HAMPSHIRE

Hampshire Chemical Corp.
228 East Main Street
Waterloo, NY 13165
(315) 539-9221
(315) 539-9627 Fax

November 24, 1999

Mr. Peter Hoffmire
Project Manager
New York State Department of Environmental Conservation
6274 E. Avon-Lima Road
Avon, New York 14414

RE: Evans Chemetics Building 4 Pit Cleaning Project

Dear Peter:

In July-August 1999, Evans Chemetics cleaned and abandoned a below grade pit in Building 4 of its Waterloo Facility. The scope of work performed was described in the *Interim Remedial Action Plan—Building 4 Pit* dated 30 June 1999. The enclosed *Building 4 Pit Cleaning Summary Report* summarizes and documents the results of this work. Three additional copies are enclosed for distribution by you within the Avon office and copies are also being mailed to other members on the State Project Team located in Albany.

Because of concerns regarding potential groundwater contamination resulting from this former pit, the groundwater in this area will be evaluated as part of the upcoming Resource Conservation and Recover Act Facilities Assessment Sampling Visit (RFA-SV). The work plan for this RFA-SV has been submitted for your review under separate cover.

Should you have any questions regarding the *Building 4 Pit Cleaning Summary Report,* or should you require any additional information, please contact either Mr. Ben Baker, Dow Remediation Project Manager at (517) 636-0787,or myself as the Site contact.

Sincerely,

Thomas M. Desiderio

Thomas M. Desiderio
EHS Delivery

cc: N. Rice/ NYSDEC, Avon
M. Conley/ NYSDEE, Albany
L. Rosenmann/NYSDEC, Albany
P. Furdyna / NYSDEC, Albany

DCN 99.802785.01
RIN 802785.2000

Building 4 Pit Cleaning Summary Report

Prepared for:

Evans Chemetics Facility
228 East Main Street
Waterloo, New York 13165

Prepared by:

Radian International
304 West Wackerly Street
Midland, MI 48640-4700

November 1999

RADIAN INTERNATIONAL
A DAMES & MOORE GROUP COMPANY

DCN 99.802785.01
RIN 802785.2000

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1.0 Introduction

Hampshire Chemical Corporation, a subsidiary of The Dow Chemical Company, performed an Interim Remedial Action (IRA) at the former Building 4 pit at the Evans Chemetics Plant in the Village of Waterloo, New York (Figure 1-1). The Building 4 pit was located in the southwest corner of Building 4 (Figure 1-2) and contained a sump that served as the collection point for the floor drains in the building. The pit was approximately 17 feet wide, by 48 feet long, and 10 feet deep at its deepest point (Figure 1-3). The sump area was covered by the concrete floor of the building, and was accessible through an entrance at the eastern end of the pit.

The area was originally open to this depth across the south side of the building, and was larger than indicated in Figure 1-3. Approximately two-thirds of the pit was backfilled and covered with concrete deck at the adjacent floor grade in 1994, with NYSDEC approval, to provide for placement of process equipment. During that effort, certain conditions that might have indicated a release of hazardous materials were noted and reported to the New York State Department of Environmental Conservation (NYSDEC). An investigation of those conditions was completed and submitted. The investigation concluded that soil and groundwater in the immediate vicinity of Building 4 may have been affected by plant operations. The source of the release was suspected to be an above ground tank (4-AV-7) and a below grade washwater collection sump, both located in the pit area. (*Building 4 Investigation Report*, H&A of New York, September 1995).

In early 1999, Hampshire Chemical Corporation made the decision to address the pit area in order to eliminate a potential environmental and safety hazard and to provide space for expansion if a business opportunity occurred. Advance notice was given to NYSDEC because this area had been designated by NYSDEC as an Area of Concern (AOC). To take advantage of a two-week shut down of operations, the majority of the work was planned for early July 1999. In anticipation of this work, Hampshire Chemical Corporation submitted an advance copy of the Interim Remedial Action Plan (IRAP) for Building 4 Pit (Radian, 1999) to NYSDEC on 30 June 1999. The IRAP that was implemented called for all debris to be removed from the pit and internal sump, backfilling of the pit and sump with flowable cement, installation of a floor trench to collect runoff from floor drains in the adjacent area, and placement of a concrete

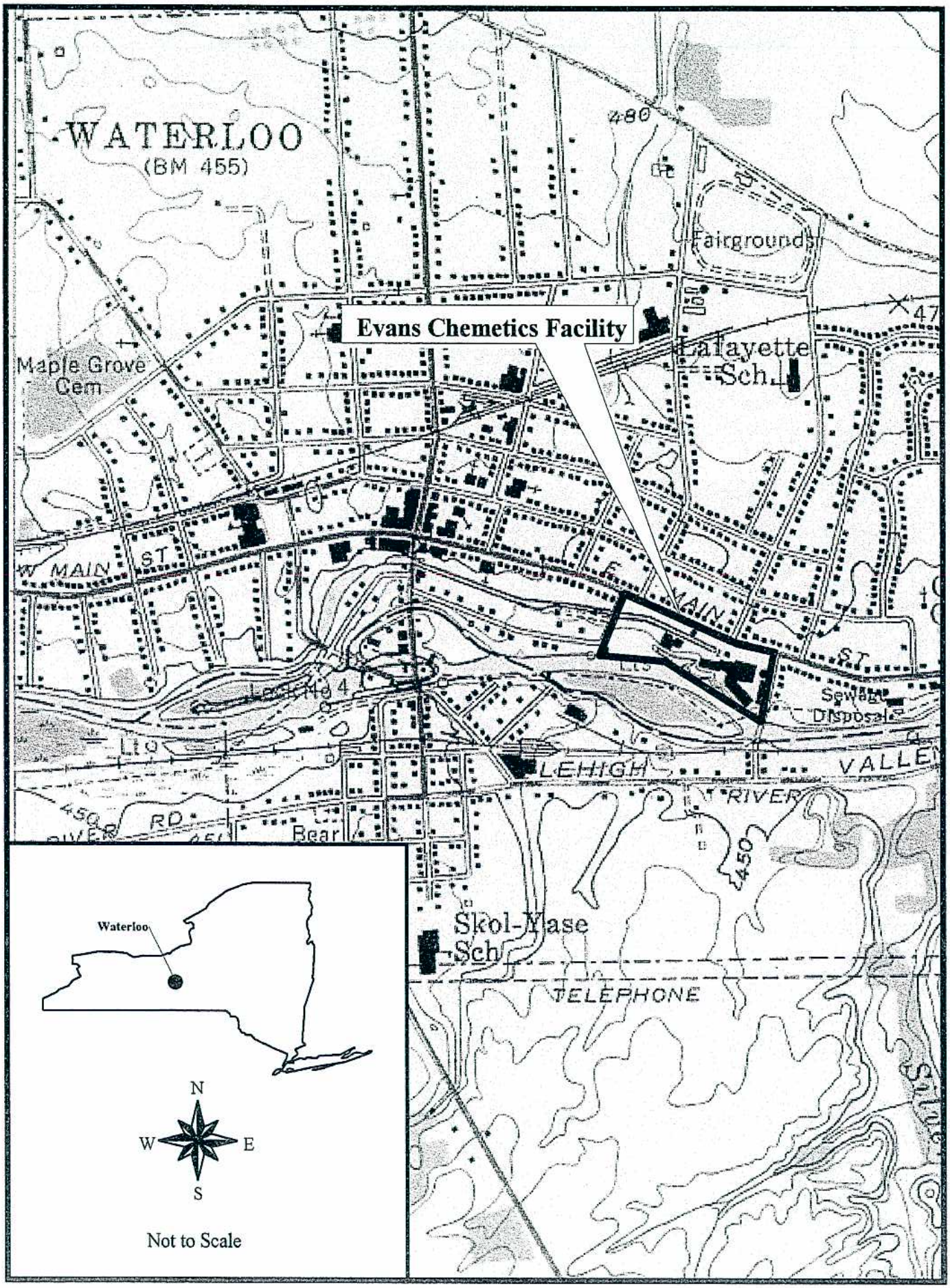

Figure 2-1: Site Location

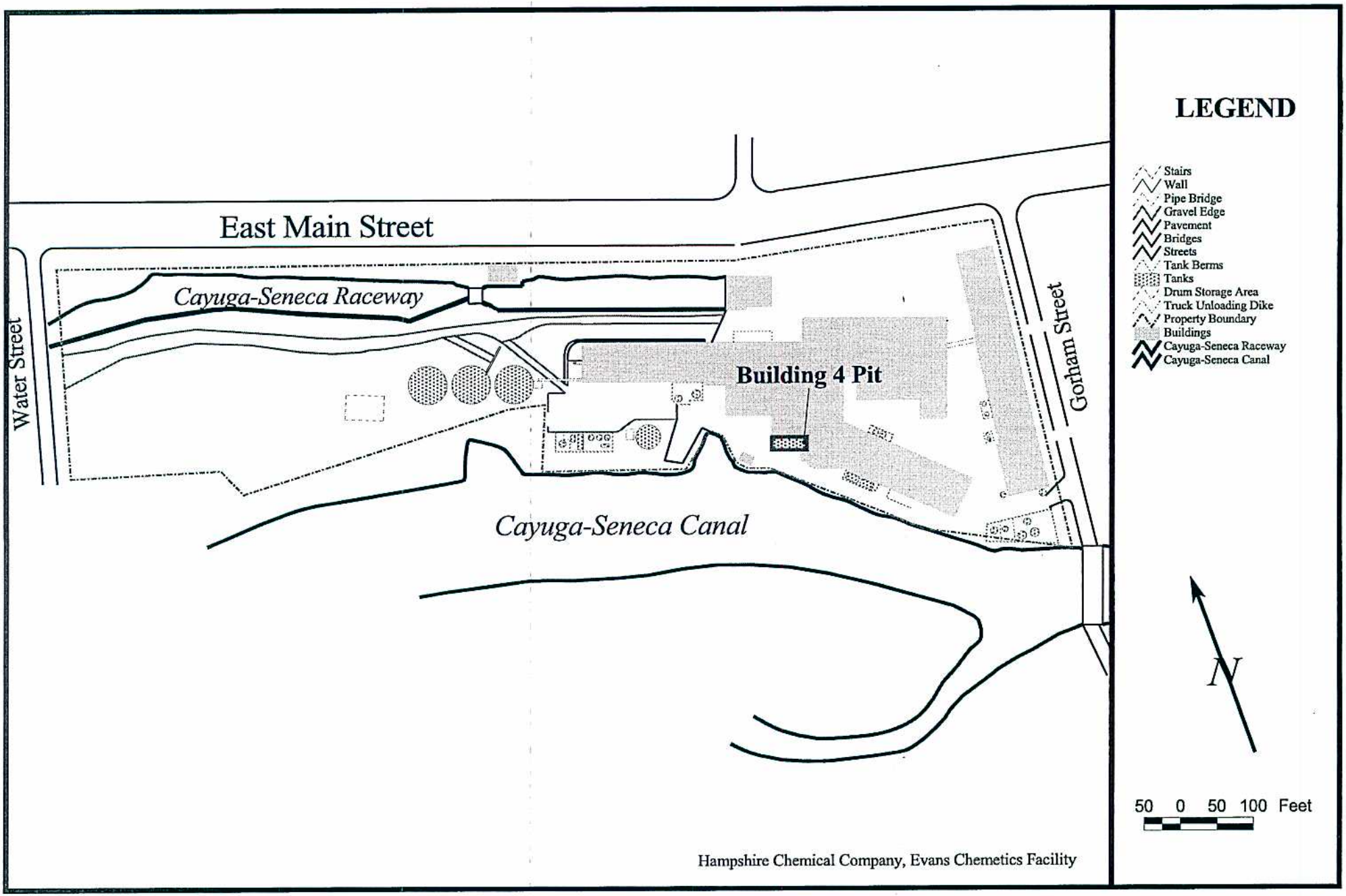

Figure 1-2: Site Map

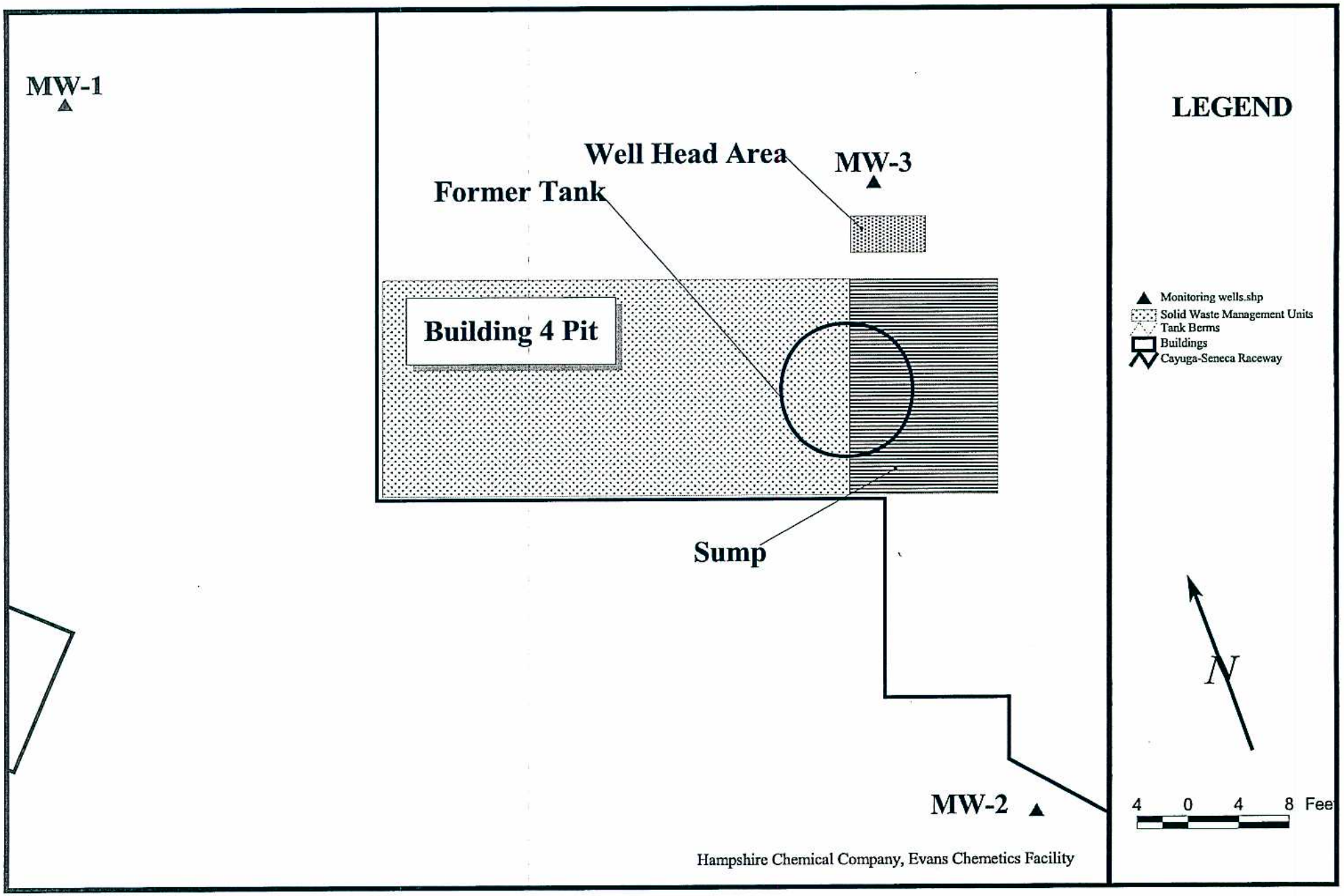

Figure 1-3: Building 4 Pit, Sump, and Wells.

floor above the flowable cement. This work began during the plant shutdown in July and finished in August of 1999. Radian International (Radian), under contract to Hampshire Chemical Corporation, implemented the Interim Remedial Action Plan (IRAP). This report describes the work performed to close the Building 4 Pit.

2.0 Scope of Work Performed

On 15 June, before the initiation of any work, a sample of the sediment in the Building 4 pit was collected and analyzed for volatile (SW 846: 8260) and semivolatile (SW 846: 8270) organics, and metals (SW 846: 6010) using the toxicity characteristic leaching potential. Samples were also analyzed for polychlorinated biphenyls (SW 846: 8080). Results of these analyses are presented in Table 2-1. The raw analytical reports (which misidentify the material as liquid,) are contained in Appendix A. Work began on 6 July 1999, and was completed by 17 August 1999. The procedures indicated in the Interim Remedial Action Plan (Radian, 1999) were followed for all of the work that was performed.

Prior to the start of work, Evans Chemetics personnel pumped all water from the sump to the Evans Chemetics wastewater treatment plant for treatment and discharge. The estimated total amount of liquid removed from the pit was approximately 2000 gallons. This was reported to the NYSDEC in a letter from Tom Desiderio dated 16 July 1999 (See Appendix B for a copy of this correspondence). In addition, Evans Chemetics personnel also moved the above grade tanks that were located over the pit.

Once these tasks were completed, Radian International began removing debris and sediment, and began to power wash the walls and floor of the pit (Photo 1 and 2 in Appendix C). Debris and sediment that had accumulated in the sump was collected with shovels, and loaded into a roll-off box pending characterization and disposal. Material that could not be removed by scraping was removed by pressure washing. Pressure washing was done from west to east to direct the water and sediment toward the sump located at the eastern end of the pit. Water from the pressure washing operation was pumped from this sump into the Evans Chemetics wastewater treatment plant.

Two polypropylene tanks contained in the pit's sump were opened (Photo 3 in Appendix C), pumped out, cut apart, and removed for disposal. All former drain lines draining to the sump were either removed or plugged with "basement water stop". A well formerly used to pump water from the sump in the pit to the wastewater treatment plant was removed from the well head area to the north of the pit (Photo 4 in Appendix C).

Table 2-1. Analytical Results for Sediment from Building 4 Pit.

Constituent	RCRA Toxicity Characteristic Levels (ug/l)	Concentration (ug/l)
Metals (SW 846: 6010)		
Cadmium	1000	40
Chromium	5000	80
Silver	5000	60
Volatile Organics (SW 846: 8260)		
Tetrachloroethene	700	380
Semivolatile Organics (SW 846: 8270)		
Phenanthrene	NA	1600
Fluoranthene	NA	2400
Pyrene	NA	3700
Benzo(a)anthracene	NA	1300
Chrysene	NA	1500
Bis(2-ethylhexyl)phthalate	NA	6200
Benzo(b)fluoranthene	NA	2300
Benzo(k)fluoranthene	NA	840
Benzo(a)pyrene	NA	1400
Indeno(1,2,3-cd)pyrene	NA	830
Benzo(ghi)perylene	NA	900
Polychlorinated Biphenyls (SW 846: 8080)		
Aroclor 1260	NA	41000

The floors and walls of the sump were then thoroughly pressure washed (Photo 5 in Appendix C), and the remaining water and debris were removed from the sump.

A new, 4-inch diameter by 10 foot long PVC well was installed in the pit sump, and the sump was backfilled with 14 tons of gravel. The top of the sump was covered with sheet plastic, and the entire pit was then filled with flowable cement to within approximately 1-2 feet of the floor level of Building 4. After the cement had cured , the remaining roof of the pit was removed using a jackhammer (Photo 6 in Appendix C). The concrete debris was removed for disposal and a fiberglass reinforced plastic collection trench was purchased, placed along the north end of the former pit, and connected to the floor drain collection system for the area (Photos 7 & 8 in Appendix C). The flow from this trench was connected to an existing sump on the north side of Building 4 that was installed when the previous work in this area had been done in 1994. Additional flowable cement was then added to the pit to bring the level up to approximately 6 inches from the existing floor grade of Building 4 (Photo 9 in Appendix C).

Once this pour of flowable concrete fill had cured, steel reinforcing rod and matting were installed over the former pit area (Photo 10 in Appendix C). Fiber reinforced concrete (5000psi) was then added to bring the pit area up to the same level with the rest of the floor in the area (Photo 12 in Appendix C). The floor was smoothed, and allowed to cure for several days before it was washed with muriatic acid, and coated with an epoxy resin. The sump well was then cut down to floor level, and completed with a flush-mounted well cover (Photo 11 in Appendix C).

Sediment removed from the pit were characterized as non-regulated material based on the results of the analysis presented in Table 2-1. This material was sent off-site to the Modern Landfill Facility in Model City, New York for disposal as a non-hazardous waste.

3.0 Conclusions

The removal of the sediment and debris from the Building 4 pit area revealed that the pit was concrete lined, intact, and in good condition. Consequently, there was limited potential for contaminants in the pit to have affected the soil and groundwaater surrounding the pit. Prior to the cleaning and filling of the Building 4 pit, a limited potential existed for the liquids contained in the pit and sump to leach through the bottom, and contact groundwater (which appeared to be immediately at or slightly above the bottom of the sump).

As part of the RCRA Facility Assessment Sampling Visit (RFA-SV) the groundwater in this area will be evaluated. The RFA-SV work plan has also been submitted to the NYSDEC, and will be implemented once their review is complete. Results of this groundwater evaluation will be presented along with other data from the RFA-SV.

4.0 References

A.T. Kearney, 1993, *RCRA Facility Assessment Report, Hampshire Chemical Corporation (formerly W.R. Grace) Waterloo, New York.*

New York State Department of Environmental Conservation, 1994, *Division Technical and Administrative Guidance Memorandum for Determination of Soil Cleanup Objectives and Cleanup Levels.*

New York State Department of Environmental Conservation, 1995, *Draft Module III—Corrective Action Requirements for Solid Waste Management Units and Areas of Concern.*

H & A Geotechnical Engineers and Environmental Consultants, October 1994, *Plan of Action, Building 4 Investigations, Evans Chemetics Facility, Waterloo, New York.*

H & A Geotechnical Engineers and Environmental Consultants, September 1995, *Building 4 Investigation, Hampshire Chemical Corporation, Evans Chemetics Facility, Waterloo, New York.*

Appendix A

Analytical Data

To: Mark Sylvester
301 656-3650
5 pages

From: Wendy Niles
315 437-0255
517 636 1364

DATE: / /

APPROVAL:
QC:

Upstate Laboratories, Inc.
Analysis Results
Report Number: 16799123
Client I.D.: RADIAN INTERNATIONAL

BLDG 4
Pit Analysis

Lab I.D.: 10170
Sampled by:

ID:16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC 1 ALL LOC 1 1605H 06/15/99 G

	PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
	%Ash	83%TS	06/17/99		WC6338
	BTU/lb	<500BTU/lb	06/17/99		WC6324
	Percent Solids	43%	06/16/99		WC6312
TCLP	Arsenic	<0.5mg/l	06/23/99		MB1182
TCLP	Barium	<0.3mg/l	06/23/99		MB1182
TCLP	Cadmium	0.040mg/l	06/23/99		MB1182
TCLP	Chromium	0.08mg/l	06/23/99		MB1182
TCLP	Lead	<0.1mg/l	06/23/99		MB1182
TCLP	Mercury	<0.0004mg/l	06/24/99		MB1189
TCLP	Selenium	<0.5mg/l	06/23/99		MB1182
TCLP	Silver	0.06mg/l	06/23/99		MB1182
	TCL Volatiles by EPA Method 8260				
	Chloromethane	<1200ug/kg dw	06/24/99	01	VM2443
	Bromomethane	<1200ug/kg dw	06/24/99	01	VM2443
	Vinyl Chloride	<780ug/kg dw	06/24/99	01	VM2443
	Chloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Methylene Chloride	<1200ug/kg dw	06/24/99	01	VM2443
	Acetone	<3900ug/kg dw	06/24/99	01	VM2443
	Carbon Disulfide	<1200ug/kg dw	06/24/99	01	VM2443
	1,1-Dichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	1,1-Dichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	trans-1,2-Dichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	cis-1,2-Dichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	Chloroform	<1200ug/kg dw	06/24/99	01	VM2443
	1,2-Dichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	2-Butanone	<3900ug/kg dw	06/24/99	01	VM2443
	1,1,1-Trichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Carbon Tetrachloride	<1200ug/kg dw	06/24/99	01	VM2443
	Bromodichloromethane	<1200ug/kg dw	06/24/99	01	VM2443
	1,2-Dichloropropane	<1200ug/kg dw	06/24/99	01	VM2443
	cis-1,3-Dichloropropene	<1200ug/kg dw	06/24/99	01	VM2443
	Trichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	Dibromochloromethane	<1200ug/kg dw	06/24/99	01	VM2443
	1,1,2-Trichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Benzene	<1200ug/kg dw	06/24/99	01	VM2443
	trans-1,3-Dichloropropene	<1200ug/kg dw	06/24/99	01	VM2443
	Bromoform	<3900ug/kg dw	06/24/99	01	VM2443
	4-Methyl-2-pentanone	<3900ug/kg dw	06/24/99	01	VM2443
	2-Hexanone	<1200ug/kg dw	06/24/99	01	VM2443
	Tetrachloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	1,1,2,2-Tetrachloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Toluene	<1200ug/kg dw	06/24/99	01	VM2443
	Chlorobenzene				

ATE: / /

APPROVAL
QC: Lab I.D.: 10170

Upstate Laboratories, Inc.
nalysis Results
eport Number: 16799123
Client I.D.: RADIAN INTERNATIONAL

Sampled by:

D:16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC 1 ALL LOC 1 1605H 06/15/99 G

PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
Ethylbenzene	<1200ug/kg dw	06/24/99	01	VM2443
Styrene	<1200ug/kg dw	06/24/99	01	VM2443
m-Xylene and p-Xylene	<1200ug/kg dw	06/24/99	01	VM2443
o-Xylene	<1200ug/kg dw	06/24/99	01	VM2443
TCLP Volatile Organic Compounds by 8240				
TCLP Benzene	<0.03mg/l	06/29/99		VM2449
TCLP Carbon Tetrachloride	<0.03mg/l	06/29/99		VM2449
TCLP Chlorobenzene	<0.03mg/l	06/29/99		VM2449
TCLP Chloroform	<0.03mg/l	06/29/99		VM2449
TCLP 1,4-Dichlorobenzene	<0.03mg/l	06/29/99		VM2449
TCLP 1,2-Dichloroethane	<0.03mg/l	06/29/99		VM2449
TCLP 1,1-Dichloroethene	<0.03mg/l	06/29/99		VM2449
TCLP Methyl Ethyl Ketone	<0.10mg/l	06/29/99		VM2449
TCLP Tetrachloroethene	0.38mg/l	06/29/99		VM2449
TCLP Trichloroethene	<0.03mg/l	06/29/99		VM2449
TCLP Vinyl Chloride	<0.02mg/l	06/29/99		VM2449
TCL Semivolatiles by EPA Method 8270				
Phenol	<780ug/kg dw	06/25/99		SA2017
bis(2-Chloroethyl)ether	<780ug/kg dw	06/25/99		SA2017
2-Chlorophenol	<780ug/kg dw	06/25/99		SA2017
1,3-Dichlorobenzene	<780ug/kg dw	06/25/99		SA2017
1,4-Dichlorobenzene	<780ug/kg dw	06/25/99		SA2017
1,2-Dichlorobenzene	<780ug/kg dw	06/25/99		SA2017
2-Methylphenol	<780ug/kg dw	06/25/99		SA2017
2,2'-Oxybis(1-Chloropropane)	<780ug/kg dw	06/25/99		SA2017
4-Methylphenol	<780ug/kg dw	06/25/99		SA2017
n-Nitrosodi-n-propylamine	<780ug/kg dw	06/25/99		SA2017
Hexachloroethane	<780ug/kg dw	06/25/99		SA2017
Nitrobenzene	<780ug/kg dw	06/25/99		SA2017
Isophorone	<780ug/kg dw	06/25/99		SA2017
2-Nitrophenol	<780ug/kg dw	06/25/99		SA2017
2,4-Dimethylphenol	<780ug/kg dw	06/25/99		SA2017
bis(2-Chloroethoxy)methane	<780ug/kg dw	06/25/99		SA2017
2,4-Dichlorophenol	<780ug/kg dw	06/25/99		SA2017
1,2,4-Trichlorobenzene	<780ug/kg dw	06/25/99		SA2017
Naphthalene	<780ug/kg dw	06/25/99		SA2017
4-Chloroaniline	<780ug/kg dw	06/25/99		SA2017
Hexachlorobutadiene	<780ug/kg dw	06/25/99		SA2017
4-Chloro-3-methylphenol	<780ug/kg dw	06/25/99		SA2017
2-Methylnaphthalene	<780ug/kg dw	06/25/99		SA2017
Hexachlorocyclopentadiene	<780ug/kg dw	06/25/99		SA2017
2,4,6-Trichlorophenol	<780ug/kg dw	06/25/99		SA2017

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APPROVAL:
QC: Lab I.D.: 10170

Constate Laboratories, Inc.
Analysis Results
Report Number: 16799123
Client I.D.: RADIAN INTERNATIONAL
Sampled by:

16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC 1 ALL LOC 1 1605H 06/15/99 G

PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
2,4,5-Trichlorophenol	<780ug/kg dw	06/25/99		SA2017
2-Chloronaphthalene	<780ug/kg dw	06/25/99		SA2017
2-Nitroaniline	<3900ug/kg dw	06/25/99		SA2017
Dimethylphthalate	<780ug/kg dw	06/25/99		SA2017
Acenaphthylene	<780ug/kg dw	06/25/99		SA2017
2,6-Dinitrotoluene	<780ug/kg dw	06/25/99		SA2017
3-Nitroaniline	<3900ug/kg dw	06/25/99		SA2017
Acenaphthene	<780ug/kg dw	06/25/99		SA2017
2,4-Dinitrophenol	<3900ug/kg dw	06/25/99		SA2017
4-Nitrophenol	<3900ug/kg dw	06/25/99		SA2017
Dibenzofuran	<780ug/kg dw	06/25/99		SA2017
2,4-Dinitrotoluene	<780ug/kg dw	06/25/99		SA2017
Diethylphthalate	<780ug/kg dw	06/25/99		SA2017
4-Chlorophenylphenylether	<780ug/kg dw	06/25/99		SA2017
Fluorene	<780ug/kg dw	06/25/99		SA2017
4-Nitroaniline	<3900ug/kg dw	06/25/99		SA2017
2-Methyl-4,6-dinitrophenol	<3900ug/kg dw	06/25/99		SA2017
n-Nitrosodiphenylamine	<780ug/kg dw	06/25/99		SA2017
4-Bromophenylphenylether	<780ug/kg dw	06/25/99		SA2017
Hexachlorobenzene	<780ug/kg dw	06/25/99		SA2017
Pentachlorophenol	<1500ug/kg dw	06/25/99		SA2017
Phenanthrene	1600ug/kg dw	06/25/99		SA2017
Anthracene	<780ug/kg dw	06/25/99		SA2017
Carbazole	<780ug/kg dw	06/25/99		SA2017
di-n-butylphthalate	<780ug/kg dw	06/25/99		SA2017
Fluoranthene	2400ug/kg dw	06/25/99		SA2017
Pyrene	3700ug/kg dw	06/25/99		SA2017
Butylbenzylphthalate	<780ug/kg dw	06/25/99		SA2017
3,3'-Dichlorobenzidine	<780ug/kg dw	06/25/99		SA2017
Benzo(a)anthracene	1300ug/kg dw	06/25/99		SA2017
Chrysene	1500ug/kg dw	06/25/99		SA2017
bis(2-Ethylhexyl)phthalate	6200ug/kg dw	06/25/99		SA2017
di-n-octylphthalate	<780ug/kg dw	06/25/99		SA2017
Benzo(b)fluoranthene	2300ug/kg dw	06/25/99		SA2017
Benzo(k)fluoranthene	840ug/kg dw	06/25/99		SA2017
Benzo(a)pyrene	1400ug/kg dw	06/25/99		SA2017
Indeno(1,2,3-cd)pyrene	830ug/kg dw	06/25/99		SA2017
Dibenzo(a,h)anthracene	<780ug/kg dw	06/25/99		SA2017
Benzo(ghi)perylene	900ug/kg dw	06/25/99		SA2017

TCLP Semivolatile Compounds by 8270

TCLP	Cresol, Total	<0.1mg/l	06/25/99	SA2016
TCLP	2,4-Dinitrotoluene	<0.05mg/l	06/25/99	SA2016
TCLP	Hexachlorobenzene	<0.05mg/l	06/25/99	SA2016

DATE: / /

Upstate Laboratories, Inc.
Analysis Results
Report Number: 16799123
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APPROVAL:
QC:
Lab I.D.: 10170
Sampled by:

:16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC 1 ALL LOC 1 1605H 06/15/99 G

	PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
TCLP	Hexachlorobutadiene	<0.05mg/l	06/25/99		SA2016
TCLP	Hoxachloroethane	<0.05mg/l	06/25/99		SA2016
TCLP	Nitrobenzene	<0.05mg/l	06/25/99		SA2016
TCLP	Pentachlorophenol	<0.1mg/l	06/25/99		SA2016
TCLP	Pyridine	<0.05mg/l	06/25/99		SA2016
TCLP	2,4,5-Trichlorophenol	<0.05mg/l	06/25/99		SA2016
TCLP	2,4,6-Trichlorophenol	<0.05mg/l	06/25/99		SA2016
	PCB (Aroclors) by EPA Method 8080				
	Aroclor 1016	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1221	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1232	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1242	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1248	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1254	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1260	41mg/kg dw	06/22/99		PA5049
	Total PCB	41mg/kg dw	06/22/99		PA5049

KEY PAGE

1 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS
2 MATRIX INTERFERENCE
3 PRESENT IN BLANK
4 ANALYSIS NOT PERFORMED BECAUSE OF INSUFFICIENT SAMPLE
5 THE PRESENCE OF OTHER TARGET ANALYTE(S) PRECLUDES LOWER DETECTION LIMITS
6 BLANK CORRECTED
7 HEAD SPACE PRESENT IN SAMPLE
8 QUANTITATION LIMIT IS GREATER THAN THE CALCULATED REGULATORY LEVEL. THE QUANTITATION LIMIT THEREFORE BECOMES THE REGULATORY LEVEL.
9 THE OIL WAS TREATED AS A SOLID AND LEACHED WITH EXTRACTION FLUID
10 ADL(AVERAGE DETECTION LIMITS)
11 PQL(PRACTICAL QUANTITATION LIMITS)
12 SAMPLE ANALYZED OVER HOLDING TIME
13 DISSOLVED VALUE MAY BE HIGHER THAN TOTAL DUE TO CONTAMINATION FROM THE FILTERING PROCEDURE
14 SAMPLED BY ULI
15 DISSOLVED VALUE MAY BE HIGHER THAN TOTAL; HOWEVER, THE VALUES ARE WITHIN EXPERIMENTAL ERROR
16 AN INHIBITORY FACTOR WAS OBSERVED IN THIS ANALYSIS
17 PARAMETER NOT ANALYZED WITHIN 15 MINUTES OF SAMPLING
18 THE SERIAL DILUTION OF THIS SAMPLE SUGGESTS A POSSIBLE PHYSICAL AND/OR CHEMICAL INTERFERENT IN THIS DETERMINATION. THE DATA MAY BE BIASED EITHER HIGH OR LOW.
19 CALCULATION BASED ON DRY WEIGHT
20 INDICATES AN ESTIMATED VALUE, DETECTED BUT BELOW THE PRACTICAL QUANTITATION LIMITS
21 UG/KG AS REC.D / UG/KG DRY WT
22 MG/KG AS REC.D / MG/KG DRY WT
23 INSUFFICIENT SAMPLE PRECLUDES LOWER DETECTION LIMITS
24 SAMPLE DILUTED/BLANK CORRECTED
25 ND(NON-DETECTED)
26 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/BLANK CORRECTED
27 SPIKE RECOVERY ABNORMALLY HIGH/LOW DUE TO MATRIX INTERFERENCE
28 POST-DIGESTION SPIKE FOR FURNACE AA ANALYSIS IS OUTSIDE OF THE CONTROL LIMITS (85-115%); HOWEVER, THE SAMPLE CONCENTRATION IS BELOW THE PQL
29 ANALYZED BY METHOD OF STANDARD ADDITIONS
30 METHOD PERFORMANCE STUDY HAS NOT BEEN COMPLETED/ND(NON-DETECTED)
31 FIELD MEASURED PARAMETER TAKEN BY CLIENT
32 TARGET ANALYTE IS BIODEGRADED AND/OR ENVIRONMENTALLY WEATHERED
33 NON-POTABLE WATER SOURCE
34 VOLATILE ASP CODES

(B) POSSIBLE/PROBABLE BLANK CONTAMINATION (D) ALL COMPOUNDS IDENTIFIED AT A SECONDARY DILUTION FACTOR (J) ESTIMATED VALUE
35 THE HYDROCARBONS DETECTED IN THE SAMPLE DID NOT CROSS-MATCH WITH COMMON PETROLEUM DISTILLATES
36 MATRIX INTERFERENCE CAUSING SPIKES TO RESULT IN LESS THAN 50.0% RECOVERY
37 MILLIGRAMS PER LITER (MG/L) / POUNDS (LBS) PER DAY
38 MILLIGRAMS PER LITER (MG/L) OF RESIDUAL CHLORINE (CL2) / POUNDS (LBS) PER DAY OF CL2
39 MICROGRAMS PER LITER (UG/L) / POUNDS (LBS) PER DAY
40 MILLIGRAMS PER LITER (MG/L) LINEAR ALKYL SULFONATE (LAS) / POUNDS (LBS) PER DAY LAS
41 RESULTS ARE REPORTED ON AN AS REC.D BASIS
42 THE SAMPLE WAS ANALYZED ON A TOTAL BASIS; THE TEST RESULT CAN BE COMPARED TO THE TCLP REGULATORY CRITERIA BY DIVIDING THE TEST RESULT BY 20, CREATING A THEORETICAL TCLP VALUE
43 METAL BY CONCENTRATION PROCEDURE
44 POSSIBLE CONTAMINATION FROM FIELD/LABORATORY

Appendix B

Correspondence

HAMPSHIRE

Hampshire Chemical Corp.
228 East Main Street
Waterloo, NY 13165
(315) 539-9221
(315) 539-9627 Fax

July 16, 1999

Angus Eaton
NYS Department of Environmental Conservation
Division of Water Permits, Room 314
50 Wolf Road
Albany, NY 12233 – 3505

RE: Evans Chemetics Building 4 Pit Cleaning Project
SPDES Permit Number NY – 0001406
NYSDEC ID 8-4538-00003/00019
Hampshire Chemical Corp. / Evans Chemetics
Village of Waterloo, Seneca County

Dear Angus:

Evans Chemetics is currently cleaning a below grade area in the facility referred to as the Building 4 pit. NYSDEC has received the *Interim Remedial Action Plan – Building 4 Pit*, dated June 30, 1999 that describes the project in more detail. As part of the cleanup project, some of the ground water from the pit was transferred to the facility wastewater treatment plant, then treated and discharged through the current facility SPDES system.

Attached is a table listing the dates water was pumped out of the building 4 pit as part of this remediation project by the contractor, along with the approximate volumes. Note that the majority of the wastewater was sucked into a vacuum truck for off-site disposal at Industrial Recycling in Tonawanda, NY with ultimate disposal of the stabilized material at Modern Landfill in Lewiston, NY. At the beginning of this cleanup project, a sample of the sediments was sent out for analysis. We assumed the concentration of the constituents in the wastewater would be no greater than the concentration detected in the sediments. Attached are the analytical results for this sample.

Please contact me at (315) 539-9221, ext.122 if you need any additional information.

Sincerely,

Steven R Brusso
Technical Leader

CC: Nancy Rice / NYSDEC Region 8
Peter Hoffmire / NYSDEC Region 8
Ben Baker / Dow Remediation
Tom Desiderio / Evans Chemetics

Estimated Building 4 Pit Wastewater Volumes and Destination

DATE	GALLONS WATER	WATER DESTINATION
7/1/99	500	Evans wastewater treatment plant
7/10/99	100	Evans wastewater treatment plant
7/11/99	50	Evans wastewater treatment plant
7/12/99	1000	Vacuum truck for off-site disposal
7/13/99	150	Evans wastewater treatment plant
7/19/99 *	200 ?	Evans wastewater treatment plant

* May require one additional site dewatering prior to final closure

DATE: / /

APPROVAL:
QC:

state Laboratories, Inc.
alysis Results
Report Number: 16799123
Client I.D.: RADIAN INTERNATIONAL

Lab I.D.: 10170
Sampled by:

D:16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC I ALL LOC I 1605H 06/15/99 G

	PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
	%Ash	83%TS	06/17/99		WC6338
	BTU/lb	<500BTU/lb	06/17/99		WC6324
	Percent Solids	43%	06/16/99		WC6312
TCLP	Arsenic	<0.5mg/l	06/23/99		MB1182
TCLP	Barium	<0.3mg/l	06/23/99		MB1182
TCLP	Cadmium	0.040mg/l	06/23/99		MB1182
TCLP	Chromium	0.08mg/l	06/23/99		MB1182
TCLP	Lead	<0.1mg/l	06/23/99		MB1182
TCLP	Mercury	<0.0004mg/l	06/24/99		MB1189
TCLP	Selenium	<0.5mg/l	06/23/99		MB1182
TCLP	Silver	0.06mg/l	06/23/99		MB1182
	TCL Volatiles by EPA Method 8260				
	Chloromethane	<1200ug/kg dw	06/24/99	01	VM2443
	Bromomethane	<1200ug/kg dw	06/24/99	01	VM2443
	Vinyl Chloride	<780ug/kg dw	06/24/99	01	VM2443
	Chloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Methylene Chloride	<1200ug/kg dw	06/24/99	01	VM2443
	Acetone	<3900ug/kg dw	06/24/99	01	VM2443
	Carbon Disulfide	<1200ug/kg dw	06/24/99	01	VM2443
	1,1-Dichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	1,1-Dichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	trans-1,2-Dichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	cis-1,2-Dichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	Chloroform	<1200ug/kg dw	06/24/99	01	VM2443
	1,2-Dichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	2-Butanone	<3900ug/kg dw	06/24/99	01	VM2443
	1,1,1-Trichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Carbon Tetrachloride	<1200ug/kg dw	06/24/99	01	VM2443
	Bromodichloromethane	<1200ug/kg dw	06/24/99	01	VM2443
	1,2-Dichloropropane	<1200ug/kg dw	06/24/99	01	VM2443
	cis-1,3-Dichloropropene	<1200ug/kg dw	06/24/99	01	VM2443
	Trichloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	Dibromochloromethane	<1200ug/kg dw	06/24/99	01	VM2443
	1,1,2-Trichloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Benzene	<1200ug/kg dw	06/24/99	01	VM2443
	trans-1,3-Dichloropropene	<1200ug/kg dw	06/24/99	01	VM2443
	Bromoform	<1200ug/kg dw	06/24/99	01	VM2443
	4-Methyl-2-pentanone	<3900ug/kg dw	06/24/99	01	VM2443
	2-Hexanone	<3900ug/kg dw	06/24/99	01	VM2443
	Tetrachloroethene	<1200ug/kg dw	06/24/99	01	VM2443
	1,1,2,2-Tetrachloroethane	<1200ug/kg dw	06/24/99	01	VM2443
	Toluene	<1200ug/kg dw	06/24/99	01	VM2443
	Chlorobenzene	<1200ug/kg dw	06/24/99	01	VM2443

I TE: / /

Upstate Laboratories, Inc.
; alysis Results
l port Number: 16799123
Client I.D.: RADIAN INTERNATIONAL

APPROVAL
QC: Lab I.D.: 10170
Sampled by:

1:16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC 1 ALL LOC 1 1605H 06/15/99 G

	PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
	Ethylbenzene	<1200ug/kg dw	06/24/99	01	VM2443
	Styrene	<1200ug/kg dw	06/24/99	01	VM2443
	m-Xylene and p-Xylene	<1200ug/kg dw	06/24/99	01	VM2443
	o-Xylene	<1200ug/kg dw	06/24/99	01	VM2443
	TCLP Volatile Organic Compounds by 8240				
TCLP	Benzene	<0.03mg/l	06/29/99		VM2449
TCLP	Carbon Tetrachloride	<0.03mg/l	06/29/99		VM2449
TCLP	Chlorobenzene	<0.03mg/l	06/29/99		VM2449
TCLP	Chloroform	<0.03mg/l	06/29/99		VM2449
TCLP	1,4-Dichlorobenzene	<0.03mg/l	06/29/99		VM2449
TCLP	1,2-Dichloroethane	<0.03mg/l	06/29/99		VM2449
TCLP	1,1-Dichloroethene	<0.03mg/l	06/29/99		VM2449
TCLP	Methyl Ethyl Ketone	<0.10mg/l	06/29/99		VM2449
TCLP	Tetrachloroethene	0.38mg/l	06/29/99		VM2449
TCLP	Trichloroethene	<0.03mg/l	06/29/99		VM2449
TCLP	Vinyl Chloride	<0.02mg/l	06/29/99		VM2449
	TCL Semivolatiles by EPA Method 8270				
	Phenol	<780ug/kg dw	06/25/99		SA2017
	bis(2-Chloroethyl)ether	<780ug/kg dw	06/25/99		SA2017
	2-Chlorophenol	<780ug/kg dw	06/25/99		SA2017
	1,3-Dichlorobenzene	<780ug/kg dw	06/25/99		SA2017
	1,4-Dichlorobenzene	<780ug/kg dw	06/25/99		SA2017
	1,2-Dichlorobenzene	<780ug/kg dw	06/25/99		SA2017
	2-Methylphenol	<780ug/kg dw	06/25/99		SA2017
	2,2'-Oxybis(1-Chloropropane)	<780ug/kg dw	06/25/99		SA2017
	4-Methylphenol	<780ug/kg dw	06/25/99		SA2017
	n-Nitrosodi-n-propylamine	<780ug/kg dw	06/25/99		SA2017
	Hexachloroethane	<780ug/kg dw	06/25/99		SA2017
	Nitrobenzene	<780ug/kg dw	06/25/99		SA2017
	Isophorone	<780ug/kg dw	06/25/99		SA2017
	2-Nitrophenol	<780ug/kg dw	06/25/99		SA2017
	2,4-Dimethylphenol	<780ug/kg dw	06/25/99		SA2017
	bis(2-Chloroethoxy)methane	<780ug/kg dw	06/25/99		SA2017
	2,4-Dichlorophenol	<780ug/kg dw	06/25/99		SA2017
	1,2,4-Trichlorobenzene	<780ug/kg dw	06/25/99		SA2017
	Naphthalene	<780ug/kg dw	06/25/99		SA2017
	4-Chloroaniline	<780ug/kg dw	06/25/99		SA2017
	Hexachlorobutadiene	<780ug/kg dw	06/25/99		SA2017
	4-Chloro-3-methylphenol	<780ug/kg dw	06/25/99		SA2017
	2-Methylnaphthalene	<780ug/kg dw	06/25/99		SA2017
	Hexachlorocyclopentadiene	<780ug/kg dw	06/25/99		SA2017
	2,4,6-Trichlorophenol	<780ug/kg dw	06/25/99		SA2017

D :E: / /

APPROVAL
QC:_ Lab I.D.: 10170

U-state Laboratories, Inc.
A lysis Results
R-port Number: 16799123
Client I.D.: RADIAN INTERNATIONAL
Sampled by:

I :16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC I ALL LOC I 160SH 06/15/99 G

PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
2,4,5-Trichlorophenol	<780ug/kg dw	06/25/99		SA2017
2-Chloronaphthalene	<780ug/kg dw	06/25/99		SA2017
2-Nitroaniline	<3900ug/kg dw	06/25/99		SA2017
Dimethylphthalate	<780ug/kg dw	06/25/99		SA2017
Acenaphthylene	<780ug/kg dw	06/25/99		SA2017
2,6-Dinitrotoluene	<780ug/kg dw	06/25/99		SA2017
3-Nitroaniline	<3900ug/kg dw	06/25/99		SA2017
Acenaphthene	<780ug/kg dw	06/25/99		SA2017
2,4-Dinitrophenol	<3900ug/kg dw	06/25/99		SA2017
4-Nitrophenol	<3900ug/kg dw	06/25/99		SA2017
Dibenzofuran	<780ug/kg dw	06/25/99		SA2017
2,4-Dinitrotoluene	<780ug/kg dw	06/25/99		SA2017
Diethylphthalate	<780ug/kg dw	06/25/99		SA2017
4-Chlorophenylphenylether	<780ug/kg dw	06/25/99		SA2017
Fluorene	<780ug/kg dw	06/25/99		SA2017
4-Nitroaniline	<3900ug/kg dw	06/25/99		SA2017
2-Methyl-4,6-dinitrophenol	<3900ug/kg dw	06/25/99		SA2017
n-Nitrosodiphenylamine	<780ug/kg dw	06/25/99		SA2017
4-Bromophenylphenylether	<780ug/kg dw	06/25/99		SA2017
Hexachlorobenzene	<780ug/kg dw	06/25/99		SA2017
Pentachlorophenol	<1500ug/kg dw	06/25/99		SA2017
Phenanthrene	1600ug/kg dw	06/25/99		SA2017
Anthracene	<780ug/kg dw	06/25/99		SA2017
Carbazole	<780ug/kg dw	06/25/99		SA2017
di-n-butylphthalate	<780ug/kg dw	06/25/99		SA2017
Fluoranthene	2400ug/kg dw	06/25/99		SA2017
Pyrene	3700ug/kg dw	06/25/99		SA2017
Butylbenzylphthalate	<780ug/kg dw	06/25/99		SA2017
3,3'-Dichlorobenzidine	<780ug/kg dw	06/25/99		SA2017
Benzo(a)anthracene	1300ug/kg dw	06/25/99		SA2017
Chrysene	1500ug/kg dw	06/25/99		SA2017
bis(2-Ethylhexyl)phthalate	6200ug/kg dw	06/25/99		SA2017
di-n-octylphthalate	<780ug/kg dw	06/25/99		SA2017
Benzo(b)fluoranthene	2300ug/kg dw	06/25/99		SA2017
Benzo(k)fluoranthene	840ug/kg dw	06/25/99		SA2017
Benzo(a)pyrene	1400ug/kg dw	06/25/99		SA2017
Indeno(1,2,3-cd)pyrene	830ug/kg dw	06/25/99		SA2017
Dibenzo(a,h)anthracene	<780ug/kg dw	06/25/99		SA2017
Benzo(ghi)perylene	900ug/kg dw	06/25/99		SA2017

TCLP Semivolatile Compounds by 8270

TCLP	Cresol, Total	<0.1mg/l	06/25/99	SA2016
TCLP	2,4-Dinitrotoluene	<0.05mg/l	06/25/99	SA2016
TCLP	Hexachlorobenzene	<0.05mg/l	06/25/99	SA2016

DATE: / /

Spectra Laboratories, Inc.
Analysis Results
Report Number: 16799123
Client I.D.: RADIAN INTERNATIONAL

APPROVAL:
QC:
Lab I.D.: 10170
Sampled by:

ID 16799123 Mat:Liquid DOW/EVANS CHEMETICS LOC 1 ALL LOC 1 1605H 06/15/99 G

	PARAMETERS	RESULTS	DATE ANAL.	KEY	FILE#
TCLP	Hexachlorobutadiene	<0.05mg/l	06/25/99		SA2016
TCLP	Hexachloroethane	<0.05mg/l	06/25/99		SA2016
TCLP	Nitrobenzene	<0.05mg/l	06/25/99		SA2016
TCLP	Pentachlorophenol	<0.1mg/l	06/25/99		SA2016
TCLP	Pyridine	<0.05mg/l	06/25/99		SA2016
TCLP	2,4,5-Trichlorophenol	<0.05mg/l	06/25/99		SA2016
TCLP	2,4,6-Trichlorophenol	<0.05mg/l	06/25/99		SA2016
	PCB (Aroclors) by EPA Method 8080				
	Aroclor 1016	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1221	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1232	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1242	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1248	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1254	<2mg/kg dw	06/22/99	05	PA5049
	Aroclor 1260	41mg/kg dw	06/22/99		PA5049
	Total PCB	41mg/kg dw	06/22/99		PA5049

KEY PAGE

1 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS
2 MATRIX INTERFERENCE
3 PRESENT IN BLANK
4 ANALYSIS NOT PERFORMED BECAUSE OF INSUFFICIENT SAMPLE
5 THE PRESENCE OF OTHER TARGET ANALYTE(S) PRECLUDES LOWER DETECTION LIMITS
6 BLANK CORRECTED
7 HEAD SPACE PRESENT IN SAMPLE
8 QUANTITATION LIMIT IS GREATER THAN THE CALCULATED REGULATORY LEVEL. THE QUANTITATION LIMIT THEREFORE BECOMES THE REGULATORY LEVEL.
9 THE OIL WAS TREATED AS A SOLID AND LEACHED WITH EXTRACTION FLUID
10 ADL(AVERAGE DETECTION LIMITS)
11 PQL(PRACTICAL QUANTITATION LIMITS)
12 SAMPLE ANALYZED OVER HOLDING TIME
13 DISSOLVED VALUE MAY BE HIGHER THAN TOTAL DUE TO CONTAMINATION FROM THE FILTERING PROCEDURE
14 SAMPLED BY ULI
15 DISSOLVED VALUE MAY BE HIGHER THAN TOTAL; HOWEVER, THE VALUES ARE WITHIN EXPERIMENTAL ERROR.
16 AN INHIBITORY FACTOR WAS OBSERVED IN THIS ANALYSIS
17 PARAMETER NOT ANALYZED WITHIN 15 MINUTES OF SAMPLING
18 THE SERIAL DILUTION OF THIS SAMPLE SUGGESTS A POSSIBLE PHYSICAL AND/OR CHEMICAL INTERFERENT IN THIS DETERMINATION. THE DATA MAY BE BIASED EITHER HIGH OR LOW.
19 CALCULATION BASED ON DRY WEIGHT
20 INDICATES AN ESTIMATED VALUE, DETECTED BUT BELOW THE PRACTICAL QUANTITATION LIMITS
21 UG/KG AS REC.D / UG/KG DRY WT
22 MG/KG AS REC.D / MG/KG DRY WT
23 INSUFFICIENT SAMPLE PRECLUDES LOWER DETECTION LIMITS
24 SAMPLE DILUTED/BLANK CORRECTED
25 ND(NON-DETECTED)
26 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/BLANK CORRECTED
27 SPIKE RECOVERY ABNORMALLY HIGH/LOW DUE TO MATRIX INTERFERENCE
28 POST-DIGESTION SPIKE FOR FURNACE AA ANALYSIS IS OUTSIDE OF THE CONTROL LIMITS (85-115%); HOWEVER, THE SAMPLE CONCENTRATION IS BELOW THE PQL
29 ANALYZED BY METHOD OF STANDARD ADDITIONS
30 METHOD PERFORMANCE STUDY HAS NOT BEEN COMPLETED/ND(NON-DETECTED)
31 FIELD MEASURED PARAMETER TAKEN BY CLIENT
32 TARGET ANALYTE IS BIODEGRADED AND/OR ENVIRONMENTALLY WEATHERED
33 NON-POTABLE WATER SOURCE
34 VOLATILE ASP CODES

(B)POSSIBLE/PROBABLE BLANK CONTAMINATION (D)ALL COMPOUNDS IDENTIFIED AT A SECONDARY DILUTION FACTOR (J)ESTIMATED VALUE

35 THE HYDROCARBONS DETECTED IN THE SAMPLE DID NOT CROSS-MATCH WITH COMMON PETROLEUM DISTILLATES
36 MATRIX INTERFERENCE CAUSING SPIKES TO RESULT IN LESS THAN 50.0% RECOVERY
37 MILLIGRAMS PER LITER (MG/L) / POUNDS (LBS) PER DAY
38 MILLIGRAMS PER LITER (MG/L) OF RESIDUAL CHLORINE (CL2) / POUNDS (LBS) PER DAY OF CL2
39 MICROGRAMS PER LITER (UG/L) / POUNDS (LBS) PER DAY
40 MILLIGRAMS PER LITER (MG/L) LINEAR ALKYL SULFONATE (LAS) / POUNDS (LBS) PER DAY LAS
41 RESULTS ARE REPORTED ON AN AS REC.D BASIS
42 THE SAMPLE WAS ANALYZED ON A TOTAL BASIS; THE TEST RESULT CAN BE COMPARED TO THE TCLP REGULATORY CRITERIA BY DIVIDING THE TEST RESULT BY 20, CREATING A THEORETICAL TCLP VALUE
43 METAL BY CONCENTRATION PROCEDURE
44 POSSIBLE CONTAMINATION FROM FIELD/LABORATORY

Appendix C

Photographs

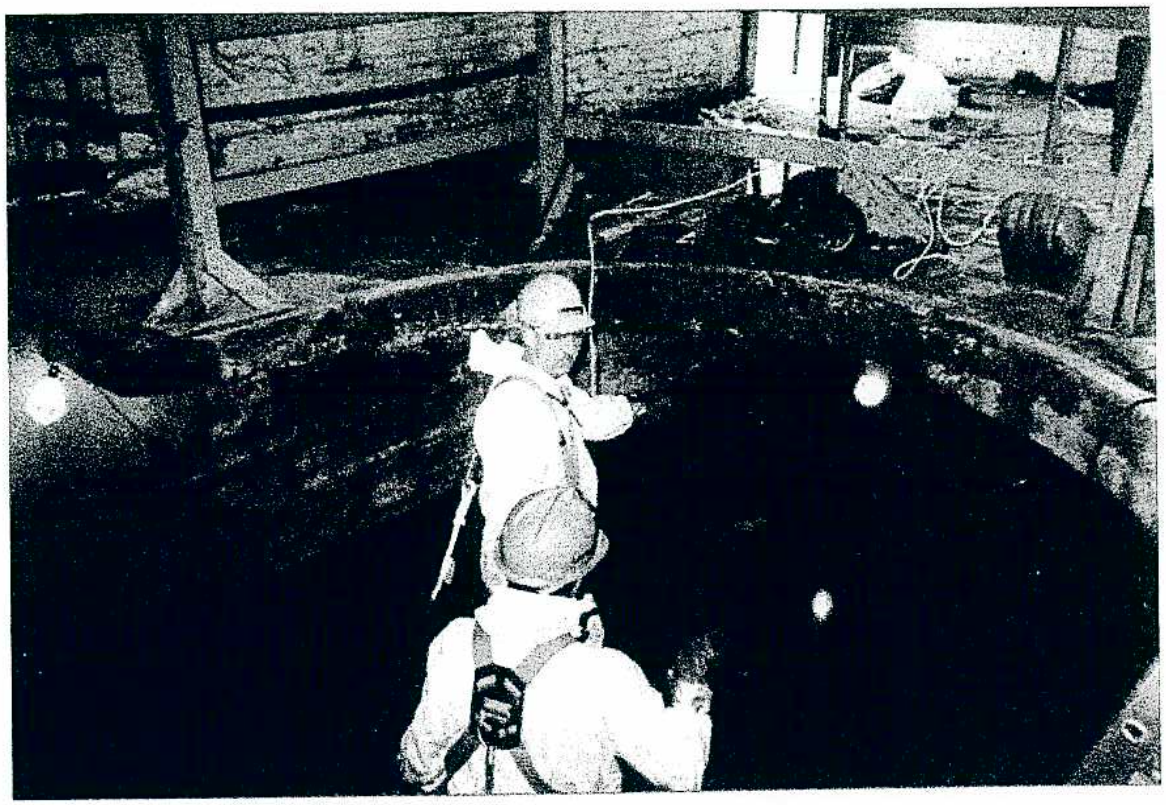

Photo 1: View to west, into opening of Building 4 Pit.

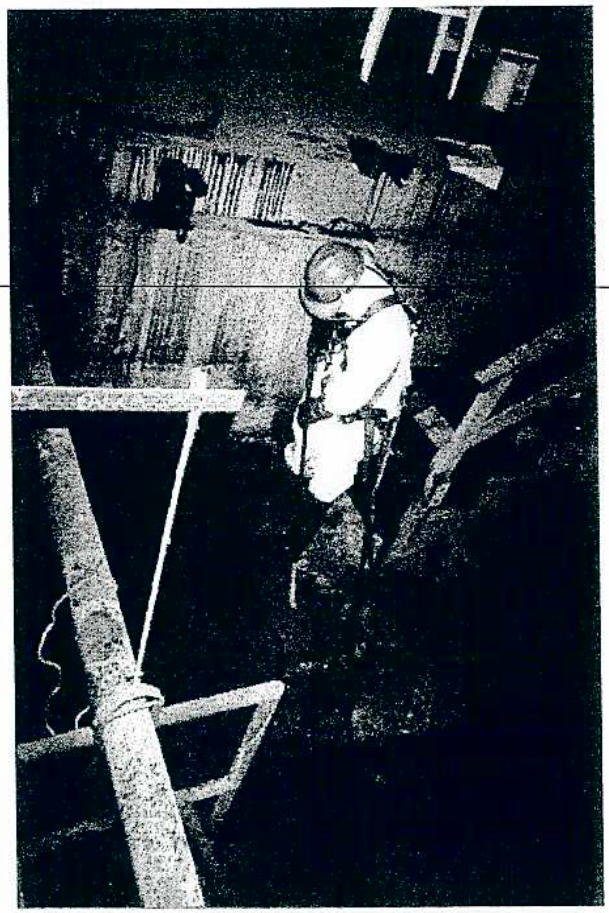

Photo 2: Pressure Washing. View to North.

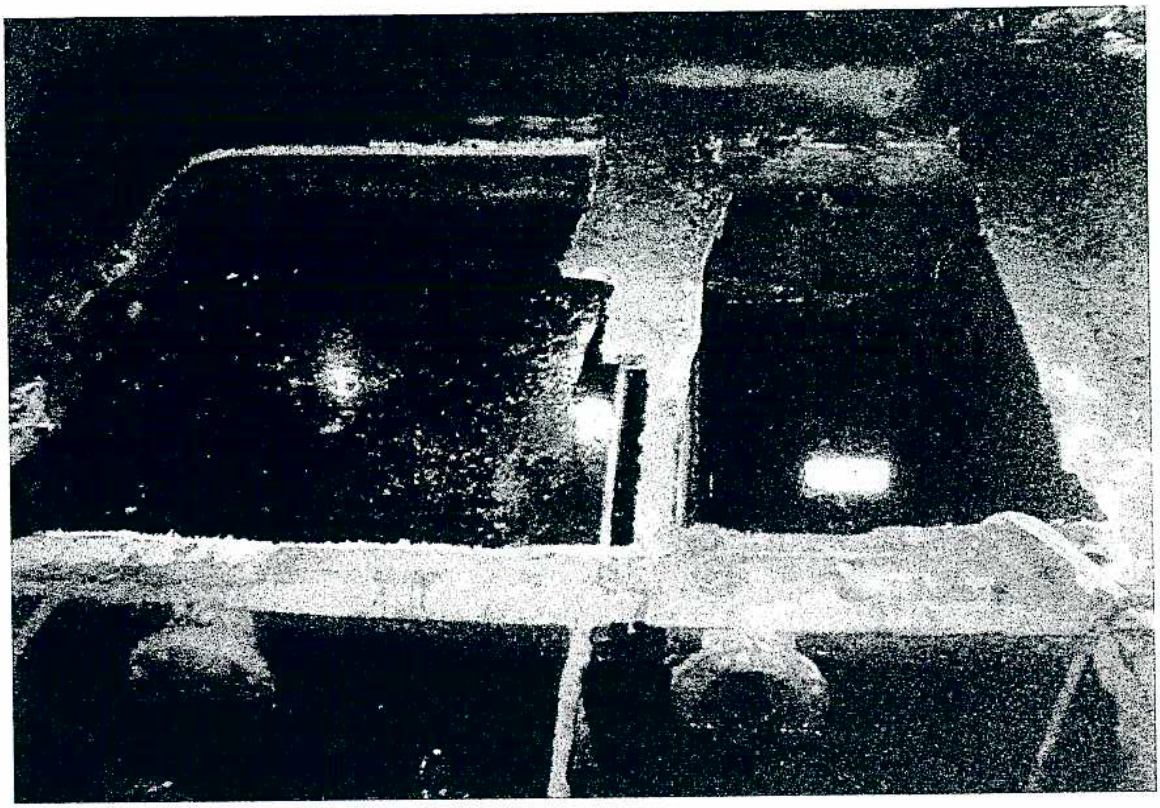

Photo 3: View of opened polyethylene tank from Building 4 Pit.

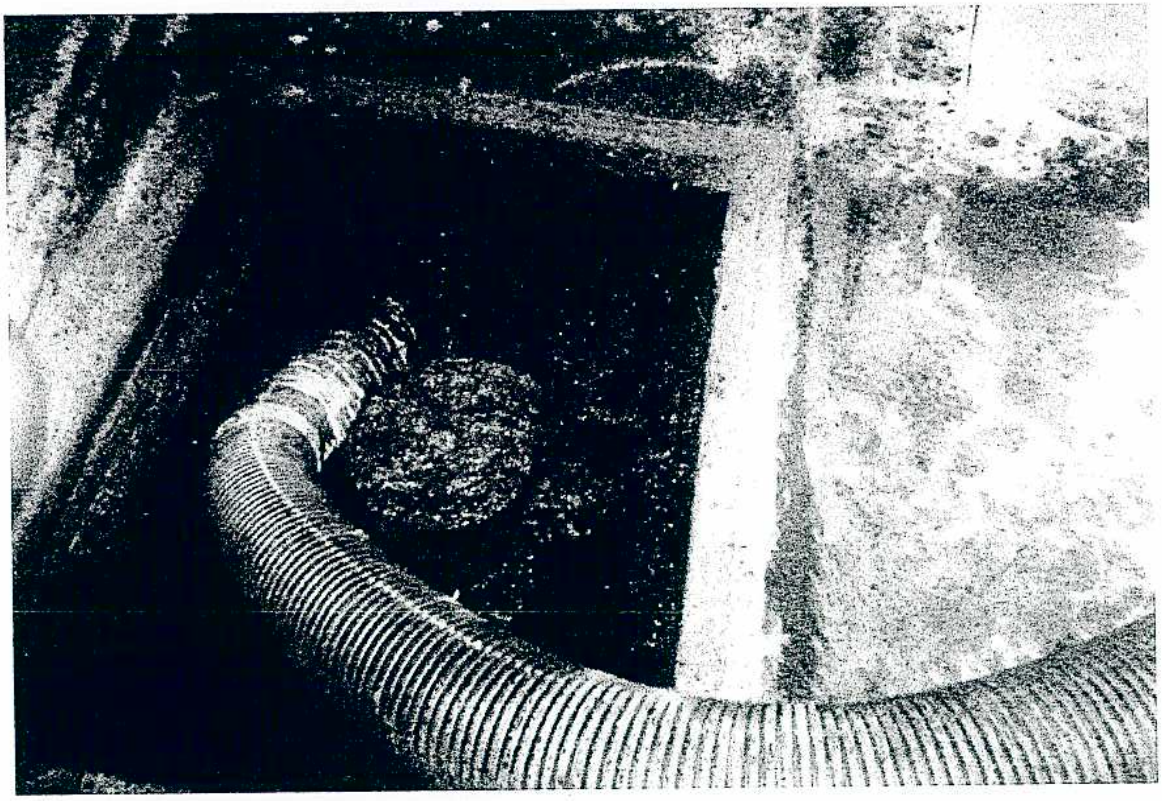

Photo 4: Pumping water and sediment from well head area in Building 4 Pit.

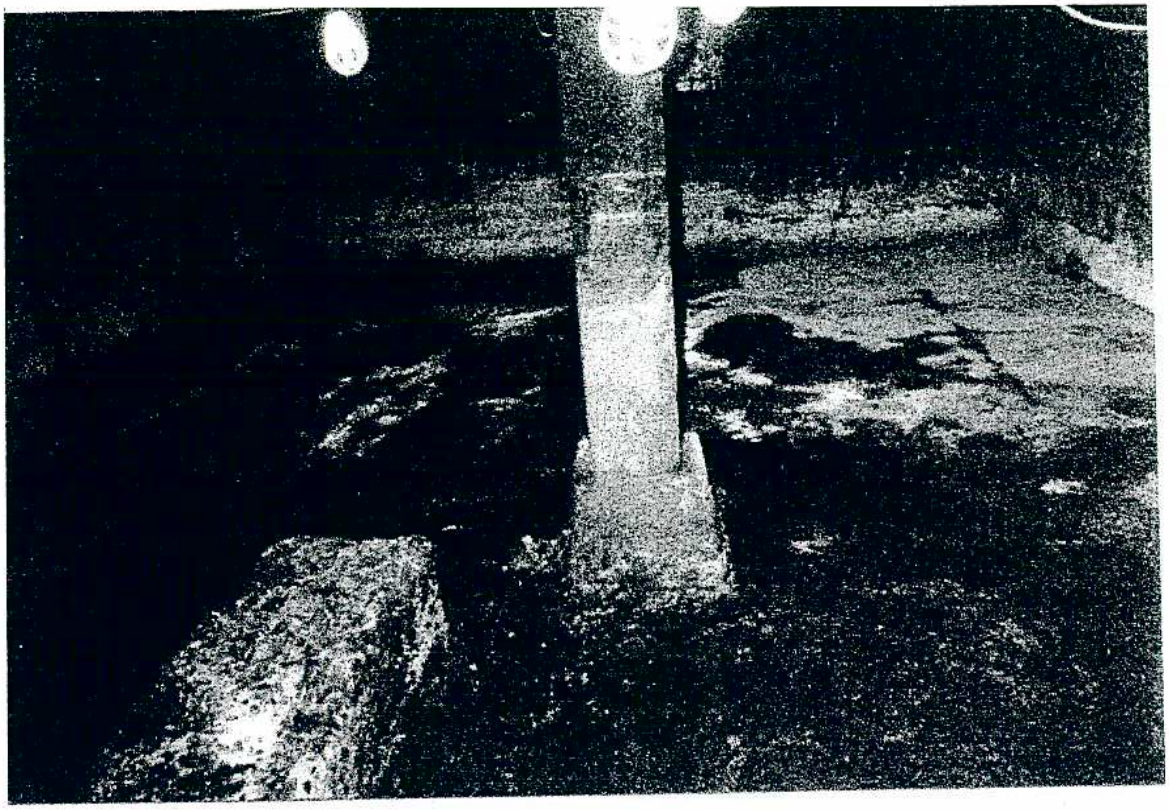

Photo 5: View to West of cleaned Building 4 Pit.

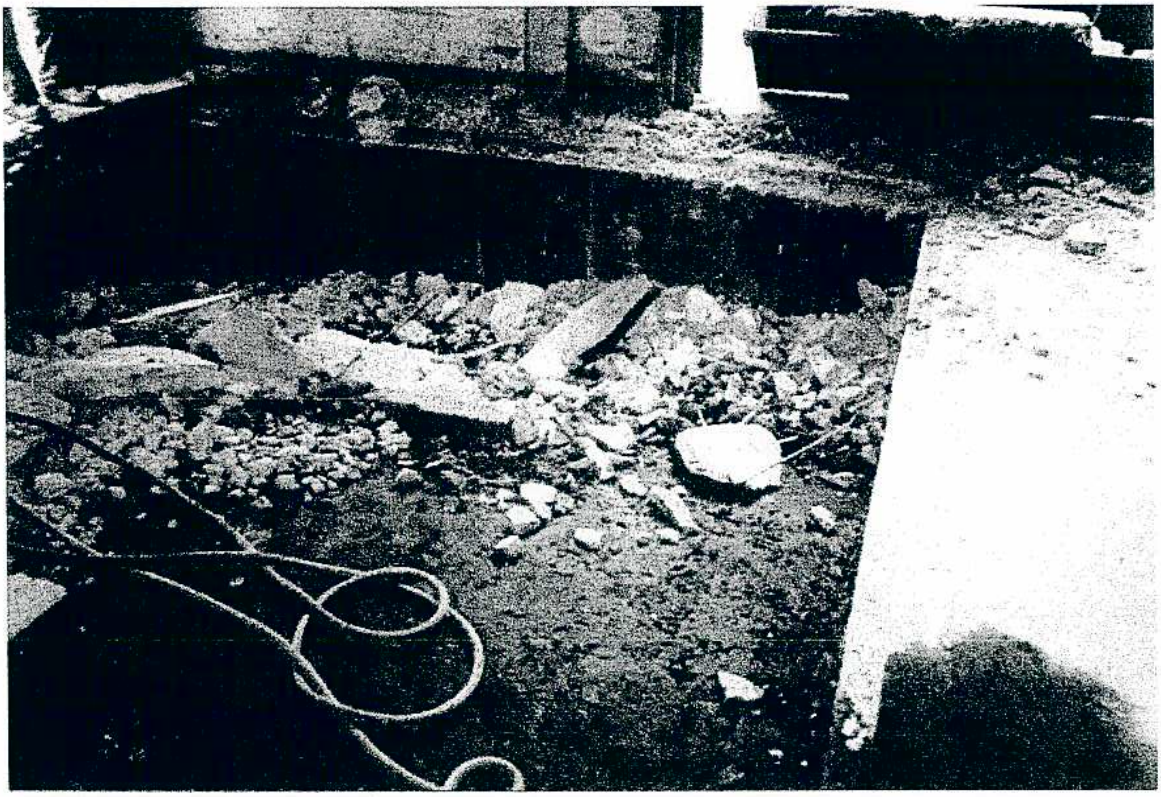

Photo 6: View to West of partially cemented pit, and debris from former roof.

Photo 7: View to North of partially cemented pit, and floor trench.

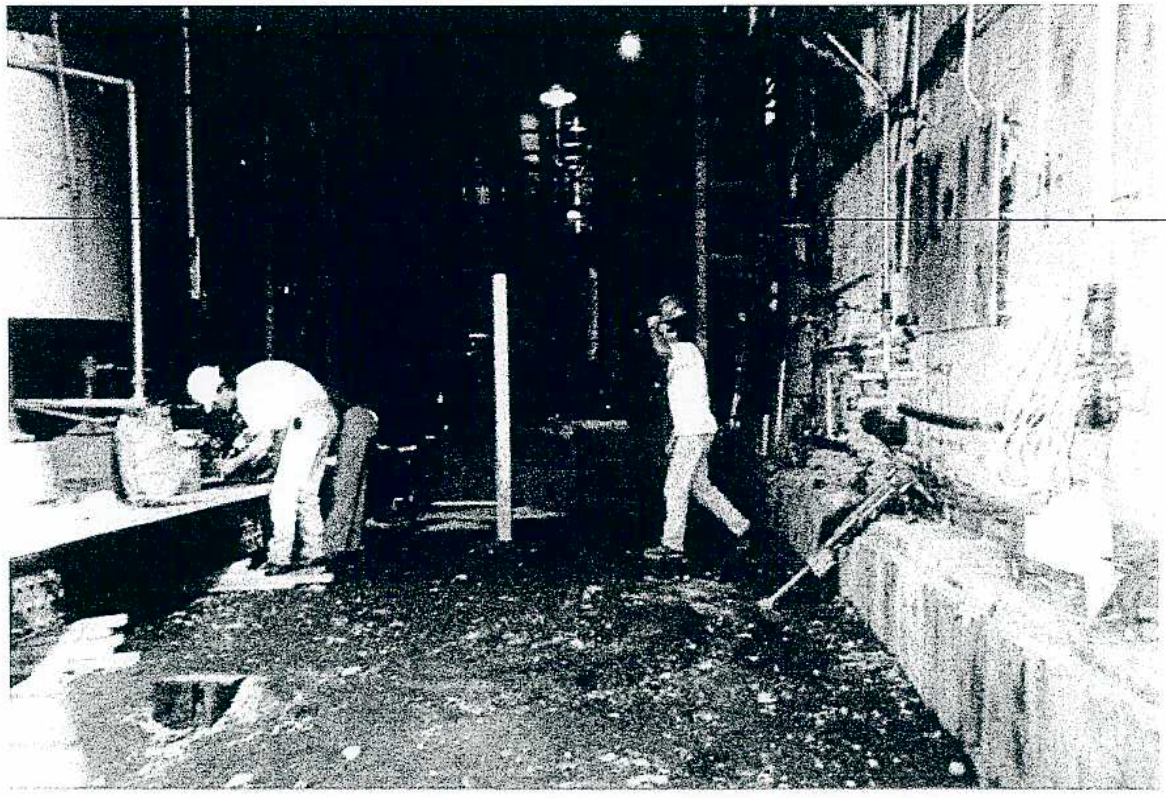

Photo 8: View to East of partially cemented pit, floor trench, and new sump well.

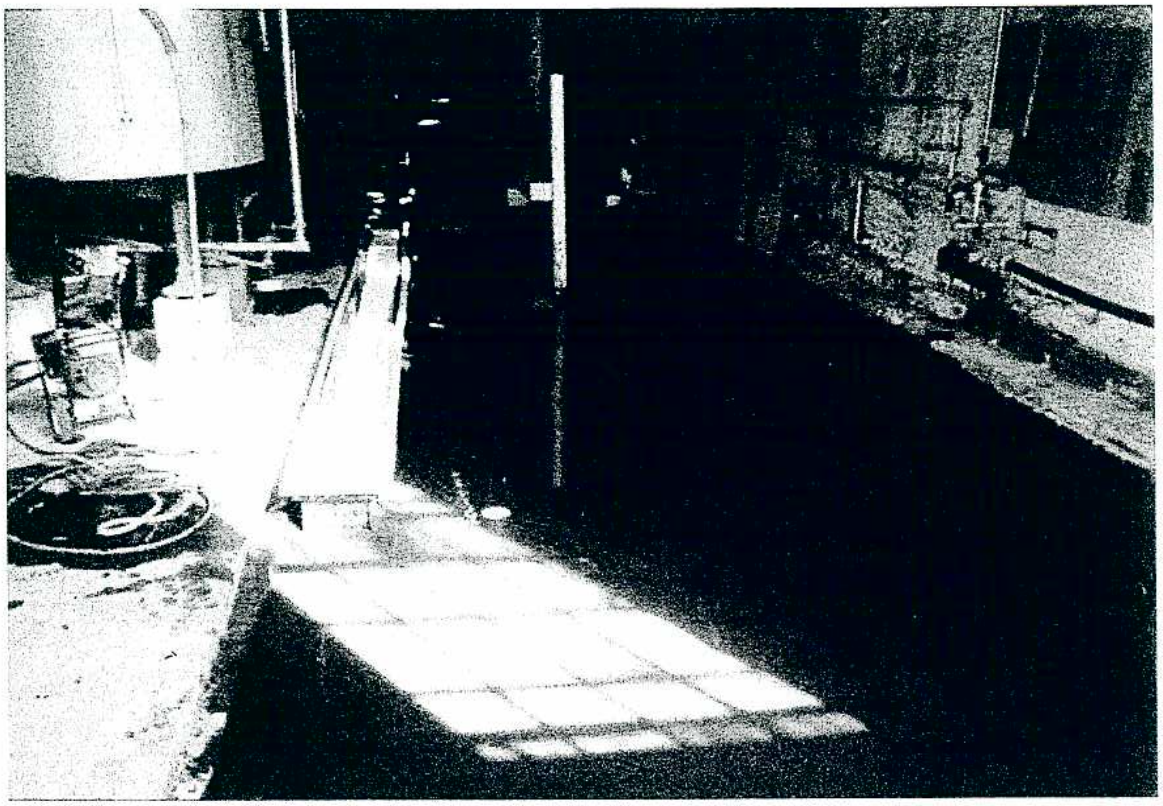

Photo 9: View to East of second flowable cement pour.

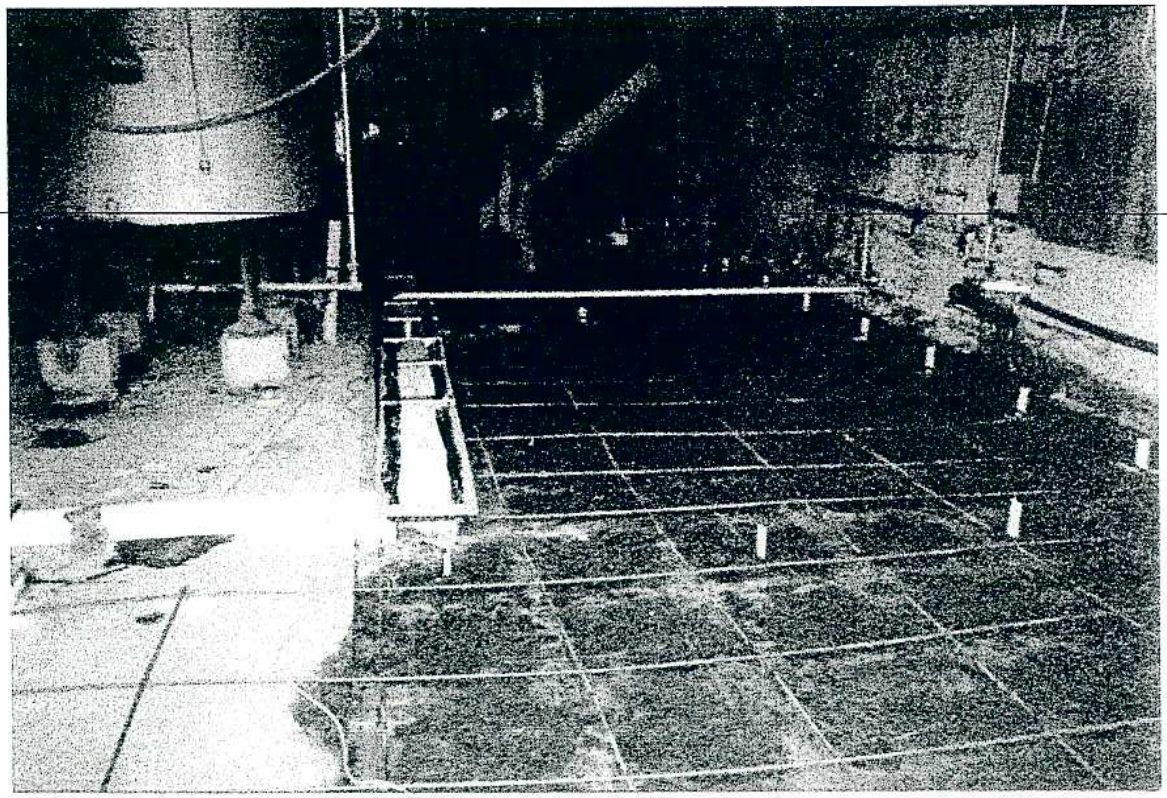

Photo 10: View to East of partially cemented pit, floor trench, and reinforcing rod for new floor.

Photo 11: View of completion for newly installed sump well.

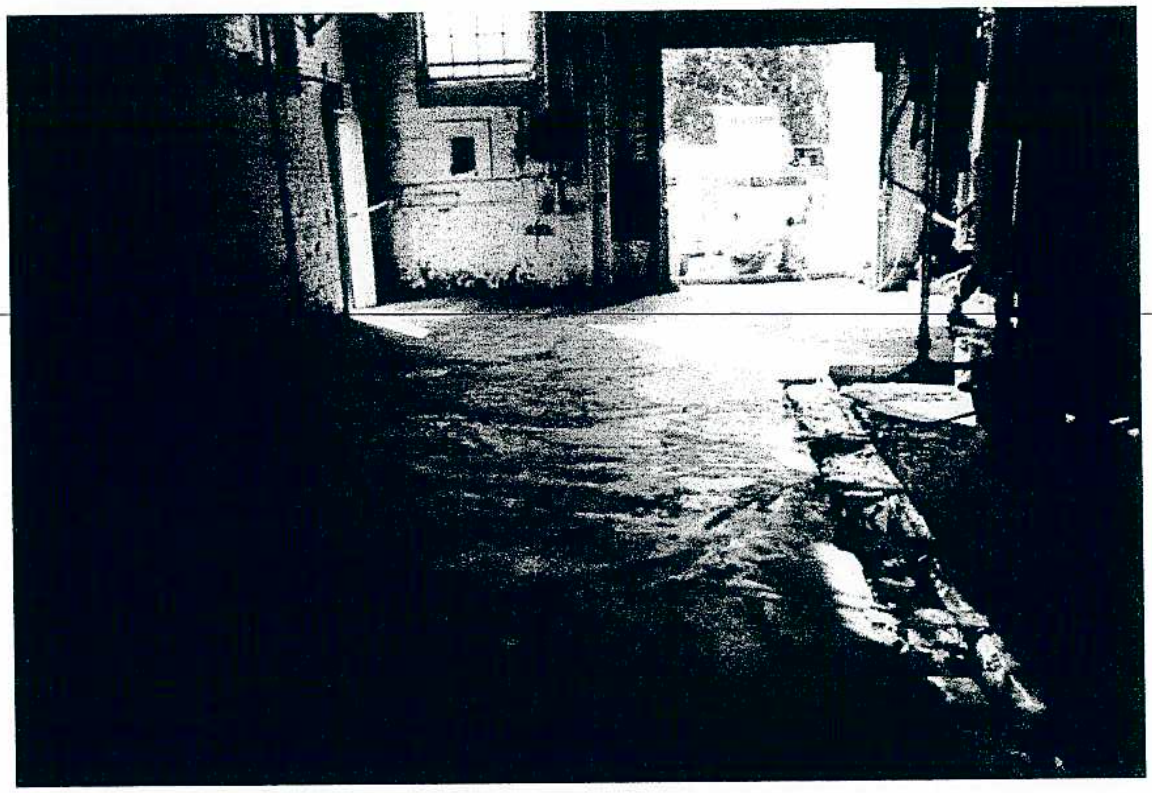

Photo 12: View to West of final cement pour.