the area of the caustic rinse sump and SVOCs and volatile organic compounds (VOCs) were detected in the soil and groundwater near the off-site fuel storage tank. Elevated metals were also detected in the soil and groundwater.

In October of 2004 and April 2005, Shaw collected samples across the site. The analytical results revealed a presence of VOCs, SVOCs, Metals, polychlorinated byphenyls (PCBs), and pesticides.

At this time, Empire has been selected to perform additional sampling of surface soils on the site property and adjacent residential properties to further delineate PCBs which may be present within the surface soils. Following the delineation, Empire will perform selected excavation of PCB contaminated soils.

II. PROPOSED SOIL SAMPLING

A. Surface sampling will be performed by a combination of hand augers and direct push sampling. Between 15-20 soil samples will be collected as shown on Figure 2. At a minimum, the following samples will be collected as determined by the NYSDEC:

   a. 2 surface samples from 0"-3" will be collected by the existing garage;

   b. 2 surface samples from 0"-3" will be collected behind the existing fence;

c. 1 deep sample from about 2' depth will collected behind fence (not in already delineated "hot" areas);

d. 2 samples will be collected in the garden area (1 surface sample, 1 sample from beneath the organic matter/topsoil);

e. 2 samples will be collected in the backyard lawn of southern properties from the surface and at a depth of about 2';

f. Direct push sampling will be performed in area of driveway at about 4 locations, samples will be collected from beneath the subbase and at a depth of about 4';

g. Direct push sampling will be performed along fence line with samples collected at depths of about 2' and 4'.

*Additional samples will be collected and held for possible future analytical, if found necessary, as per the NYSDEC.

B. The hand sampling tools (i.e. hand augers, shovels, etc.) will be decontaminated between sample locations using an Alconox wash and potable water rinse.

C. The direct push sampling tools (i.e. samplers and rods) will be decontaminated between sample locations and sample intervals using an Alconox wash and potable water rinse. New sample tube liners will be utilized for the collection of each soil sample. The decontamination of the direct push tools and use of a new sample liner for each soil sample collected will be performed to prevent the carryover of contamination from one location or sample interval to the next.

D. Since VOCs have been detected in the past at various locations across the site, soil samples will be screened by Empire in the field with a photo-ionization detector (PID).

E. Contaminated soil generated by drilling and sampling operations will be staged on site on and under plastic sheeting for proper disposal upon completion of field activities. Wastewater produced by equipment decontamination will be drummed for similar handling.

F. A site survey will be completed to tie all new sample locations into the existing data.

III. BASELINE LABORATORY ANALYTICAL PROGRAM

A. Delineation Grab Samples: Selected soil samples collected through completion of Task II will be preserved and submitted for confirmatory laboratory analysis, currently assumed to be EPA Method 8082.

B. Disposal Composite Sample: A disposal composite sample from the residential lawn areas will be collected prior to future soil removal operations. The soil sample will be analyzed for a full TCLP, along with pH, and ignitibility. TCLP is one of the Federal EPA test methods that are used to characterize waste as either hazardous or non-

hazardous for the purpose of disposal. TCLP is an acronym for Toxicity Characteristic Leaching Procedure.

IV. SURFACE SAMPLING REPORT SUBMITTAL

A. Following completion of all field sampling activities, an interim report will be provided to your office and will consist of a site sketch indicating new soil sample locations and PID results.

B. Following completion of the updated site survey and baseline laboratory testing, a final report will be submitted and will include the information in Task VI-A above as well as laboratory findings as compared to NYSDEC recommended soil cleanup goals. The final report will include a scaled site plan, PID reading plot, and total PCB plot as appropriate. In addition, Empire will identify areas recommended for excavation and will outline soil/fill management procedures which will be followed during the soil removal operations.

V. PRELIMINARY PLAN FOR REMOVAL OF PCB CONTAMINATED SOILS

As indicated in IV-B, the final report summarizing the delineation of PCBs in the surface soils will also outline the soil/fill management procedures which will be followed during soil removal operations. Empire has included a preliminary plan for removal of PCB contaminated soils at the site, as follows:

A. Excavation will performed based upon the results the surface soil sampling. Empire will utilize a backhoe and hand-shoveling to perform the PCB contaminated soil removal.

B. Excavated soil will be properly managed until off-site disposal occurs. Depending on the results of the surface soil sampling, disposal may occur either by utilizing roll-off containers, dump trucks, or stockpiling, or combination thereof.

C. Once the planned extent of excavation has been reached based upon the previously identified area and field screening (through use of PID) does not indicate any presence of volatile contamination, confirmatory may be collected from the bottom and sidewalls of the excavated areas.*

D. Confirmatory samples will be analyzed for PCBs by EPA Method 8082 using a rapid turn-around-time, allowing results to be used to direct further excavation.*

E. The extent of any additional excavation will be determined in the field based on the results of the confirmation sampling and field screening.*

F. Waste management will shipped off-site following proper characterization and disposition in accordance with applicable federal and state regulations and guidelines. All personal protective equipment and disposable sampling equipment will be disposed of in proper waste containers.

G. Any waste water generated will be disposed of in proper waste containers (i.e. drums).

H. Appropriate "storm water best management practices" will be employed where necessary to prevent "runon" and runoff" into or from the excavated areas or stockpiles of PCB contaminated soils.

I. All excavation work and sampling will be performed by Empire personel. A NYSDEC approved laboratory will perform the laboratory analysis. Trucking and disposal will be subcontracted to an approved waste management facility.

J. Documentation and reporting will be performed by Empire.

K. It is currently anticipated that the sampling and excavation work will be performed in October 2005.

VI. BACKFILLING AND SITE RESTORATION

A. Empire will obtain clean soil material (i.e. sand and gravel, crushed stone) for backfilling the excavated areas.

B. Topsoil will be used as cover material over backfill material within the excavated lawn and garden areas.

C. Grass areas will be reseeded. Additional reseeding may be completed in the Spring, if necessary.

D. Pavement which may have be saw cut and removed will be replaced.

E. Fence structures which may be removed will be replaced (similar design / type / quality).

F. Garden plants will be replaced.

VII. PCB-CONTAMINATED SOIL REMOVAL SUMMARY REPORT SUBMITTAL

A. Following completion of all field excavation activities, an interim report will be provided to your office and will consist of a site sketch indicating the areas excavated.

B. Following of the receipt of all disposal manifests and laboratory analytical results, Empire will prepare a final PCB-Contaminated Soil Removal Summary Report.

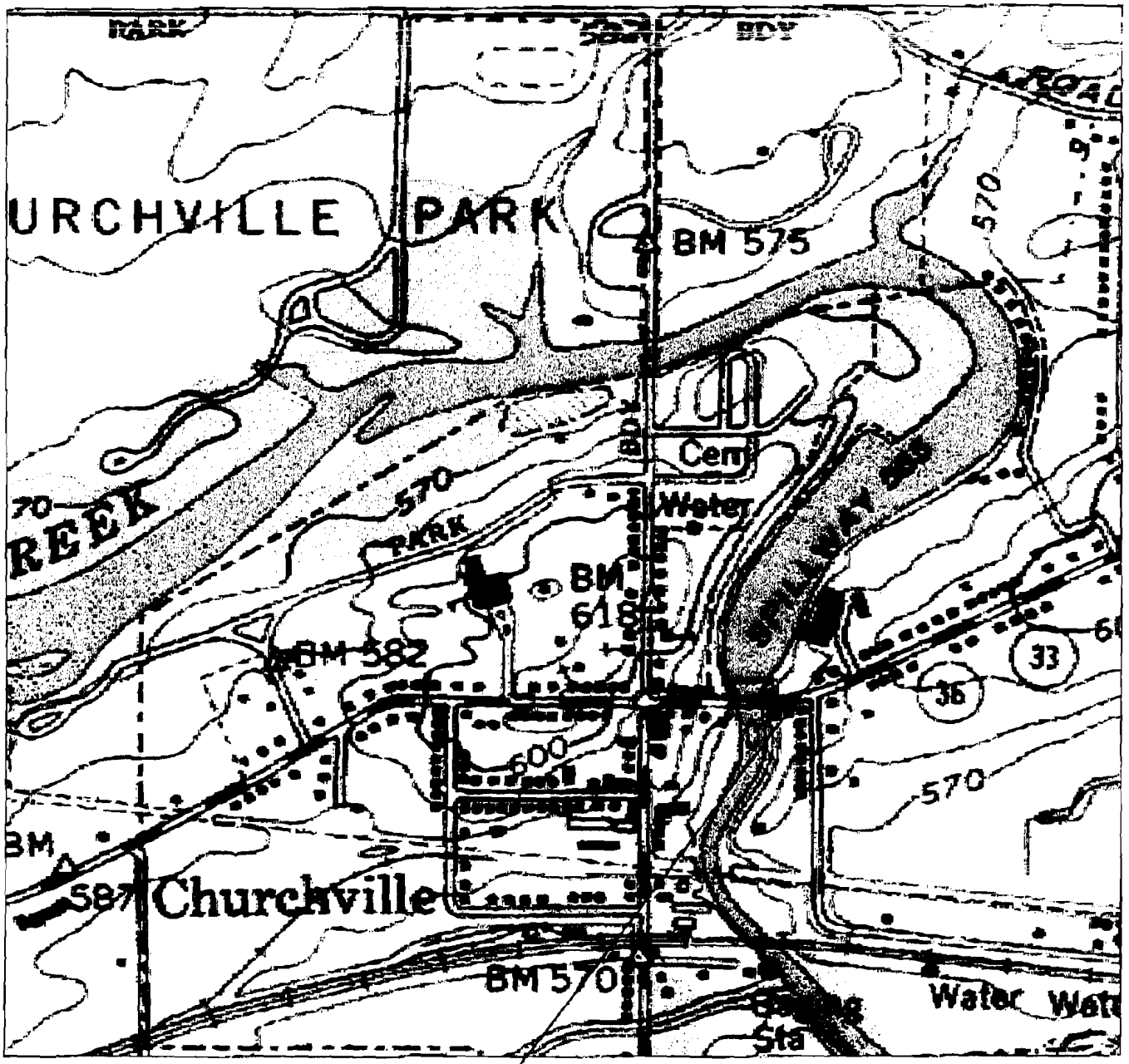
FIGURES

Figure 1-Site Vicinity Map

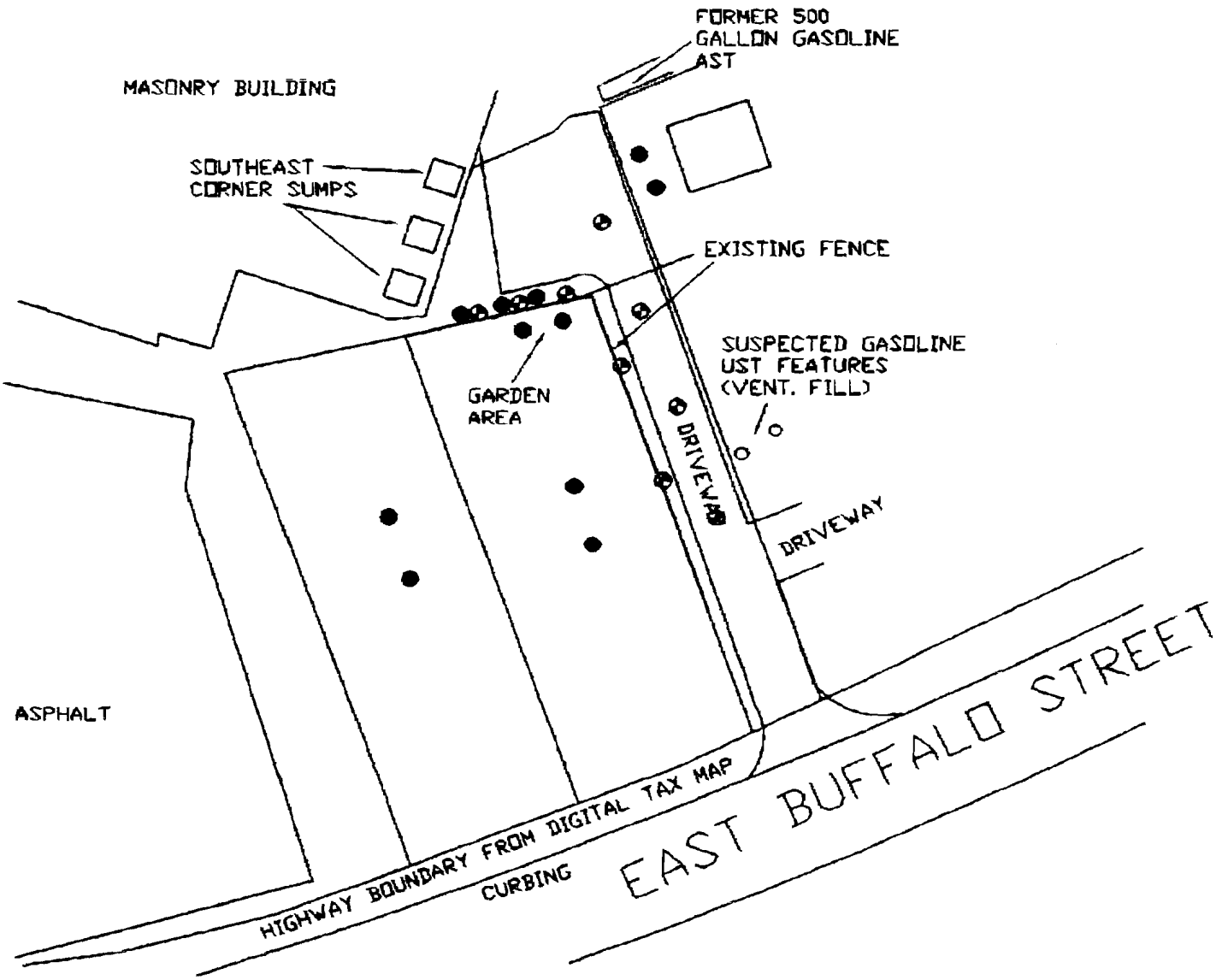
Figure 2-Site Plan/Proposed Sample Locations

FIGURES

Figure 1-Site Location Map
Figure 2-Sampling Plan



EMPIREGEO SERVICES INC a subsidiary of SJB Services, Inc.	SCALE: NTS
	DATE: 10/05
	DRAWN BY: BR
SITE VICINITY MAP	REV'D BY: CG
PCB CONTAMINATED SOIL INVESTIGATION AND REMEDIATION	DWG. FILE: LUSTERCOATE
LUSTER-COATE METALLIZING CORP. PROPERTY 32 EAST BUFFALO STREET VILLAGE OF CHURCHVILLE, MONROE COUNTY, NEW YORK	PROJ. No.: BEV-05
NYSDEC SITE NO.: 828113	FIGURE No.: 1



LEGEND

- ● REPRESENTS APPROXIMATE LOCATION OF SURFACE SOIL SAMPLES (COLLECTED WITH HAND AUGERS, SHOVELS, ETC)
- ⊕ REPRESENTS APPROXIMATE LOCATION OF DIRECT PUSH SAMPLES

EMPIREGEO SERVICES INC
a subsidiary of SJB Services, Inc.

SAMPLING PLAN

PCB CONTAMINATED SOIL INVESTIGATION AND REMEDIATION

LUSTER-COATE METALLIZING CORP. PROPERTY
32 EAST BUFFALO STREET
VILLAGE OF CHURCHVILLE, MONROE COUNTY, NEW YORK

NYSDEC SITE NO.: B28113

SCALE:	NTS
DATE:	10/05
DRAWN BY:	BR
REV'D BY:	CG
DWG. FILE:	LUSTERCOATE
PROJ. No.:	BEV-05
FIGURE No.:	2