INTERIM REMEDIAL MEASURE PLAN

124 VICTORY HIGHWAY PAINTED POST, NEW YORK



Prepared for:

T&K Realty, LLC 1413 N. George Street Rome, NY 13440

Submitted

MAY 2009

Prepared by:

THE PALMERT N GROUP

Scientific and Technical Consulting 6296 Fly Road, East Syracuse, New York 13057

INTERIM REMEDIAL MEASURE PLAN

124 VICTORY HIGHWAY PAINTED POST, NEW YORK

I hereby certify that this plan, specification, or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the state of New York.

Signatu	re: <u>Meghan M. Platt</u>	Typed or Printed Name:	Meghan M. Platt
Date:	May 15, 2009	Reg. No.:	083934



1.0 Introduction

This Interim Remedial Measure Plan (IRM) sets forth the remediation measures for the two areas identified by The Palmerton Group, LLC (Palmerton Group) during the Site Characterization Investigation (SCI) performed at the former Painted Post Car Mart, 124 Victory Highway, Painted Post, New York ("site", see Figure 1) in September 2008. The SCI was described in the Site Characterization Report (SCR) issued by Palmerton Group on November 6, 2008. The two areas are the former underground storage tank (UST) excavation and the drainage ditch located along the eastern site boundary (see Figure 2).

2.0 Background

In September 2008, Palmerton Group performed an SCI at the site at the request of T&K Realty, LLC (T&K). The SCI focused on six areas of concern. All work was performed in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved work plan (approved August 8, 2008) and pursuant to Consent Order Index # B8-0736-07-01. The investigation characterized the nature and extent of constituents of concern released at the site and pathways for those constituents to potentially reach onsite and offsite receptors. The findings of the SCI were presented in an SCR dated November 6, 2008. It was concluded in the SCR that remedial measures were necessary in two of the original areas of concern, the former UST excavation and drainage ditch.

Former UST Excavation

During the installation of a sewer line along the eastern side of the building in September 2006, an UST (approximately 1,000 gallons) was encountered. It was observed that a groundwater monitoring well had been installed through the top of the UST during a previous environmental investigation performed by Teeter Environmental Services, Inc (Teeter). According to Teeter, this monitoring well was noted to have not penetrated the bottom of the UST. Teeter also noted that the top of the UST was approximately 1.5 feet below the top of groundwater in the excavation, indicating the penetration of the UST by the monitoring well likely did not release the tank contents into the subsurface. However, during the removal of the UST by the construction contractor, some of the contents of the UST were released into the open excavation. Subsequent to the UST removal, the excavation was backfilled to grade level.

During the SCI conducted by Palmerton Group, soil and groundwater samples were collected from the former UST area. Only soil samples were collected from the area to the north of the former UST, from the drainage ditch, and from the area of the suspected former septic system. A debris sample was collected from one of the parking lot area surface drains and vapor samples were collected from the building sub-slab.

Laboratory analysis of the soil samples collected from the former UST area indicate that only concentrations of the volatile organic compound (VOC) 1,2-dichlorobenzene exceeded NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives, and was determined to be limited to within the former excavation (near MW-5). No semivolatile organic compounds (SVOCs) detected in soils at the former UST area exceeded the NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives. Metal concentrations of chromium were detected marginally above the NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives for hexavalent chromium. However, speciation of chromium was not performed. Furthermore, chromium was limited to one location within the former excavation (MW-5).

In groundwater samples collected from the former UST area, VOCs including benzene and 1,2-dichlorobenzene exceeded NYSDEC TAGM 4046 groundwater standards and were determined to be limited to within the former excavation (near MW-5).

Drainage Ditch

An outfall point from the property drainage system is located in a drainage ditch along the eastern property line. An oil / water separator that is connected to the drainage system is currently sealed closed, no longer discharging to the ditch. However, the oil / water separator likely discharged through this outfall in the past.

Drainage ditch soil samples indicated no VOCs or polychlorinated biphenyls (PCBs) were detected above NYSDEC 6NYCRR Part 375-6 - unrestricted soil use cleanup objectives. However, SVOC concentrations were detected above NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives in samples DS-2, DS-3, DS-4, and DS-6. Samples DS-2, DS-3, and DS-6 were collected in the area of the drainage outfall pipe and may be attributed to the previous activities at the site (recreational vehicle repair and automotive) and specifically were reported as containing concentrations of benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(A,H)anthracene, fluoranthene, and indeno(1,2,3-cd)pyrene above unrestricted soil use cleanup objectives. Sample DS-4 is located downstream and south of Victory Highway and is nearby and adjacent to potential offsite SVOC sources (i.e. gas station, road run-off, highway traffic, and adjacent parking lot). SVOC concentrations in DS-4 were almost 30 times lower than the results adjacent to the outfall.

Metal concentrations of total chromium and selenium were detected above the NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives. Chromium was detected in samples DS-2, DS-3, and DS-4. However, the chromium result is for total chromium, not hexavalent chromium as specified in NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives. Selenium was detected in DS-3 and DS-4.

Analytical summary tables presented in the SCR are attached as Appendix A.

Summary

The constituents found in the former UST area and the drainage ditch soils are limited and localized. Soil sampled and analyzed from the former UST excavation indicate that the only VOC to exceed NYSDEC 6NYCRR Part 375-6 – unrestricted soil use cleanup objectives is 1,2-dichlorobenzene. No SVOCs exceeded 6NYCRR Part 375-6 unrestricted soil use cleanup objectives.

In the drainage ditch, no VOCs and eight SVOCs [polynuclear aromatic hydrocarbon (PAHs)] were found to exceed NYSDEC 6NYCRR Part 375-6 unrestricted soil use cleanup objectives.

Though the exceedances in both areas are limited, the IRM is focused on the VOC 1,2dichlorobenzene within the former UST area and the PAHs benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo (A,H) anthracene, fluoranthene, and indeno(1,2,3-cd)pyrene found in the drainage ditch. To remediate these areas, soils will be removed and disposed at the appropriate disposal facility.

This Interim Remedial Measure Plan focuses on the removal of soil in two specific areas, the former UST excavation and the drainage ditch, shown in Figures 3 and 4, and as described in the SCR.

3.0 Former UST Excavation Remediation

In the area of the former UST, at least 60 cubic yards of existing material will be removed to address the VOC impacted soil. The area of concern is well delineated with clean soil samples collected from soil borings surrounding the excavation. The anticipated horizontal extent of the excavation (9 feet by 18 feet) is depicted in Figure 3. The excavation will be performed in accordance with the Standard Operating Procedure (SOP) for excavations as described in Appendix B. Excavated soils will be screened on a per-bucket interval with a photo-ionization detector (PID) as they are removed and segregated into contaminated and uncontaminated piles based on the PID readings. Soils having PID readings greater than 5 parts per million (ppm) will be deemed contaminated. These soils will be staged near the excavation on a plastic tarp before being disposed of at an approved facility. Soils with PID readings less than 5 ppm will be placed separate from the contaminated soils and will be used as backfill once the excavation has been completed.

Derived from the analytical results of the SCI, the deepest part of the excavation will extend 10 feet below ground surface (bgs), in the vicinity of MW-5. The extent of the excavation may increase based on field observations, PID readings, and in consultation with NYSDEC field personnel.

Prior to the start of excavation activities, a high vacuum extraction truck will be used to dewater the area in the immediate vicinity of MW-5, located in the former UST excavation. The same extraction truck will be used to dewater the excavation should groundwater be encountered during the excavation. Groundwater collected from the vacuum truck will be disposed of off-site at an approved disposal facility.

A sewer lateral exists in the area of the former UST and is reported to be constructed of four-inch diameter polyvinyl chloride (PVC) pipe. It is anticipated that the sewer lateral will be exposed during the excavation. Should the pipe be exposed during the excavation, it will be supported in accordance with the manufacturer's recommendations.

Once the contaminated soils have been removed, five confirmatory samples will be collected from the resulting excavation; one from each side wall and one from the bottom of the excavation. Additionally, a sample from the contaminated and non-contaminated soil piles will be collected. Should the excavation exceed 100 cubic yards, an additional soil sample will be collected from the contaminated soil pile for VOCs. The five excavation samples and the sample from the non-contaminated soil pile will be analyzed for VOCs per Method 8260B Target Compound List (TCL) and SVOCs per USEPA Method 8270C TCL with a rush turnaround time. The sample from the contaminated soil pile will be analyzed for VOCs per Method 8260B for Waste characterization and disposal purposes. All samples will be analyzed at an approved New York State Department of Health Environmental Laboratory Approval Program (ELAP) laboratory. The anticipated sample analysis is summarized in Table 1.

Upon receipt of analytical results confirming the non-contaminated soil pile is suitable for use as backfill (i.e, VOC and SVOC levels do not exceed NYSDEC 6 NYCRR Part 375-6 – unrestricted soil use cleanup objectives), the excavation in the former UST area will backfilled using the non-contaminated soil pile and additional off-site non-contaminated material, as needed. The sewer lateral, where exposed during the former UST excavation activities, will be bedded in sand. Fill material brought onsite will be certified clean as specified in DER-10 Appendix 5A or 6NYCRR375-6.8(a) unrestricted use from the quarry of origin. The excavation will be backfilled in six to 12 inch thick lifts, mechanically compacted into place, to the original lines and grades. No person will be permitted to enter the excavation when it exceeds a depth of four feet bgs if the excavation is not properly shored or does not have its sidewalls cut per OSHA regulations.

Contaminated soils will be disposed of at an approved facility. Manifests will be obtained by Palmerton Group for all materials removed for disposal from the site and provided to the site owner.

4.0 Drainage Ditch Remediation

Surface soils within the drainage ditch will be removed to address the SVOC impacts. It is anticipated that the excavation will not exceed an area measuring approximately 40

feet long by 20 feet wide, and extending approximately two feet below grade, as depicted in Figure 4. The drainage ditch in the immediate area of the outfall is approximately 20 feet wide. The surface sediment samples were collected over a span of approximately 20 feet and it is anticipated the excavation will need to extend 10 feet north and south of the samples. The excavation of the drainage ditch will take place only when there is no water in the ditch.

As with the UST excavation, the excavated soils will be screened with a PID and segregated into contaminated and non-contaminated piles. Based on field observations, PID readings, and in consultation with NYSDEC field personnel, the extent of the excavation may increase. Upon completion of the excavation, five confirmatory soil samples, one from each side wall and one from the floor of the excavation, will be collected. Should the excavation exceed the 40 foot sidewall length, one additional soil sample will be collected for each additional length of sidewall up to 30 feet long. An additional excavation floor sample will be collected for every 900 square feet of additional floor area. Should the excavation area exceed 100 cubic yards, an additional soil sample will be collected from the contaminated soil pile for SVOCs.

Collected soil samples will be analyzed at an approved ELAP laboratory for VOCs per Method 8260B TCL and SVOCs per Method 8270C TCL. The anticipated sample analysis is summarized in Table 1.

Upon receipt of analytical results confirming the non-contaminated soil pile is suitable for use as backfill (i.e, VOC and SVOC levels do not exceed NYSDEC 6 NYCRR Part 375-6 – unrestricted soil use cleanup objectives), the excavation in the drainage ditch will be backfilled using the non-contaminated drainage ditch soil pile. Additional off-site certified clean material will be used, as needed, to backfill the ditch to the original lines and grades.

Contaminated soils will be disposed of off-site in an approved facility. Manifests will be retained by Palmerton Group for all soil materials removed for disposal from the site.

5.0 Report

A letter report will be issued summarizing the remedial activities once the above described work has been completed.

Table 1Interim Remediation Measure PlanAnalytical Methods Summary124 Victory HighwayPainted Post, New York

Location	Sample ID	Matrix	# of Samples	Analytes	Method	Holding Time	Preservative	Volume
UST	UST Wall -1 UST Wall -2 UST Wall -3 UST Wall -4	Soil	7	TCL	8270C	7d Extraction 40d Analysis	None	4oz
Excavation	UST Floor Clean Stock Pile Contaminated Stock Pile*	Soil	7	TCL,STARS	8260B	14 d	None	4oz
Drainage	Ditch Wall -1 Ditch Wall -2 Ditch Wall -3 Ditch Wall -4	Soil	7	TCL	8270C	7d Extraction 40d Analysis	None	4oz
ditch	Ditch Floor Clean Stock Pile Contaminated Stock Pile ⁺	Soil	7	TCL,STARS	8260B	14 d	None	4oz
Fotal Num	ber of Samples							
	So	il:						

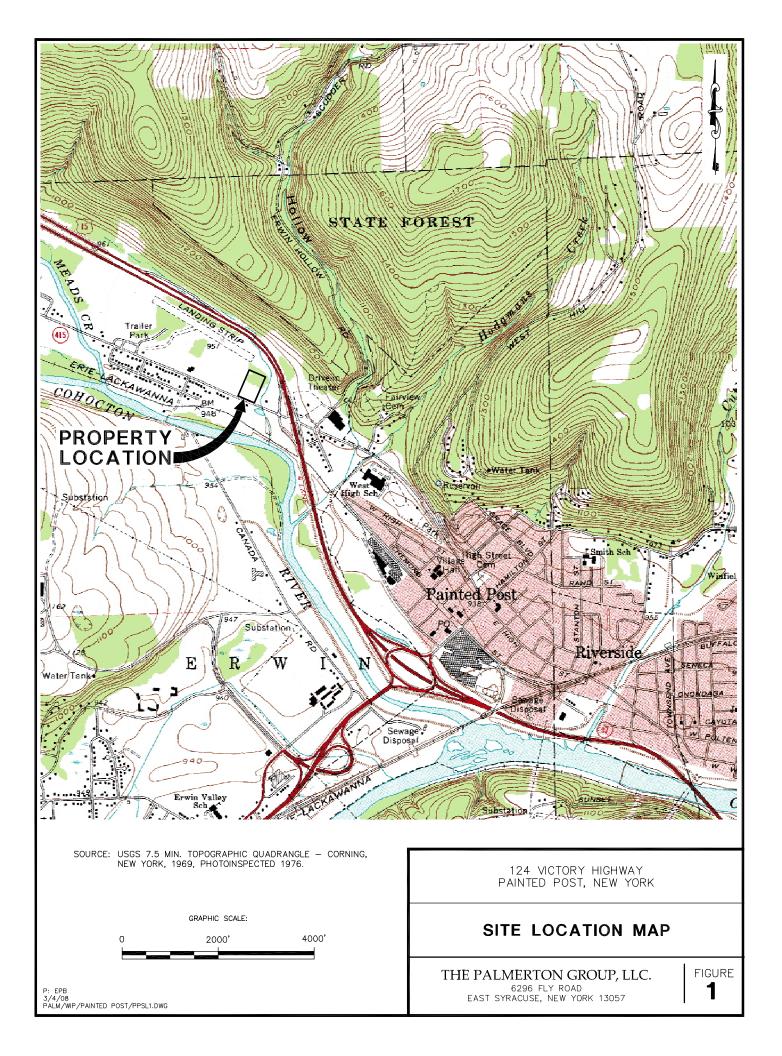
8270C: 14 8260B: 14

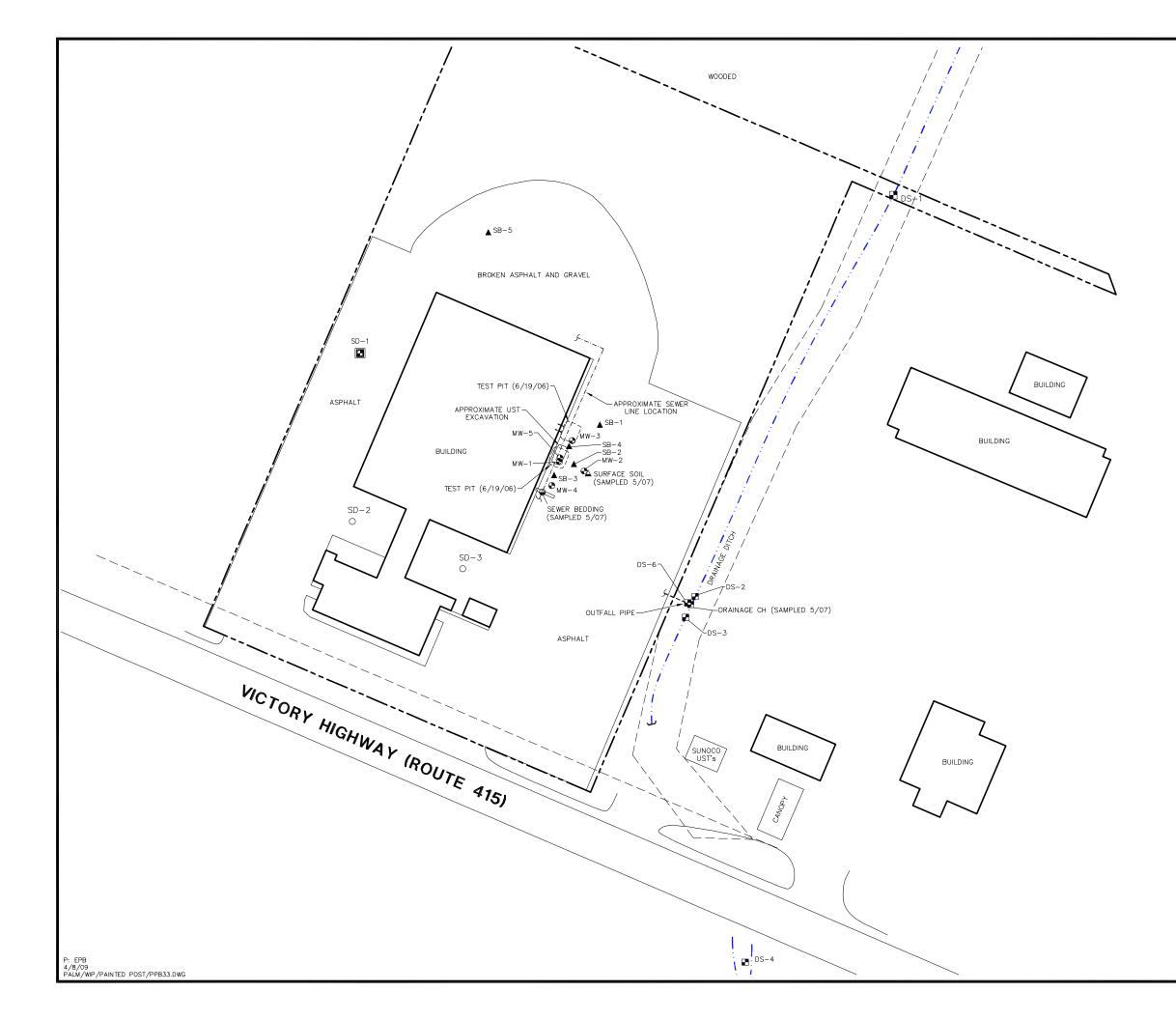
Notes: Analysis of all UST and drainage ditch excavation and stock pile samples will be on a rush turnaround: 8260B – 24 hours, 8270C – 48 hours Contaminated Soil Stock Pile sample will be collected by the remediation contractor and will be analyzed for waste characterization based on the requirements of the disposal facility where it will be taken and will include a minimum analysis for VOCs and SVOCs.

* An additional soil sample will be collected and analyzed for VOCs if the excavation area exceeds 100 cubic yards.

+ An additional soil sample will be collected and analyzed for SVOCs if the excavation area exceeds 100 cubic yards.

FIGURES







LEGEND:

---- APPROXIMATE PROPERTY LINE

---- EASEMENT

SD-1 O SURFACE DRAIN

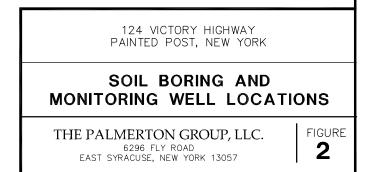
- MONITORING WELL
- SEWER BEDDING MATERIAL SAMPLE LOCATION
- ▲ SURFACE SOIL SAMPLE LOCATION
- ▲ SOIL BORING LOCATION
- STORM DRAIN SAMPLE LOCATION
- DRAINAGE DITCH SAMPLE LOCATION

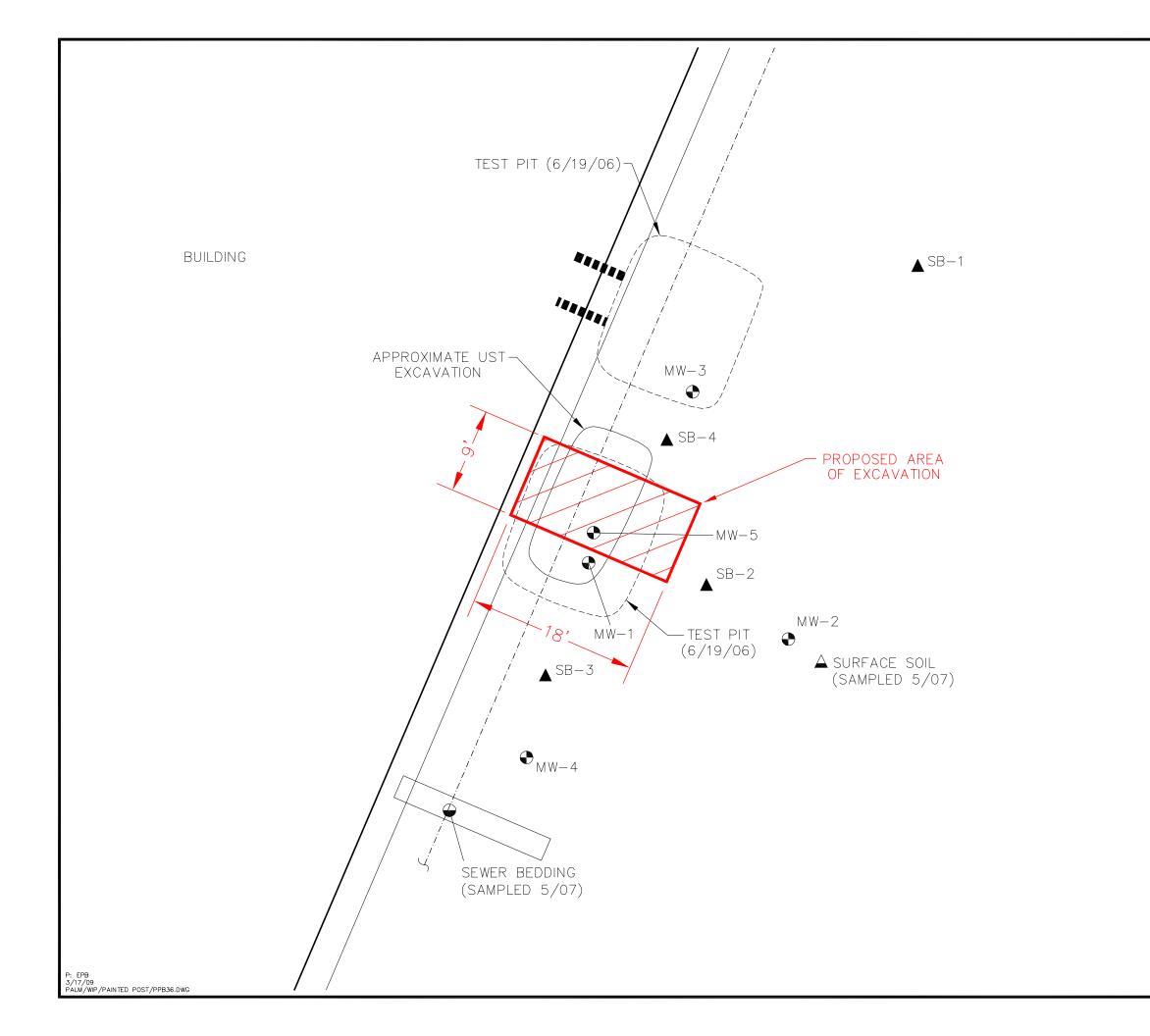
NOTES:

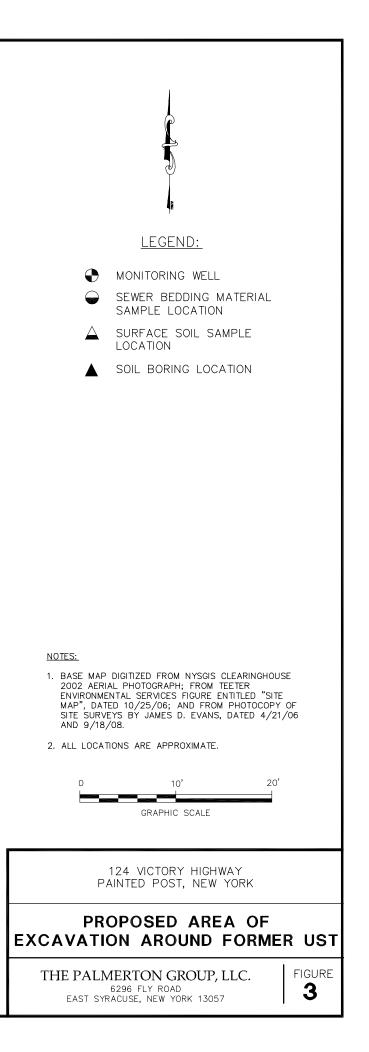
- BASE MAP DIGITIZED FROM NYSGIS CLEARINGHOUSE 2002 AERIAL PHOTOGRAPH; FROM TEETER ENVIRONMENTAL SERVICES FIGURE ENTITLED "SITE MAP", DATED 10/25/06; AND FROM PHOTOCOPY OF SITE SURVEYS BY JAMES D. EVANS, DATED 4/21/06 AND 9/18/08.
- 2. ALL LOCATIONS ARE APPROXIMATE.

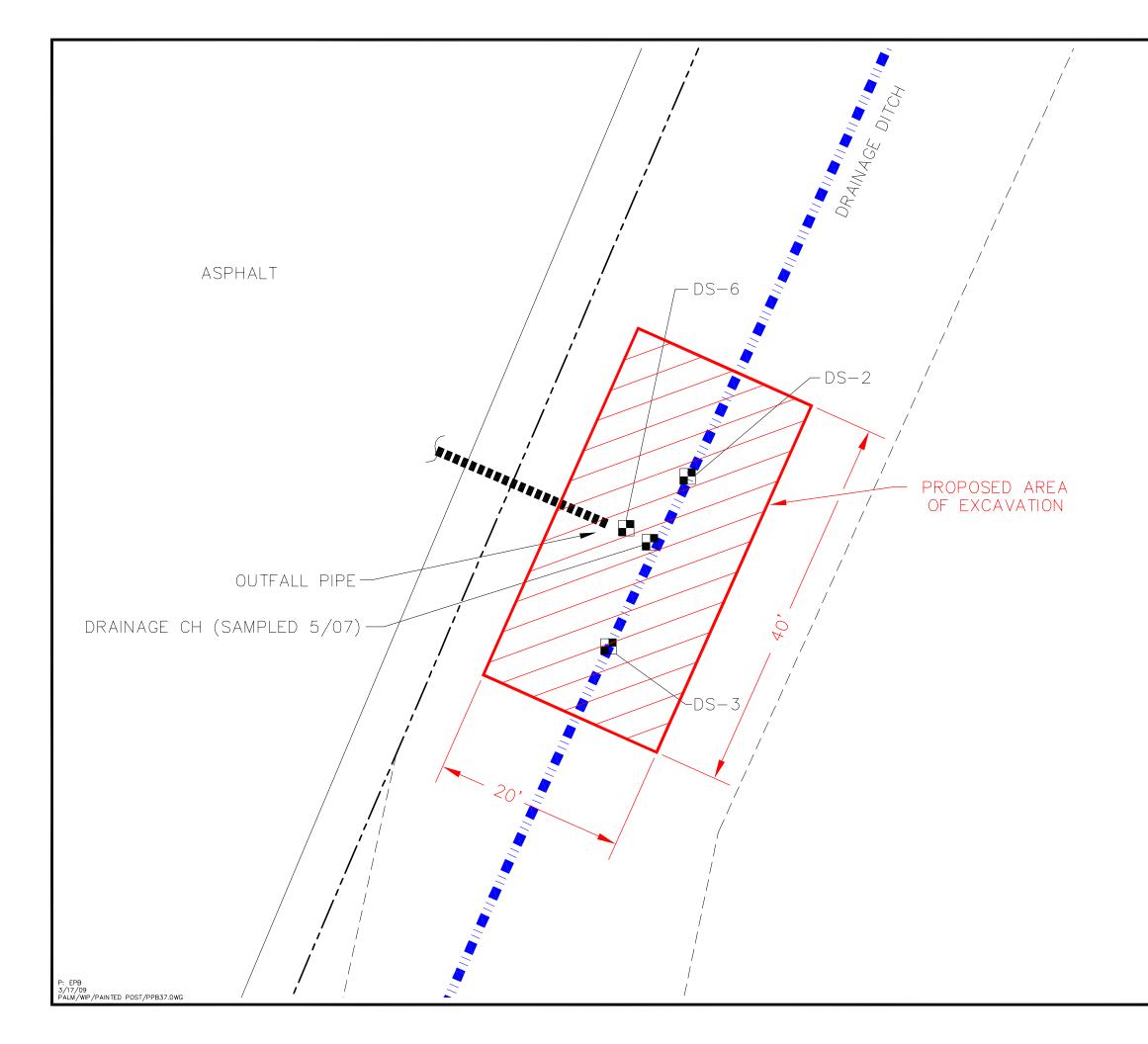
0	80)'	160'

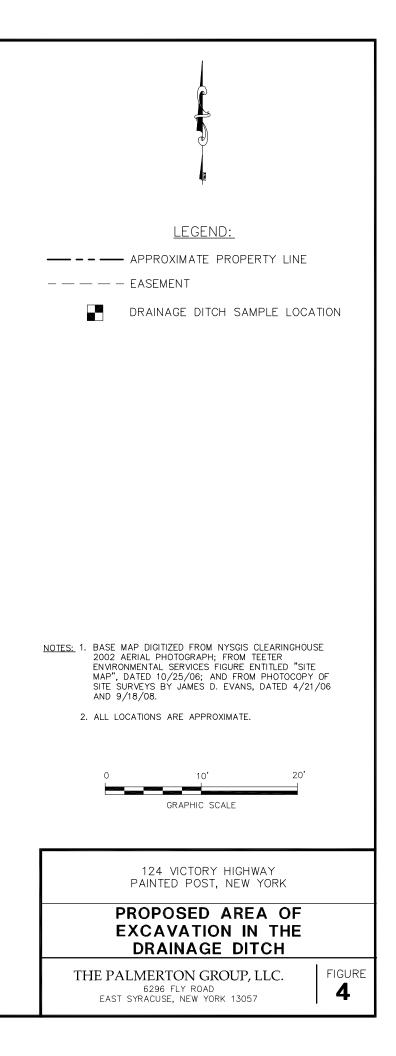
GRAPHIC SCALE











APPENDIX A

Analytical Summary Tables and Select Figures from SCR

Table 5B Soils Volatile Organic Compounds (μg/kg) 124 Victory Highway Painted Post, New York

		NYSDEC Valu		NYSDEC 6NYCRR Part 375 Values (µg/kg or ppb)	NYSDEC 6NY Values (µg									
		(µg/kg or ppb))	values (here of ppo)	vanes (µg	Kg of pp0)								
	144			Protection of Public Health	Protection of	Public Health								
Compound	Allowable	Soil Cleanup to	Recommended	Unrestricted Soil Use Cleanup Objectives	Restricted	Soil Use	DS-1	Duplicate of DS-1	DS-2	DS-3	DS-4	DS-6	EQUIP BLK	SD-1
	Soil Conc.	Protect GW	Soil Cleanup Objective ²		Restricted - Commercial	Restricted - Industrial	collected: 9/9/08	collected: 9/11/08						
Acetone	1.1	110	200	50	500,000	1,000,000	1.7JB ³	1.6JB ³	3.1JB ³	1.9JB ³	1.1JB ³	7.8JB ³	ND	2.0JB ³
Benzene	0.6	60	60	60	45,000	89,000	ND							
2-Butanone (MEK)	3	300	300	NA	NA	NA	ND	ND	ND	ND	ND	1.2J	ND	ND
Chlorobenzene	17	1700	1700	1100	500,000	1,000,000	ND							
1,2-Dibromo-3-Chloropropane	NA	NA	NA	NA	NA	NA	ND							
Cyclohexane	NA	NA	NA	NA	NA	NA	ND							
1,2-Dichlorobenzene	79	7900	7900	1100	500,000	1,000,000	ND	ND	ND	ND	ND	1.2J	ND	ND
1,3-Dichlorobenzene	15.5	1550	1600	2400	280,000	560,000	ND							
1,4-Dichlorobenzene	85	8500	8500	1800	130,000	250,000	ND							
CIS-1,2-Dichloroethene	1	100	100	250	500,000	1,000,000	ND							
Ethylbenzene	55	5500	5500	1,000	390,000	780,000	ND	ND	ND	ND	ND	0.86J	ND	ND
Isopropylbenzene	NA	NA	NA	NA	NA	NA	ND							
P-Isopropylbenzene	NA	NA	NA	NA	NA	NA	ND							
Methylcyclohexane	NA	NA	NA	NA	NA	NA	ND							
Methylene chloride	1	100	100	50	500,000	1,000,000	ND							
N-Propylbenzene	NA	NA	NA	NA	NA	NA	ND							
Tetrachloroethene	14	1400	1400	750	25,000	51,000	ND							
Toluene	15	1500	1500	750	500,000	1,000,000	ND	ND	ND	ND	ND	5.3J	ND	ND
1,2,4-Trichlorobenzene	34	3400	3400	0	190,000	380,000	ND							
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	ND							
1,3,5-Trimethylbenzene	NA	NA	· NA	NA	NA	NA	ND							
Trichloroethene	7	700	700	470	200,000	400,000	0.58J	ND						
Total Xylenes	12	1200	1200	1,600	500,000	1,000,000	ND							

NYSDEC TAGM 4046 Allowable Soil Concentration / Soil Cleanup Objectives to Protect Groundwater / Recommended Soil Cleanup Objective and STARS Memo

² As per TAGM 4046, Total VOCs <10,000 ppb, Total SVOCs <500,000 ppb, and Indiviual SVOCs <50,000 ppb

³ Suspected lab or equipment contamination

B - Indicates analyte also found in associated analytical blank

J - Indicates an estimated value

ND – Not detected above detection limits

NA – Not available

Units = µg/kg (regulatory guidance values converted from values published as mg/kg)

Table 5C Soils - Method Blanks Volatile Organic Compounds (µg/kg) 124 Victory Highway Painted Post, New York

		NYSDEC Valu (µg/kg or ppb		NYSDEC 6NYCRR Part 375 Values (µg/kg or ppb)	NYSDEC 6NY Values (µg						
				Protection of Public Health	Protection of	Public Health					
Compound	Allowable	Soil Cleanup to	Recommended	Unrestricted Soil Use Cleanup Objectives	Restricted	Soil Use	METHOD BLK #1	METHOD BLK #2	METHOD BLK #3	METHOD BLK #4	METHOD BLK #5
	Soil Conc.	Protect GW	Soil Cleanup Objective ²		Restricted - Commercial	Restricted - Industrial	analyzed: 9/17/08	analyzed: 9/18/08	analyzed: 9/19/08	analyzed: 9/18/08	analyzed: 9/19/08
Acetone	1.1	110	200	50	500,000	1,000,000	1.9J ³	2.8J ³	3.7J ³	ND	ND
Benzene	0.6	60	60	60	45,000	89,000	ND	ND	ND	ND	ND
2-Butanone (MEK)	3	300	300	NA	NA	NA	ND	ND	ND	ND	ND
Chlorobenzene	17	1700	1700	1100	500,000	1,000,000	ND	ND	ND	ND	ND
1,2-Dibromo-3-Chloropropane	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
Cyclohexane	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	79	7900	7900	1100	500,000	1,000,000	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	15.5	1550	1600	2400	280,000	560,000	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	85	8500	8500	1800	130,000	250,000	ND	ND	ND	ND	ND
CIS-1,2-Dichloroethene	1	100	100	250	500,000	1,000,000	ND	ND	ND	ND	ND
Ethylbenzene	55	5500	5500	1,000	390,000	780,000	ND	ND	ND	ND	ND
Isopropylbenzene	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
P-Isopropylbenzene	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
Methylcyclohexane	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
Methylene chloride	1	100	100	50	500,000	1,000,000	ND	ND	ND	ND	ND
N-Propylbenzene	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
Tetrachloroethene	14	1400	1400	750	25,000	51,000	ND	ND	ND	ND	ND
Toluene	15	1500	1500	750	500,000	1,000,000	ND	ND	ND	ND	ND
1,2,4-Trichlorobenzene	34	3400	3400	0	190,000	380,000	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
Trichloroethene	7	700	700	470	200,000	400,000	ND	ND	ND	ND	ND
Total Xylenes	12	1200	1200	1,600	500,000	1,000,000	ND	ND	ND	ND	ND
Totals		<10000		NA	NA	NA	ND	ND	ND	ND	ND

¹ NYSDEC TAGM 4046 Allowable Soil Concentration / Soil Cleanup Objectives to Protect Groundwater / Recommended Soil Cleanup Objective and STARS Memo ² As per TAGM 4046, Total VOCs <10,000 ppb, Total SVOCs <500,000 ppb, and Indiviual SVOCs <50,000 ppb

³ Suspected lab or equipment contamination

J - Indicates an estimated value

ND – Not detected above detection limits

NA – Not available

Units = µg/kg (regulatory guidance values converted from values published as mg/kg)

Table 6A Soils Semi Volatile Organic Compounds (μg/kg) 124 Victory Highway Painted Post, New York

	NIVEDI	EC Values ¹ (μg	0	NYSDEC 6NYCRR Part 375 Values (µg/kg or ppb)		YCRR Part 375 v/kg or ppb)												
	IN I SUI	C values (µg	kg or ppb)															
-				Protection of Public Health		Public Health												
Compound	Allowable Soil	Soil Cleanup	Recommended	Unrestricted Soil Use Cleanup	Restricted	d Soil Use	MW-5	MW-5	SB-1	SB-2	SB-2	SB-2D	SB-3	SB-3	SB-4	SB-4	SB-5 4-	EQUIP
	Conc.	to Protect GW	Soil Cleanup	Objectives	Restricted -	Restricted -	4-6' collected:	8-10' collected:	2-4' collected:	6-8' collected:	10-12' collected:	6-8' collected:	4-6' collected:	12-14' collected:	4-6' collected:	10-12' collected:	6' collected:	BLK collected
			Objective ²		Commercial	Industrial	9/8/08	9/8/08	9/8/08	9/8/08	9/8/08	9/8/08	9/8/08	9/8/08	9/8/08	9/8/08	9/9/08	9/9/08
Acenaphthene	900	90,000	50,000	98,000	500,000	1,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Anthracene	700	700,000	50,000	100,000	500,000	1,000,000	53J	42J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo (A) Anthracene	30	3000	224 or MDL	1,000	5,600	11,000	320J	330J	ND	78J	ND	ND	ND	ND	ND	ND	ND	ND
Benzo (A) Pyrene	110	11,000	61 or MDL	1,000	1,000	1,100	390	460	ND	90J	ND	ND	ND	ND	ND	ND	ND	ND
Benzo (B) Flouranthene	11	1,100	1,100	1,000	6,000	11,000	440	470	ND	110J	ND	ND	ND	ND	ND	ND	NĎ	ND
Benzo (G,H,I) Perylene	8,000	800,000	50,000	100,000	500,000	1,000,000	380J	480	ND	78J	ND	ND	ND	ND	ND	ND	ND	ND
Benzo (K) Flouranthene	11	1,100	1,100	1,700	56,000	110,000	330J	360J	ND	94J	ND	ND	ND	ND	ND	ND	ND	ND
1,1'-Biphenyl	NA	NA	NA	NA	NA	NA	40J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bis (2-Ethylhexyl) Phthalate	4,350	435,000	50,000	NA	NA	NA	390	490	68J	270J	81J	150J	250J	1100	190 J	100J	62J	ND
Carbazole	NA	NA	NA	NA	NA	NA	52J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chrysene	4	400	400	590	56,000	110,000	460	430	ND	120J	ND	36J	ND	ND	ND	ND	ND	ND
Dibenzo (A,H) Anthracene	1.65x10 ⁶	1.65x10 ⁸	14 or MDL	330	560	1,100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Di-N-Butylephthalate	81	8,100	8,100	NA	NA	NA	44J	ND	44J	ND	41J	ND	51J	ND	ND	42J	ND	ND
Di-N-Octyl Phthalate	1,200	120,000	50,000	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Fluoranthene	19000	1.9x10 ⁶	50,000	100,000	500,000	1,000,000	890	670	ND	220J	ND	64J	ND	91J	42J	ND	ND	ND
Fluorene	3,500	350,000	50,000	100,000	500,000	1,000,000	50J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Indeno (1,2,3-CD) Pyrene	32	3,200	3,200	500	5,600	11,000	280J	350J	ND	69J	ND	ND	ND	ND	ND	ND	ND	ND
2-Methylnaphthalene	364	36,400	36,400	NA	NA	NA	310J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Naphthalene	130	13,000	13,000	12,000	500,000	1,000,000	69J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Phenanthrene	2,200	220,000	50,000	100,000	500,000	1,000,000	380J	190J	ND	87J	ND	ND	ND	51J	ND	ND	ND	ND
Pyrene	6,650	665,000	50,000	100,000	500,000	1,000,000	770	570	ND	180J	ND	50J	ND	70J	ND	ND	ND	ND

NYSDEC TAGM 4046 Allowable Soil Concentration / Soil Cleanup Objectives to Protect Groundwater / Recommended Soil Cleanup Objective and STARS Memo

² As per TAGM 4046, Total VOCs <10,000 ppb, Total SVOCs <500,000 ppb, and Indiviual SVOCs <50,000 ppb

J - Indicates an estimated value

NA – Not available

ND - Not detected above detection limits

Units = µg/kg (regulatory guidance values converted from values published as mg/kg)

Table 6B Soil Semi Volatile Organic Compounds (µg/kg) 124 Victory Highway Painted Post, New York

	NYSDE	C Values ¹ (µg/k	g or ppb)	NYSDEC 6NYCRR Part 375 Values (µg/kg or ppb)		YCRR Part 375 Values g/kg or ppb)								
				Protection of Public Health		on of Public Health								
Compound	Allowable Soi Conc.	second of the second		Unrestricted Soil Use Cleanup Objectives	Rest	ricted Soil Use	DS-1	Duplicate of DS-1	DS-2	DS-3	DS-4	DS-6	EQUIP BLK	SD-1
			Objective ²		Restricted - Commercial	Restricted - Industrial	collected: 9/9/08	collected: 9/9/08	collected: 9/9/08	collected: 9/9/08	collected: 9/9/08	collected: 9/11/08	collected: 9/9/08	collected: 9/11/08
Acenaphthene	900	90,000	50,000	98,000	500,000	1,000,000	ND	ND	1000J	ND	ND	350J	ND	1500J
Anthracene	700	700,000	50,000	100,000	500,000	1,000,000	ND	ND	3300J	6400J	ND	710J	ND	2500J
Benzo (A) Anthracene	30	3000	224 or MDL	1,000	5,600	11,000	52J	60J	28000	36000	1400J	2600	ND	14000
Benzo (A) Pyrene	110	11,000	61 or MDL	1,000	1,000	1,100	ND	71J	42000	47000	2000J	3300	ND	14000
Benzo (B) Flouranthene	11	1,100	1,100	1,000	6,000	11,000	ND	773	51000	52000	2300J	3500	ND	13000
Benzo (G,H,I) Perylene	8,000	800,000	50,000	100,000	500,000	1,000,000	ND	55J	42000	41000	1600J	3200	ND	10000
Benzo (K) Flouranthene	11	1,100	1,100	1,700	56,000	110,000	ND	60J	44000	39000	1800J	3000	ND	1,5000
1,1'-Biphenyl	NA	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND
Bis (2-Ethylhexyl) Phthalate	4,350	435,000	50,000	NA	NA	NA	ND	ND	2000J	3700J	1400J	1200J	ND	2300J
Carbazole	. NA	NA	NA	NA	NA	NA	ND	ND	5700J	6600J	ND	470J	ND	3500J
Chrysene	4	400	400	590	56,000	110,000	72J	86J	53000	53000	2300J	3600	ND	18000
Dibenzo (A,H) Anthracene	1.65x10 ⁶	1.65x10 ⁸	14 or MDL	330	560	1,100	ND	ND	11000	11000J	ND	730J	ND	2800J
Di-N-Butylephthalate	81	8,100	8,100	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND
Di-N-Octyl Phthalate	1,200	120,000	50,000	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND
Fluoranthene	19000	1.9x10 ⁶	50,000	100,000	500,000	1,000,000	110J	140J	91000	110000	3800J	8100	ND	40000
Fluorene	3,500	350,000	50,000	100,000	500,000	1,000,000	ND	ND	1200J	2300J	ND	310J	ND	1300J
Indeno (1,2,3-CD) Pyrene	32	3,200	3,200	500	5,600	11,000	ND	48J	37000	34000	1300J	2500	ND	9100
2-Methylnaphthalene	364	36,400	36,400	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND
Naphthalene	130	13,000	13,000	12,000	500,000	1,000,000	ND	ND	ND	ND	ND	ND	ND	ND
Phenanthrene	2,200	220,000	50,000	100,000	500,000	1,000,000	43J	58J	33000	47000	1400J	4500	ND	20000
Рутепе	6,650	665,000	50,000	100,000	500,000	1,000,000	93J	110J	62000	75000	2500J	6300	ND	32000

NYSDEC TAGM 4046 Allowable Soil Concentration / Soil Cleanup Objectives to Protect Groundwater / Recommended Soil Cleanup Objective and STARS Memo

² As per TAGM 4046, Total VOCs <10,000 ppb, Total SVOCs <500,000 ppb, and Indiviual SVOCs <50,000 ppb

J – Indicates an estimated value

MDL – Method Detection Limit

NA – Not available

ND - Not detected above detection limits

Units = µg/kg (regulatory guidance values converted from values published as mg/kg)

Per NYSDEC instruction, TAGM 4046 Guidance values are presented and used only for analytes not available for 6 NYCRR Part 375-6

Concentration above unrestricted soil use cleanup objective

Table 6C Soil - Method Blanks Semi Volatile Organic Compounds (µg/kg) 124 Victory Highway Painted Post, New York

				NYSDEC 6NYCRR Part 375 Values	NYSDEC 6N	YCRR Part 375 Values			
	NYSDE	C Values ¹ (µg/k	g or ppb)	(µg/kg or ppb)	(μ	g/kg or ppb)			
				Protection of Public Health	Protectio	n of Public Health			
Compound	Allowable Soil	Soil Cleanup	Recommended	Unrestricted Soil Use Cleanup Objectives	Restr	ricted Soil Use	Method BLK #1	Method BLK #2	Method BLK #3
	Conc.	to Protect GW	Soil Cleanup	^					
			Objective ²		Restricted - Commercial	Restricted - Industrial	analyzed: 9/16/08	analyzed: 9/16/08	analyzed: 9/16/08
Acenaphthene	900	90,000	50,000	98,000	500,000	1,000,000	ND	ND	ND
Anthracene	700	700,000	50,000	100,000	500,000	1,000,000	ND	ND	ND
Benzo (A) Anthracene	30	3000	224 or MDL	1,000	5,600	11,000	ND	ND	ND
Benzo (A) Pyrene	110	11,000	61 or MDL	1,000	1,000	1,100	ND	ND	ND
Benzo (B) Flouranthene	11	1,100	1,100	1,000	6,000	11,000	ND	ND	ND
Benzo (G,H,I) Perylene	8,000	800,000	50,000	100,000	500,000	1,000,000	ND	ND	ND
Benzo (K) Flouranthene	11	1,100	1,100	1,700	56,000	110,000	ND	ND	ND
1,1'-Biphenyl	NA	NA	NA	NA	NA	NA	ND	ND	ND
Bis (2-Ethylhexyl) Phthalate	4,350	435,000	50,000	NA	NA	NA	ND	ND	ND
Carbazole	NA	NA	NA	NA	NA	NA	ND	ND	ND
Chrysene	4	400	400	590	56,000	110,000	ND	ND	ND
Dibenzo (A,H) Anthracene	1.65×10^{6}	1.65x10 ⁸	14 or MDL	330	560	1,100	ND	ND	ND
Di-N-Butylephthalate	81	8,100	8,100	NA	NA	NA	ND	ND	ND
Di-N-Octyl Phthalate	1,200	120,000	50,000	NA	NA	NA	ND	ND	ND
Fluoranthene	19000	1.9×10^{6}	50,000	100,000	500,000	1,000,000	ND	ND	ND
Fluorene	3,500	350,000	50,000	100,000	500,000	1,000,000	ND	ND	ND
Indeno (1,2,3-CD) Pyrene	32	3,200	3,200	500	5,600	11,000	ND	ND	ND
2-Methylnaphthalene	364	36,400	36,400	NA	NA	NA	ND	ND	ND
Naphthalene	130	13,000	13,000	12,000	500,000	1,000,000	ND	ND	ND
Phenanthrene	2,200	220,000	50,000	100,000	500,000	1,000,000	ND	ND	ND
Ругепе	6,650	665,000	50,000	100,000	500,000	1,000,000	ND	ND	ND

NYSDEC TAGM 4046 Allowable Soil Concentration / Soil Cleanup Objectives to Protect Groundwater / Recommended Soil Cleanup Objective and STARS Memo

² As per TAGM 4046, Total VOCs <10,000 ppb, Total SVOCs <500,000 ppb, and Indiviual SVOCs <50,000 ppb

MDL – Method Detection Limit

NA – Not available

ND – Not detected above detection limits

Units = µg/kg (regulatory guidance values converted from values published as mg/kg)

Table 7A Soils Metals (mg/kg) 124 Victory Highway Painted Post, New York

		Values ¹ (mg/kg or	NY SDEC ppm)	NYSDEC 6NYCRR Part 375 Values (ppm or mg/kg) Protection of Public Health	(ppr	CRR Part 375 Values n or mg/kg) n of Public Health												
Compound	Protect Water	Eastern USA	Recommended	Unrestricted Soil Use Cleanup Objectives	Restri	eted Soil Use	MW-5 4-6'	MW-5	SB-1 2-4'	SB-2 6-8'	SB-2 10-12'	SB-2D 6-8'	SB-3 4-6'	SB-3 12-14'	SB-4 4-6'	SB-4 12-14'	SB-5 4-6'	EQUIP BLK
	Quality	Background	Soil Cleanup Objective		Restricted - Commercial	Restricted - Industrial	4-6 collected on. 9/8/08	8-10' collected on. 9/8/08	z⊶ collected on: 9/8/08	collected on: 9/8/08	collected on: 9/8/08	collected on: 9/8/08	collected on 9/8/08	collected on: 9/8/08	collected on: 9/8/08	collected on: 9/8/08	collected on. 9/9/08	collected on: 9/9/08
Aluminum	NA	33,000	SB	NA	NA	NA	10700	8470	13400	11200	4280	12500	11300	7300	10300	8410	13900	139
Arsenic	NA	3-12	7.5 or SB	16	16	16	6.0	5.3	6.5	74	4.4	5.0	8.8	6.1	6.5	5.1	6.5	ND
Barium	NA	15-600	300 or SB	350	400	27,000	92.8	92.9	88.7	91.7	59.7	38.9	111	81.4	95.3	106	519	ND
Beryllium	NA	0-1 75	0.16 or SB	14	590	2,700	ND	ND	0.60	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	NA	0.1-1	1 or SB	2.5	9.3	60	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Calcium	NA	130-35,000	SB	NA	NA	NA	4760	21800	840	2890	88100	1080	1650	29200	9350	26800	1320	ND
Chromium	NA	1.5-40	10 or SB	19 (hexavalent)	400 (hexavalent)	800	13.9	20.3 ²	15.8	15.3	6.5	14.2	16.1	10,2	13.8	54.9	167	ND
Cobalt	NA	1.5-60	30 or \$B	NA	NA	NA	8.1	6.8	10.5	10.2	ND	7.8	79	6.1	8.7	6.6	9.4	ND
Соррег	NA	1-50	25 or SB	270	270	190,000	24.4	28.4	15.9	36.6	18.5	15.6	39.6	22.2	18.8	43.9	15.8	ND
Iron	NA	2,000-550,000	2,000 or SB	NA	NA	NA	19100	. 17700	23200	22700	10200	19000	23300	15500	20200	22600	24100	120
Lead	NA	•	.*	400	1,000	3,900	175	35.8	12.4	11.6	5.1	8.9	22.9	5.2	11.8	7.3	10.3	ND
Magnesium	NA	100-5,000	SB	NA	NA	NA	3900	5440	3490	3850	12500	3140	3220	10300	4560	9340	3900	ND
Manganese	NA	50-5,000	SB	2,000	15,000	67.000	649	910	565	994	465	274	772	582	592	733	401	ND
Mercury	NA	0.001-0.2	0.1	0.73 (elemental)	2.8	5.7	ND	ND	ND	ND	ND	ND	0.06	ND	ND	ND	ND	ND
Nickel	NA	0.5-25	13 or SB	130	310	27,000	19.6	17.7	21.7	22 5	9.7	19.7	22.9	15.4	18.8	23.9	21.8	ND
Potassium	NA	8,500-43,000	\$B	NA	NA	NA	789	841	820	936	593	647	996	816	871	688	784	ND
Selenium	NA	0.1-3.9	2 or SB	1	1,500	6,800	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Sodium	NA	6,000-8,000	SB	NA	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1160
Vanadıum	NA	1-300	150 or SB	NA	NA	NA	15.9	13.7	17.8	17.6	7	16.6	18.7	10.5	15.0	11.6	18.6	ND
Zine	NA	9-50	20 or SB	2,200	1,500	6,800	87.4	84.6	63.9	84.2	50.4	51.7	88.7	68.2	58.0	83.1	58.4	41.3

¹ NYSDEC TAGM 4046 Eastern USA Background / Recommended Soil Cleanup Objective and STARS Memo

² May exceed if hexavalent, however analysis is for total chromium

ND – Not detected above detection limits

NA – Not available

SB - Site Background

Units = mg/kg

Table 7B Soils Metals (mg/kg) 124 Victory Highway Painted Post, New York

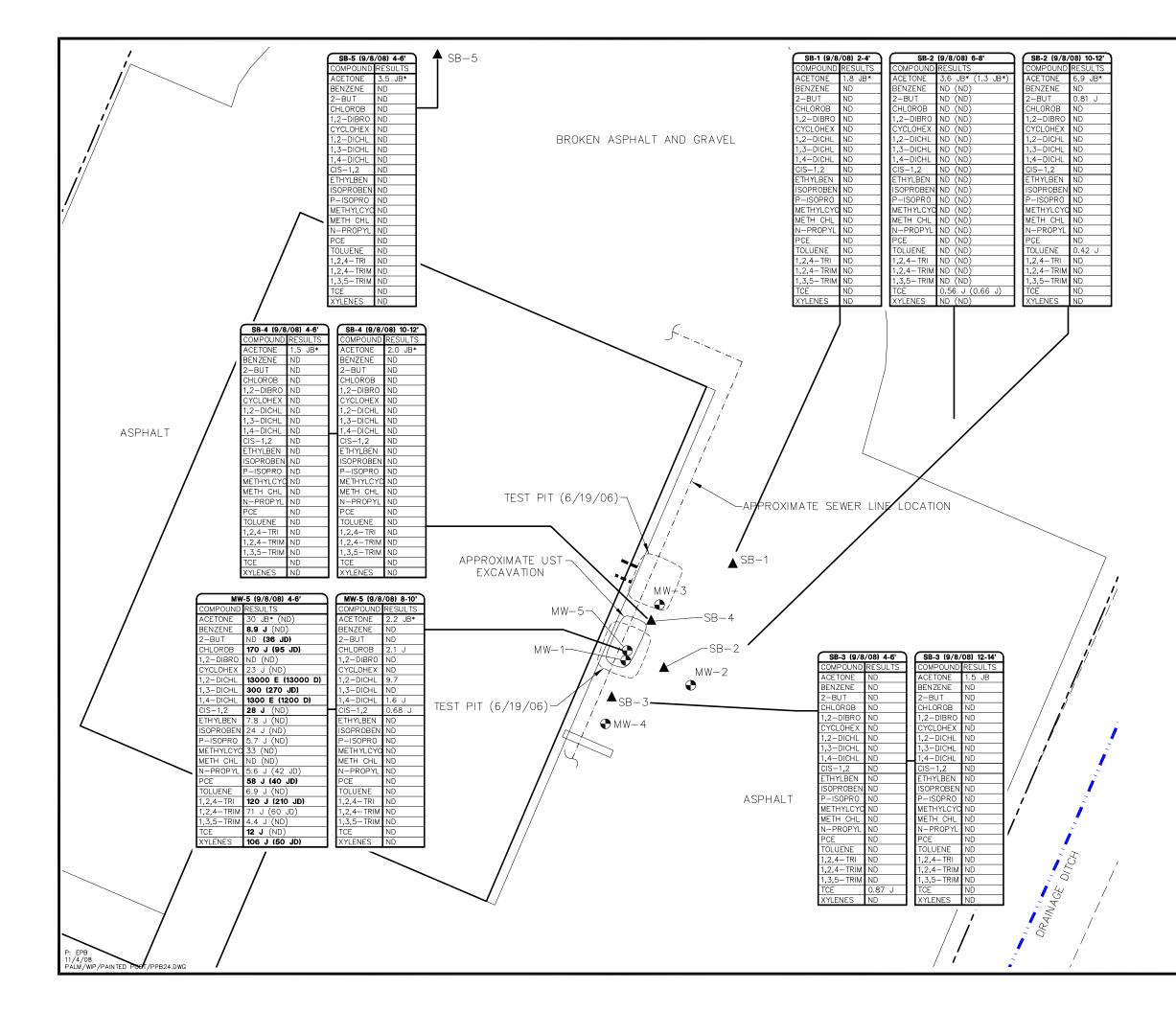
		NYSDEC Values (ppm)		NYSDEC 6NYCRR Part 375-6 Values (ppm) or mg/kg)		R Part 375-6 Values mg/kg)							
				Protection of Public Health	Protection of	Public Health							
Compound	Protect Water	Eastern USA	Recommended	Unrestricted Soil Use Cleanup Objectives	Restricte	d Soil Usc	DS-I	Duplicate	DS-2	DS-3	DS-4	DS-6	SD-1
	Quality	Background	Soil Cleanup Objective		Restricted - Commercial	Restricted - Industrial	collected on: 9/9/08	of DS-1 collected on: 9/9/08	collected on: 9/9/08	collected on: 9/9/08	collected on: 9/9/08	collected on: 9/11/08	collected on: 9/11/08
Aluminum	NA	33,000	SB	NA	NA	NA	13500	13400	12800	11900	11000	8870	6310
Arsenic	NA	3-12	7.5 or SB	16	16	16	7.0	6.3	5.8	6.7	8.7	2.5	5,5
Barium	NA	15-600	300 or SB	350	400	27,000	150	155	152	153	159	94.3	72.9
Beryllium	NA .	0-1.75	0.16 or SB	14	590	2,700	0.63	0.61	0.58	ND	ND	ND	ND
Cadmium	NA	0.1-1	t or SB	2.5	9.3	60	ND	ND	ND	1.2	ND	ND	ND
Calcium	NA	130-35,000	SB	NA	NA	NA	2350	2660	6300	8170	23300	1300	24100
Chromium	NA	1.5-40	10 or SB	19 (hexavalent)	400 (hexavalent)	800	17.2	16.8	28.5	26.1	32.9	14.5	12.0
Cobalı	NA	1.5-60	30 or SB	NA	NA	NA	10.1	9.9	9.1	8.8	9.3	ND	6.0
Copper	NA	1,0-50	25 or SB	270	270	190,000	20.2	20.2	46.5	52.7	55.0	20.8	39.0
Iron	NA	2,000-550,000	2,000 or SB	NA	NA	NA	22900	21500	2.4000	26700	24700	15800	17100
Lead	NA	•		400	1,000	3,900	28.1	26.7	143	191	75.9	71.3	11.7
Magnesium	NA	100-5,000	SB	NA	NA	NA	3270	3130	3890	6050	9150	2680	4480
Manganese	NA	50-5,000	SB	2,000	15,000	67,000	518	539	417	422	850	147	571
Mercury	NA	0.001-0.2	0,1	0.73 (elemental)	2.8	5.7	ND	0.04	0.10	0.11	0.06	0.06	ND
Nickel	NA	0.5-25	13 or SB	130	310	27,000	21,9	21.5	26.6	26.8	25.6	18.5	19.9
Potassium	NA	8,500-43,000	SB	NA	NA	NA	900	938	1310	1140	1350	863	630
Selenium	NA	0.1-3.9	2 or SB	1	1,500	6,800	ND	ND	ND	1.4	1.4	ND	ND
Sodium	NA	6,000-8,000	SB	NA	NA	NA	310	319	ND	ND	160	ND	ND
Vanadium	NA	1-300	150 or SB	NA	NA	NA	19.5	19	26.8	27.1	25.1	14.6	15.5
Zinc	NA	9-50	20 or SB	2,200	1,500	6,800	124	129	372	472	359	162	188

NYSDEC TAGM 4046 Eastern USA Background / Recommended Soil Cleanup Objective and STARS Memo

* Background levels for lead vary widely. Average levels in undeveloped, rural areas may range from 4-61 ppm. Average background levels in metropolitan or suburban areas or near highways are much higher and typically range from 200-500 ppm. ND – Not detected above detection limits NA – Not available Units = mg/kg Per NYSDEC instruction, TAGM 4046 Guidance values are presented and used only for analytes not available for 6 NYCRR Part 375-6 — Concentrations marginally exceed unrestricted soil use cleanup objectives. Chromium levels are for total chromium, and were not speciated for hexavalent chromium.

Table 8 Soil Polychlorinated Biphenyl Compounds (μg/kg) 124 Victory Highway Painted Post, New York

	NYSDEC 6NYCRR Part 375-6 Values (µg/kg or ppb)	NYSDEC 6NYCRR (µg/kg c					
Compound	Protection of Public Health Unrestricted Soil Use Cleanup Objectives	Protection of F Restricted	and a second	SB-5 4-6'	DS-6	SD-1	Method BLK
		Restricted - Commercial	Restricted - Industrial	collected: 9/9/08	collected: 9/11/08	collected: 9/11/08	analyzed: 9/20/08
PCB 1260	1,000	1,000	25,000	ND	84	ND	ND
ND – Not detected al Units – µg/kg	bove detection limits						



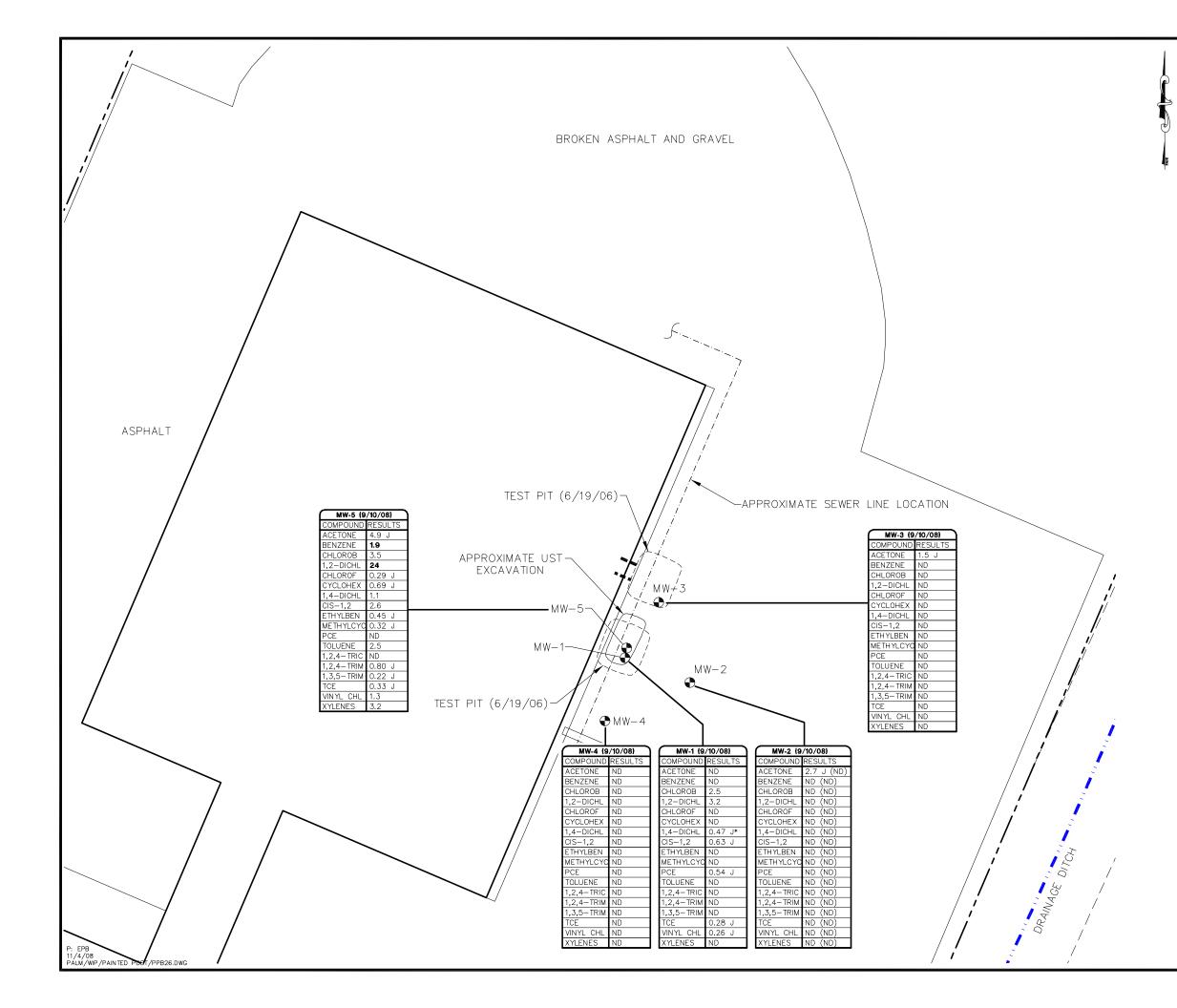
1		LEGEND:
_		APPROXIMATE PROPERTY LINE
<u> </u>		EASEMENT
	Ð	MONITORING WELL
Ĭ		SOIL BORING LOCATION
2084		SOIL ANALYTICAL RESULTS IN MICROGRAMS PER KILOGRAM (ug/Kg):
DS-1 (9/	20/08)	SAMPLE NUMBER (DATE) DEPTH
COMPOUND		
ACETONE	ND	ACETONE
BENZENE	ND	BENZENE
2-BUT	ND	2-BUTANONE (MEK)
CHLOROB	ND	CHLOROBENZENE
1,2-DIBRO	ND	1,2-DIBROMO-3-CHLOROPROPANE
CYCLOHEX 1,2-DICHL	ND ND	CYCLOHEXANE 1.2-DICHLOROBENZENE
1,2-DICHL	ND	1,3-DICHLOROBENZENE
1,4-DICHL	ND	1.4-DICHLOROBENZENE
CIS-1,2	ND	CIS-1.2-DICHLOROETHENE
ETHYLBEN	ND	ETHYLBENZENE
ISOPROBEN	ND	ISOPROPYLBENZENE
P-ISOPRO	ND	P-ISOPROPYLBENZENE
METHYLCYC	ND	METHYLCYCLOHEXANE
METH CHL	ND	METHYLENE CHLORIDE
N-PROPYL	ND	N-PROPYLBENZENE
PCE	ND	TETRACHLOROETHENE
TOLUENE	ND	TOLUENE
1,2,4-TRIC	ND	1,2,4 – TRICHLOROBENZENE
1,2,4-TRIM 1,3,5-TRIM	ND ND	1,2,4-TRIMETHYLBENZENE 1.3.5-TRIMETHYLBENZENE
TCE	ND	TRICHLOROETHENE
XYLENES	ND	XYLENES (TOTAL)
	J	ESTIMATED VALUE
	*	SUSPECTED LAB CONTAMINATION
	ND	NOT DETECTED
	(0.66 J)	DUPLICATE SAMPLE RESULTS
	В	COMPOUND ALSO FOUND IN BLANK
	D	ANALYTICAL DILUTION OF 125.0
	13,000E	BOLD VALUE INDICATES THE RESULT EXCEEDS THE RECOMMENDED SOIL CLEANUP OBJECTIVE

NOTES:

- 1. BASE MAP DIGITIZED FROM NYSGIS CLEARINGHOUSE 2002 AERIAL PHOTOGRAPH; FROM TEETER ENVIRONMENTAL SERVICES FIGURE ENTITLED "SITE MAP", DATED 10/25/06; AND FROM PHOTOCOPY OF SITE SURVEYS BY JAMES D. EVANS, DATED 4/21/06 AND 9/18/08.
- 2. ALL LOCATIONS ARE APPROXIMATE.

60' 30' 0 GRAPHIC SCALE

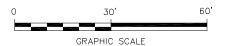
124 VICTORY HIGHWAY PAINTED POST, NEW YORK SOIL BORING AND MW-5 SOIL VOCs FIGURE THE PALMERTON GROUP, LLC. 6296 FLY ROAD 8 EAST SYRACUSE, NEW YORK 13057



	LEGEND:
	- APPROXIMATE PROPERTY LINE
	- EASEMENT
Ð	MONITORING WELL
	GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER (ug/L)
MW-1 (9/10/08)	WELL NUMBER (SAMPLE DATE)
COMPOUND RESULTS ACETONE ND BENZENE ND CHLOROB ND 1,2-DICHL ND CYCLOHEX ND CYCLOHEX ND CIS-1,2 ND CIS-1,2 ND CITHYLBEN ND METHYLCYC ND TOLUENE ND 1,2,4-TRIC ND 1,3,5-TRIM ND TCE ND	ACE TONE BENZENE CHLOROBENZENE 1,2-DICHLOROBENZENE CHLOROFORM CYCLOHEXANE 1,4-DICHLOROBENZENE CIS-1,2-DICHLOROETHENE ETHYLBENZENE METHYLCYCLOHEXANE TETRACHLOROETHENE TOLUENE 1,2,4-TRICHLOROBENZENE 1,2,4-TRIMETHYLBENZENE T,3,5-TRIMETHYLBENZENE TRICHLOROETHENE
VINYL CHL ND XYLENES ND	VINYL CHLORIDE XYLENES (TOTAL)
J	ESTIMATED VALUE
*	SUSPECTED LAB CONTAMINATION
ND	NOT DETECTED
(ND)	DUPLICATE SAMPLE RESULTS
7.3	BOLD VALUE INDICATES THE RESULT EXCEEDS THE NYSDEC GROUNDWATER STANDARD

NOTES:

- 1. BASE MAP DIGITIZED FROM NYSGIS CLEARINGHOUSE 2002 AERIAL PHOTOGRAPH; FROM TEETER ENVIRONMENTAL SERVICES FIGURE ENTITLED "SITE MAP", DATED 10/25/06; AND FROM PHOTOCOPY OF SITE SURVEYS BY JAMES D. EVANS, DATED 4/21/06 AND 9/18/08.
- 2. ALL LOCATIONS ARE APPROXIMATE.



124 VICTORY HIGHWAY PAINTED POST, NEW YORK

GROUNDWATER VOCs

FIGURE

11

THE PALMERTON GROUP, LLC. 6296 FLY ROAD EAST SYRACUSE, NEW YORK 13057

APPENDIX B

Excavation Standard Operating Procedures

Appendix B

Excavation Standard Operating Procedures

Excavations will be made using a decontaminated, rubber-tired backhoe. Personnel should stand upwind of the excavation area to the extent possible. Continuous air monitoring will be conducted as indicated in the Site Health and Safety Plan (HASP) and Community Air Monitoring Program (CAMP). Excavation will be conducted at the selected locations that have been cleared for utilities until the target depth, groundwater, or bedrock is encountered, or to within the physical limits of the backhoe. Excavated materials and samples will be visually observed and described with respect to depth and location. Photographs of the excavation and of the removed soil will be taken and referenced by location and direction for future use. In addition, results of soil head space screening will be recorded. Headspace screening will be performed by placing a representative soil sample in a sandwich-sized plastic bag. The bag will be completely sealed other than a small entrance point, through which the sampling end of the screening instrument (i.e. photoionization detector) will be introduced to the airspace inside of the bag.

Field activities and observations will be logged in a bound field logbook or on an excavation log form, including a plan view of the excavation and cross-sections of the excavation walls, where appropriate. Where necessary to characterize subsurface soil conditions, soil will be collected according to procedures outlined in Appendix C.

Material removed from the excavation will generally be placed on polyethylene sheeting. If such material has been previously characterized for chemical constituents in situ, its subsequent disposition (e.g., replacement in the excavation) will be based on the results of that sampling, in accordance with applicable requirements. If the material has not previously been chemically characterized, it will be so characterized ex-situ as necessary to determine appropriate disposition, and its disposition will be based on those characterization results, in accordance with applicable requirements.

To facilitate surveying, the location of the excavation will be marked with stakes after it has been backfilled. Stakes should be placed at the ends of the excavation and at any significant bend or corner, as appropriate.

APPENDIX C

Soil Sampling Standard Operating Procedures

Appendix C

Soil Sampling Standard Operating Procedures for Analysis of Volatile and Semi-Volatile Organic Compounds from an Excavation or Test Pit

I. Introduction

This standard operating procedure (SOP) describes the field sampling procedures to collect soil samples for the analysis of volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). Soil samples will be collected in a manner that will minimize the loss of VOCs and SVOCs through volatilization and biodegradation. This SOP presents the procedures to collect soil samples from an excavation for low-level (sample concentrations less than 200 μ g/Kg, wet weight) and high-level (sample concentrations greater than 200 μ g/Kg, wet weight) VOC analyses without field preservation.

II. Materials

The following materials, as required, shall be available during soil sampling:

- Health and safety equipment (as required in the Health and Safety Plan);
- Photoionization detector (PID);
- Stainless steel spatula;
- Handiwipes or lint-free paper towels;
- Field notebook;
- Appropriate sample containers depending upon specific methodology (4-oz glass jar with Teflon-lined cap, pre-preserved 40 mL vial with septum seal, or equivalent Sampler); and
- Appropriate transport containers (coolers) with water ice and appropriate labeling, packing, and shipping materials.

III. Field Sampling

Collection of Sample

If the excavation is less than 3 feet deep, the sample may be collected directly from the sidewall of the test pit with a decontaminated stainless steel shovel, scoop, or hand auger.

If the test pit is deeper than 3 feet, the soil sample will be collected from the backhoe bucket, either directly or with a decontaminated stainless steel scoop or trowel. Samples should be homogenized, if appropriate.

Step 1 - Soil samples are collected directly from the test-pit sidewall or backhoe bucket, as appropriate, using a stainless steel decontaminated spatula.

Step 2 - Samples are collected in 4-oz (120 mL) wide-mouth glass jars with Teflon-lined screw caps.

Step 3 - Wipe the threads of the sample jar with a handiwipe or lint-free paper towel, to ensure an adequate seal.

Step 4 - Place sample containers in a transportation cooler on ice immediately after collection. Package and label the sample containers following the procedures specified in Appendix D.

III. Field Cleaning Procedures

Cleaning of sampling equipment (e.g., stainless-steel sampling tools) is to follow procedures presented in Appendix E. The sampling equipment is to be cleaned prior to the start of sampling activities, between samples, and following the completion of sampling activities.

IV. Disposal Methods

Rinse water, personal protective equipment, and other residuals generated during the equipment cleaning procedures will be placed in appropriate containers. Containerized waste will be disposed of by The Palmerton Group in accordance with the appropriate disposal requirements for the material type.

For this project, Ontario Specialty Contractors, Inc. (OSC) will manage disposal of liquid and solid waste. Upon receipt of waste characterization sample data, OSC will transport the containerized waste to a facility capable of neutralizing, stabilizing, and treating the waste prior to disposal. The exact facility where this will take place will not be determined until waste characterization is complete.

APPENDIX D

Sample Handling, Packaging, and Shipping Procedures

Appendix D

Sample Handling, Packing, and Shipping Procedures

I. Chain-of-Custody Procedures

Step 1 - Prior to collecting samples, complete the chain-of-custody (COC) form header information by filling in the project number, project name, and the name(s) of the sampling technician(s). Please note that it is important that COC information is printed legibly using indelible ink.

Step 2 - After sample collection, enter the individual sample information by filling in the following COC fields:

- 1. STA. NO. Indicates the station number or location that the sample was collected from. Appropriate values for this field include well locations, grid points, or soil boring identification numbers (e.g., MW-3, X-20, SB-30, etc.).
- 2. Date Indicates the date that the sample was collected. The date format to be followed should be mm/dd/yyyy (e.g., 03/07/2000).
- 3. Time Indicates the time at which the sample was collected. The time value should be presented using the military format. For example, 3:15 P.M. should be entered as 15:15.
- 4. Comp This field should be marked with an "X" if the sample was collected as a composite.
- 5. Grab This field should be marked with an "X" if the sample was collected as an individual grab sample.
- 6. Station Location This field should represent the complete sample name. Although, in some instances it may be similar to the STA. NO. field. An example of a complete sample name is SB-3 (0.5-1.0), where the 0.5-1.0 represents the depth interval in feet from where the sample was collected. Please note that it is very important that the use of hyphens in sample names and the depth units (i.e., feet or inches) remain consistent for all samples entered on the COC form. Sample names may also use the abbreviations "MS/MSD," "FB," "TB," and "DUP" as prefixes or suffixes to indicate that the sample is a matrix spike/matrix spike duplicate, field blank, trip blank, or field duplicate, respectively.
- 7. Number of Containers This field represents the number of containers that were collected at the sampling location to be submitted for analysis.
- 8. Analytical Parameters The analytical parameters that the samples are being analyzed for should be written legibly on the diagonal lines to the right of the

"number of containers" column. The analytical parameters should be chosen from those presented in Table 5. As much detail as possible should be presented to allow the analytical laboratory to properly analyze the samples. For example, polychlorinated biphenyl (PCB) analyses may be represented by entering "PCBs" or "Method 8082." Multiple methods and/or analytical parameters may be combined for each column (e.g., PCBs/VOCs/SVOCs or 8082/8260/8270). These columns should also be used to present project-specific parameter lists (i.e., Appendix IX+3 minus herbs and pests). QA/QC information may also be entered in a separate column for each parameter (e.g., PCBs - MS/MSD) to identify asample that the laboratory is to use for a specific QA/QC requirement. Each sample that requires a particular parameter analysis will be identified by placing an "X" in the appropriate analytical parameter column.

- 9. Remarks The remarks field should be used to communicate special analytical requirements to the laboratory. These requirements may be on a per sample basis such as "extract and hold sample until notified" or may be used to inform the laboratory of special reporting requirements for the entire SDG. Reporting requirements that should be specified in the remarks column include:
 - turn around time;
 - contact and address where data reports should be sent;
 - name of laboratory project manager; and
 - type of sample preservation that was utilized.
- 10. Relinquished By This field should contain the signature of the sampling technician that relinquished custody of the samples to the shipping courier or the analytical laboratory.
- 11. Date Indicates the date that the samples were relinquished. The date format should be mm/dd/yyyy (e.g., 03/07/2000).
- 12. Time Indicates the time that the samples were relinquished. The time value should be presented using the military format. For example, 3:15 P.M. should be entered as 15:15.
- 13. Received By This field should contain the signature of the sample courier or laboratory representative that received the samples from the sampling technician.

Step 3 - Complete as many COC forms as necessary to properly document the collection and transfer of the samples to the analytical laboratory.

Step 4 - Upon completion of the COC forms, forward two copies to the analytical laboratory and retain one for the field records.

II. Handling

Step 1 - After completing the sample collection procedures, record the following information in the field notebook with indelible ink:

- site name;
- sample identification code and other sample identification information, if appropriate;
- sampling method;
- date;
- name of sampler(s);
- time;
- location (project reference); and
- any other comments.

Step 2 - Fill in sample label with the following information in indelible ink:

- sample type (e.g., surface water);
- site name;
- sample identification code and other sample identification information, if applicable;
- analysis required;
- date;
- time sampled;
- initials of sampling personnel;
- sample type (composite or discrete);
- preservative added, if applicable.

Step 3 - Cover the label with clear packing tape to secure the label onto the container.

Step 4 - Check the caps on the sample containers to ensure that they are tightly sealed.

Step 5 - Wrap the sample container cap with clear packing tape to prevent it from becoming loose.

III. Packing

Step 1 - Using duct tape, secure the outside and inside of the drain plug at the bottom of the cooler that is used for sample transport.

Step 2 - Place each container or package in individual polyethylene bags (resealable-type) and seal. If a cooler temperature blank is supplied by the laboratory, it should be packaged following the same procedures as the samples. If the laboratory did not include a temperature blank, do not add one since the sample temperature will be determined by the laboratory using a calibrated infrared thermometer

Step 3 - Place 1 to 2 inches of cushioning material (i.e., vermiculite) at the bottom of the cooler.

Step 4 - Place the sealed sample containers upright in the cooler.

Step 5 - Package ice or blue ice in small resealable-type plastic bags and place loosely in the cooler. Do not pack ice so tightly that it may prevent addition of sufficient cushioning material. Samples placed on ice will be cooled to and maintained at a temperature of approximately 4° C.

Step 6 - Fill the remaining space in the cooler with cushioning material.

Step 7 - Place the completed COC forms in a large resealable-type bag and tape the bag to the inside of the cooler lid.

Step 8 - Close the lid of the cooler and fasten with packing tape.

Step 9 - Wrap strapping tape around both ends of the cooler.

Step 10 - Mark the cooler on the outside with the following information: shipping address, return address, "Fragile" labels on the top and on one side, and arrows indicating "This Side Up" on two adjacent sides.

Step 11 - Place custody seal evidence tape over front right and back left of the cooler lid and cover with clear plastic tape.

IV. Shipping

All samples will be delivered by an express carrier within 48 hours of sample collection if the samples are not delivered to the laboratory by the sampling personnel. Alternatively, a laboratory courier may be used for sample pickup. If parameters with short holding times are being analyzed (i.e., VOCs) sampling personnel will take precautions to assure that the maximum holding times for these parameters will not be exceeded.

The following COC procedures will apply to sample shipping:

- Relinquish the sample containers to the laboratory itself, or via express carrier or laboratory courier.
- When the samples are received by the laboratory, the laboratory personnel shall complete the COC by recording the data and time of receipt of samples, measure and record the internal temperature of the shipping container, and then check the sample identification numbers on the containers to ensure that they correspond to the COC forms.

APPENDIX E

Standard Operating Procedures for Equipment Decontamination

Appendix E

Standard Operating Procedures for Equipment Decontamination

I. Introduction

The equipment cleaning procedures described herein include pre-field, in the field, and post-field cleaning of sampling equipment which will be conducted in the field. Sampling equipment consists of soil sampling equipment, well construction materials, groundwater, sediment, and surface water collection devices, water testing instruments, down-hole geophysical instruments, and other activity specific sampling equipment. Non-disposable equipment will be cleaned after completing each sampling event, between sampling events, and prior to leaving the site. Cleaning procedures of sampling equipment will be monitored through collection of field blank samples as specified in the applicable work plan.

II. Equipment and Materials

A designated area will be established to conduct cleaning of sampling equipment in the field prior to and between sample collection. Equipment cleaning areas will be set up within or adjacent to the specific work area. Equipment to be cleaned in the field may include split-spoons, bailers, well pumps, spatulas, etc.

A. Field Cleaning Materials

The following materials, as required, will be available during field cleaning procedures:

- health and safety equipment, as required in the Health and Safety Plan (HASP);
- distilled/deionized water;
- non-phosphate soap;
- tap water;
- appropriate cleaning solvent (e.g., hexane, acetone);
- nitric acid;
- rinse collection plastic containers;
- plastic overpack drum;
- brushes;
- plastic sheeting;
- large heavy-duty garbage bags;
- spray bottles;
- resealable-type bags;
- hand wipes; and
- field notebook.

B. Cleaning of Sampling Equivalent when Analyzing for Organic Constituents

Step 1: Non-phosphate detergent and water wash to removal all visible particulate matter and any residual oils or grease.

Step 2: Tap water rinse to remove the detergent solution.

Step 3: Solvent rinse with hexane (unless volatiles are being sampled, in which case methanol should be used).

Step 4: Distilled/deionized water rinse.

Step 5: Repeat solvent and water rinse two more times (i.e., triple rinse) and allow to air dry.

C. Cleaning of Sampling Equipment when Analyzing for Inorganic Constituents

Step1: Non-phosphate detergent and water wash to removal all visible particulate matter and any residual oils or grease.

Step 2: Tap water rinse to remove the detergent solution.

Step 3: Nitric acid rinse.

Step 4: Non-phosphate detergent and water wash to removal all visible particulate matter and any residual oils or grease.

D. Decontamination of Submersible Pumps

Submersible pumps may be used to evacuate stagnant groundwater in the well casing. The pumps will be cleaned and flushed between uses. This cleaning process will consist of an external detergent wash and tap water rinse, followed by a flush of potable water through the pump. This flushing will be accomplished by the use of an appropriate container filled with potable water. The pump will run long enough to effectively flush the pump housing and hose. Caution should be exercised to avoid contact with the pump casing and water in the container while the pump is running (do not use metal drums or garbage cans) to avoid electric shock. Disconnect the pump from power source before handling. The pump and hose should be placed on clean polyethylene sheeting to avoid contact with the ground surface.

E. Disposal Methods

Rinse water, PPE, and other residuals generated during the equipment cleaning procedures will be placed in appropriate containers. Containerized waste will be disposed of by The Palmerton Group in accordance with the appropriate disposal requirements for the material type.

III. Soil Boring Installation

A. Decontamination of Heavy Equipment

Items such as drill rigs, well casing, and auger flights all present potential sources of contamination to environmental samples. Heavy equipment may potentially retain contaminants from other sources, such as roadways or storage areas, or have soil material from previous job sites that have not been removed.

If heavy equipment brought on site is suspected to contain contaminants from a prior job, it will be thoroughly cleaned according to the procedures described in Section IV. It will also be cleaned between drilling locations. Those areas that are in close proximity to materials being sampled, such as auger flights, drill rods, and drill bits, will be targeted for cleaning.

IV. Subsurface Soil Sampling Procedures

This procedure applies to heavy equipment.

A. Safety Precautions

Before a piece of equipment can be cleaned, it must be disconnected and disabled in accordance with standard Energy Control and Power Lock-Out Procedures. All energy sources including stored energy must be removed prior to cleaning. Do not attempt to clean equipment that is in service or still connected to power. Protective clothing, in addition to that specified by general safety procedures (i.e., safety glasses, safety toe shoes) is required during cleaning. The cleaning contractor shall have a written HASP appropriate for the expected operations including measurements for determining the need for more stringent levels of protection.

Additional protective equipment may be required for some tasks. These contingencies should be included in the HASP.

<u>B. Required Equipment</u>

The following equipment will be required or available for use during cleaning procedures, depending on task- and equipment-specific needs:

- shop vacuum;
- lint-free absorbent towels;
- 6-mil polyethylene sheeting;
- assorted scrub brushes;
- waste disposal drums;
- cleaning fluids such as Knights Super Kleen, Simple Green, Aquanex MC, Zep Formula 50, Zep, Big Orange, or equal;
- aluminum duct tape; and

• oil/water absorbent Speedi-Dry compounds.

C. Set Up

Step 1: Put on protective clothing.

Step 2: Provide proper signs and barricades for the cleaning area to control access.

Step 3: Place the item to be cleaned on a cart inside one of the EDA washing chambers.

D. Cleaning Procedures

Step 1: Pre-clean the entire piece of equipment to remove all loose dust, dirt, scale, etc. by scraping, chipping, and spot cleaning with solvent or detergent to remove encrusted materials.

Step 2: Apply the cleaning solution to each surface of the item via a mist, aerosol spray, or cloth soaked in the cleaning solution. Control the application so that little or none of the cleaning solution puddles or runs down to the floor. Make sure that all surfaces are wetted. Use scrubbing brushes, if necessary, to loosen any visible dirt, stains, grease, etc. and then wipe down all surfaces with clean absorbent towels to clean and dry. For larger items it may be appropriate to clean the equipment in sections.

Step 3: Rinse the equipment with clean water.

Step 4: Repeat Steps 2 and 3. The item should be clean and dry. The equipment is ready to be re-used on site.

Step 5: Before leaving the area where a piece of equipment has been cleaned, a final check should be conducted to make sure all discarded materials including paper towels, plastic sheeting, disposable gloves, etc., have been picked up and placed in a properly labeled drum.

Step 6: At the end of the day all PPE must be cleaned.

E. Handling and Disposal of Waste Materials

All liquid and solid materials, including spent detergents, rinse waters, disposable clothing, residues from scraping and vacuuming, paper towels, plastic and any other wastes generated during cleaning procedures, are to be disposed of according to proper and accepted practices. Any drums used shall be properly marked, labeled, stored, and disposed in accordance with existing site waste management procedures.

For this project, Safety Kleen of Syracuse, New York will manage disposal of liquid waste. Upon receipt of waste characterization sample data, Safety Kleen will transport the drums to a facility capable of neutralizing, stabilizing, and treating the water prior to

disposal. The exact facility where this will take place will not be determined until waste characterization is complete.

APPENDIX F

Site Community Air Monitoring Plan and Health and Safety Plan

Community Air Monitoring Program

Per the New York NYDEC *DER-10 (Draft) Technical Guidance for Site Investigation and Remediation*, December, 2002, Palmerton Group has established this Community Air Monitoring Program (CAMP) for the protection of personnel in the immediate vicinity of activities such as soil boring installation, excavation, or sediment sample collection.

For ground-intrusive activities, such as soil boring or monitoring well installation, a program of continuous air monitoring will be implemented. VOCs will be monitored at the downwind perimeter of the of the immediate work area or exclusion zone on a continuous basis. If the work is being conducted inside, such as sub-slab soil vapor point installation, the building's heating and cooling system configuration will be taken into consideration when selecting a monitoring location such that the area most likely to collect VOC vapors will be monitored, for example a fresh air intake in the vicinity of the work area.

VOCs will be monitored with a field-calibrated PID capable of calculating 15-minute running average concentrations.

- If ambient air concentrations of VOCs at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities will be temporarily halted. If instantaneous measurements of total VOC levels indicate a rapid decrease to VOC concentrations below 5 ppm over background, work activities will be resumed with continued 15-minute averaged monitoring.
- If total VOC levels at the downwind perimeter of the work area exclusion zone persist at levels in excess of 5 ppm over background, but less than 25 ppm, work activities will be halted and the source of vapors will be identified. Corrective actions will be taken to abate emissions and monitoring will continue.
- Work activities will resume once total VOC concentrations 200 feet downwind of the work area or exclusion zone or half the distance to the nearest potential receptor or residential / commercial structure, whichever is less, but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the VOC concentration is above 25 ppm at the perimeter of the work area, activities will be shut down.

For non-ground-intrusive activities, such as sediment sample or groundwater sample collection, periodic monitoring for VOCs will be implemented. This might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a monitoring well cap or overturning soil, monitoring during well purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sample collection at wells on the curb of a busy street or adjacent to a school or residence. VOC concentration guidelines outlined above will be used to determine what appropriate action, if any, is necessary should VOC concentrations rise above background levels.

The Palmerton Group will employ a dust monitoring program during ground intrusive activities such as sub-slab vapor point or soil boring installations. Monitoring of the immediate work area will be conducted with a field instrument capable of measuring particulate matter ten microns or less in ambient air. Per USEPA guidance, work will be stopped and the dust will be allowed to settle if matriculate matter ten microns or less is measured in the immediate work area at a 24-hour average of 150 μ g/m³ or greater.

The Palmerton Group, LLC

SITE-SPECIFIC HEALTH AND SAFETY PLAN

Project: Painted Post Car Mart Site Characterization

Location: <u>124 Victory Highway, Painted Post, New York</u>

Proposed Date of Field Activities: <u>TBD</u>

Project Director: David L. Palmerton, Jr., CPG, CHMM

Project Manager: Matthew Hoskins

Prepared by: <u>Matthew Hoskins</u>

Date Prepared: March 20, 2009

Reviewed By: Paul W. Tranchell, CIH, CSP, RBP Palmerton Group Health and Safety Director

1. INTRODUCTION

1.1 POLICY

It is The Palmerton Group's policy to ensure the health and safety of its employees, the public, and the environment during performance of work it conducts. This site-specific health and safety plan establishes the procedures and requirements to ensure the health and safety of The Palmerton Group, LLC. (Palmerton Group) employees for the above-named project.

This site-specific health and safety plan has been developed for the sole use of The Palmerton Group employees and is not intended for use by firms not participating in the Palmerton Group's training and health and safety programs. Subcontractors are responsible for developing and providing their own safety plans

This site-specific health and safety plan has been prepared to meet the following applicable requirements and guidance:

Applicable Regulations/Guidance

29 CFR 1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER) NIOSH/OSHA/USCG/EPA Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities

Occupational Safety and Health Administration (OSHA 29 CFR 1910 Hazard Communication Standard)

New York State Department of Conservation Draft DER-10 "Technical Guidance for Site Investigation and Remediation"

1.2 SCOPE OF WORK

Description of Work: Excavation of soils in the former UST and drainage ditch areas as described in the IRM Plan.

Equipment/Supplies: As specified in the project work plan.

Task Breakdown: The following table provides descriptions of tasks to be employed to complete this project.

Task Number	Task Description			
1	Establish horizontal dimenions of each excavation			
2	Perform excavations, separating contaminated and non-contaminated soils			
3	Sample soils			
4	Backfill UST excavation			

1.3 Site Description

Site History/Description: The subject property, located at 124 Victory Highway, Painted Post, NY, is composed of one parcel approximately 10 acres in size. Automobile sales and service operations have occurred at this. A Phase II Environmental Site Assessment was performed by Teeter Environmental Services, Inc. (Teeter) in 2006. The report from this ESA is dated March 13, 2006. As discussed in our Site Characterization work plan for the site (Palmerton Group, 2007), there is a concern that petroleum product was released on the site as a result of the Teeter operations. Site Map: A site map is included with this plan as Attachment 1.

Is the site currently in operation? \Box Yes \Box No

Locations of Contamination/Wastes: In the vicinity of former UST, to the east of the building.

Types and Characteristics of Contaminants/Wastes:

\square	Liquid	🔀 Solid	Sludge	\square	Gas/Vapor
\boxtimes	Flammable/Ignitable (<i>potentially</i>)	Volatile	Corrosive		Acutely Toxic
	Explosive	Reactive (<i>potentially</i>)	Carcinogenic (<i>potentially</i>)		Radioactive

2. ORGANIZATION AND RESPONSIBILITIES

The project team, including qualified alternates, is identified below.

Name	Site Role/Responsibility
Dave Palmerton	Project Director (315) 243-2702 - Cell
Matthew Hoskins	Project Manager (315) 657-2709 - Cell
Barry Frey	Project Member (585) 750-3199 - Cell
Richard Cappoza	Attorney Contact (315) 425-2710
John Jahdon	Attorney Contact (315) 642-0675
Jerry Buckley	Site Contact (607) 228-7142 - Cell

3. TRAINING

Prior to field work, all Palmerton Group field personnel shall have received training as indicated below. As applicable, personnel shall have read the project work plan.

Training					
40-Hour OSHA HAZWOPER Initial Training (29 CFR 1910.120)					
Annual HAZWOPER Refresher					
First Aid					
Annual CPR					
Hazard Communication (29 CFR 1910.1200)					
DOT					
DOT Refresher					

4. MEDICAL SURVEILLANCE

4.1 Medical Surveillance Program

Palmerton Group field personnel shall actively participate in the Palmerton Group's medical surveillance program and shall have received, within the past year, an appropriate physical examination. Field personnel should inform the site safety officer (SSO) of any allergies, medical conditions, or similar situations that are relevant to the safe conduct of the work to which this site-specific health and safety plan applies.

4.2 Radiation Exposure

NOT APPLICABLE

5. SITE CONTROL

5.1 Site Layout and Work Zones

Site Map: <u>A site map is included with this plan as Attachment 1.</u>

Site Access Requirements and Special Considerations: <u>Follow standard access protocol</u>. No special considerations <u>anticipated</u>.

Illumination Requirements: Comply with requirements specified in 29 CFR 1910.120 (m).

Sanitary Facilities: Comply with requirements specified in 29 CFR 1910.120 (n).

On-Site Communications: As determined by SSO.

Other Site Control Requirements: No special control requirements anticipated.

5.2 Safe Work Practices

Daily Safety Meeting: <u>An on-site daily safety meeting will be conducted for all Palmerton Group field personnel</u> and documented in the field logbook. The information and data obtained from applicable site characterization work and analysis will be addressed in the safety meetings and also used to update this site-specific health and safety plan, as necessary.

Work Limitations: Work will be conducted in daylight hours.

Weather Limitations: <u>Work shall not be conducted during electrical storms</u>. Work conducted in other inclement weather will be at the discretion of the SSO.

Other Work Limitations: NOT APPLICABLE

Buddy System: Field work shall be conducted in pairs of team members.

Line of Sight: <u>Each field team member shall remain in the line of sight and within verbal communication of at least</u> one other team member.

Eating, Drinking, and Smoking: <u>Eating, drinking, smoking, and the use of tobacco products shall be prohibited in the exclusion and contamination reduction areas, at a minimum, and shall only be permitted in designated areas.</u>

Additional Restrictions: No other restrictions are anticipated.

Contamination Avoidance: Field personnel shall avoid unnecessary contamination of personnel, equipment, and materials to the extent practicable.

Sample Handling: <u>Protective gloves of a type designated in Section 7 shall be worn when containerized samples are handled for labeling, packaging, transportation, and other purposes.</u>

6. HAZARD EVALUATION AND CONTROL

6.1 Physical Hazard Evaluation and Control

Potential physical hazards and their applicable control measures are described in Table 6.1 for each task.

6.2 Chemical Hazard Evaluation and Control

6.2.1 Chemical Hazard Evaluation

Potential chemical hazards are described in Table 6.2 for each task. Material Data Safety Sheets will be available on site in a 3-ring binder

6.2.2 Chemical Hazard Control

An appropriate combination of engineering/administrative controls, work practices, and PPE shall be used to reduce and maintain employee exposures to a level below Occupational Safety and Health Administration (OSHA) permissible exposure levels (PEL's) as listed on Table 6.2.

Applicable Engineering/Administrative Control Measures: <u>None anticipated</u>. <u>Drilling staff will stand upwind of all</u> <u>drilling operations to minimize potential exposure to sub-surface contamination</u>.

Personal Protective Equipment: See Section 7.

6.3 Radiological Hazard Evaluation and Control

Based on Phase 1 background investigation all available documentation for this site was reviewed. Based on this review, past and current activities at this site, no radiological hazards are anticipated during this work.

7. LEVEL OF PROTECTION AND PERSONAL PROTECTIVE EQUIPMENT

The levels of protection have been selected for each work task based on an evaluation of the potential or known hazards, the routes of entry, and the characteristics of the PPE. On-site monitoring results and other information obtained through on-site activities will be used to modify these levels of protection and the PPE, as necessary, to ensure sufficient personnel protection. It is anticipated that most if not all work will be conducted using a modified Level "D" level of protection. The level of protection will increase to protect staff from potential contamination if site conditions change and or if the daily air monitoring being conducted detects airborne contamination that would trigger a upgrade in level of protection to protect staff and ensure regulatory compliance.

Level D personal protective equipment (PPE) for consists of:

- Coveralls/clothing
- Nitrile Gloves as required
- Work gloves (type: leather)
- Steel toe/shank work boots
- Safety glasses
- Hearing protection (available)
- Hard hat
- Face shield

Level C personal protective equipment (PPE) for consists of level D plus the following:

- Full-face APR or PAPR
- Cartridge (type: organic vapor-acid gas)

- Coveralls/clothing
- Protective clothing:
 - Tyvek
- Splash apron
 - Inner gloves:
 - Cotton
 - Nitrile
 - Outer gloves:
 - Viton
 - Rubber
 - Neoprene
 - Nitrile
 - Work gloves:
 - Leather
 - Cotton
- Steel toe/shank neoprene boots/Boot covers (type: PVC)

Modified level C personal protective equipment (PPE) may be used if protection from chemical contamination is required but respiratory protection is net necessary. In such cases protective clothing and appropriate shoe covers can be added to Level D protection. Appropriate decontamination is required where PPE contamination is suspected.

8. ENVIRONMENTAL, HEALTH AND SAFETY MONITORING

8.1 Personnel Monitoring

Health and safety monitoring will be conducted to ensure proper selection of engineering/administrative controls, work practices, and/or PPE so that employees are not exposed to hazardous substances at levels that exceed permissible exposure/dose limits or published exposure levels. Health and safety monitoring shall be conducted using the instruments, frequency, and action levels described in Table 8.1. Health and Safety monitoring shall have appropriately calibrated and/or performance-checked prior to usage on a daily basis and data will be documented in Project log Book maintained by Project Manager

8.2 Community Air Monitoring Program

Per the NYDEC *DER-10 (Draft) Technical Guidance for Site Investigation and Remediation*, December, 2002, Palmerton Group has established this Community Air Monitoring Program (CAMP) for the protection of personnel in the immediate vicinity of activities such as soil boring installation, excavation, or sediment sample collection.

1. For ground-intrusive activities, such as soil boring or monitoring well installation, a program of continuous air monitoring will be implemented. Volatile organic compounds (VOCs) will be monitored at the downwind perimeter of the of the immediate work area or exclusion zone on a continuous basis. If the work is being conducted inside, such as sub-slab soil vapor point installation, the building's heating and cooling system configuration will be taken into consideration when selecting a monitoring location such that the area most likely to collect VOC vapors will be monitored, for example a fresh air intake in the vicinity of the work area.

VOCs will be monitored with a field-calibrated photoionization detector (PID) capable of calculating 15minute running average concentrations.

• If ambient air concentrations of VOCs at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities will be temporarily halted. If instantaneous measurements of total VOC levels indicate a

rapid decrease to VOC concentrations below 5 ppm over background, work activities will be resumed with continued 15-minute averaged monitoring.

- If total VOC levels at the downwind perimeter of the work area of exclusion zone persist at levels in excess of 5 ppm over background, but less than 25 ppm, work activities will be halted and the source of vapors will be identified. Corrective actions will be taken to abate emissions and monitoring will continue. Work activities will resume once total VOC concentrations 200 feet downwind of the work area or exclusion zone or half the distance to the nearest potential receptor or residential / commercial structure, whichever is less, but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the VOC concentration is above 25 ppm at the perimeter of the work area, activities will be shut down.
- 2. For non-ground-intrusive activities, such as sediment sample or groundwater sample collection, periodic monitoring for VOCs will be implemented. This might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a monitoring well cap or overturning soil, monitoring during well purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sample collection at wells on the curb of a busy street or adjacent to a school or residence. VOC concentration guidelines outlined above will be used to determine what appropriate action, if any, is necessary should VOC concentrations rise above background levels.

9. DECONTAMINATION PROCEDURES

All equipment, materials, and personnel will be evaluated for contamination upon leaving the exclusion zone. Equipment and materials will be decontaminated and/or disposed, and personnel will be decontaminated as necessary. Contamination will be conducted in the contamination reduction zone or any designated area so that the exposure of uncontaminated employees, equipment, and materials will be minimized. Specific procedures are described below.

Equipment/Material Decontamination Procedures: As specified in work plan.

Ventilation: <u>All decontamination activity will be conducted in a well-ventilated area.</u>

PPE Requirements for Personnel Performing Decontamination: As described in Section 7.

Personnel Decontamination Procedures: <u>Remove gross contamination, remove PPE, and wash hands with waterless</u> hand cleaner.

Personnel Decontamination in General: Following appropriate decontamination procedures, all field personnel will wash hands and face with soap and potable water. Personnel should shower at the end of each work shift.

Disposition of Disposable PPE: <u>Disposable PPE will be rendered unusable and disposed of in a double bagged</u> garbage bag in an onsite dumpster or as part of the regular garbage disposal at the Palmerton Group office building.

Disposition of Decontamination Wastes (e.g., dry wastes, decontamination fluids, etc.): Dispose as indicated in the work plan.

10. EMERGENCY RESPONSE

This section contains additional information pertaining to on-site emergency response and does not duplicate pertinent emergency response information contained in previous sections of this plan. Emergency response procedures shall be rehearsed regularly, as applicable, during project activities.

10.1 Emergency Responsibilities

All personnel shall be alert to the possibility of an on-site emergency; report potential or actual emergency situations to the team leader and SSO; and notify appropriate emergency resources, as necessary.

The team leader shall determine the emergency actions to be performed by Palmerton Group personnel and shall direct these actions. The team leader also shall ensure that applicable incidents are reported to appropriate Palmerton Group and client personnel and government agencies.

The SSO shall recommend health/safety and protective measures appropriate to the emergency

10.2 Local and Site Resources (including phone numbers)

Ambulance: 911

Hospital: Corning Hospital 607-937-7200 (General) press 1 for Emergency Department

Directions to hospital are included in Attachment 3.

Poison Control: <u>1-800-222-1222</u>

Police Department: 911

Fire Department: 911

Client Contact: Prosper "Cap" D'Aiuto (315) 533-5944 (T&K Realty)

Site Contact: Jerry Buckley 607-962-0560 (office) 607-228-7142 (cell)

Cellular Telephone Number: <u>Matthew Hoskins 315-657-2709</u>

10.3 Palmerton Group Emergency Contacts

Corporate Office: <u>315-463-5300</u>

Dave Palmerton: <u>315-243-2702 (cell)</u>

10.4 Other Emergency Response Procedures

On-Site Evacuation Signal/Alarm: Sound vehicle horn in three activation bursts.

On-Site Assembly Area: Near middle of site on Victory Highway.

Emergency Egress Route to Get Off Site: <u>Determine best route daily depending on where field activity is occurring.</u> <u>Discuss with field crew at daily safety meeting.</u>

Off-Site Assembly Area: SUNOCO parking lot to the east of the property.

Preferred Means of Reporting Emergencies: Cellular phone.

Site Security and Control: <u>In an emergency situation, personnel will attempt to secure the affected area and control site access.</u>

Emergency Decontamination Procedures: <u>Perform gross decontamination and wrap patient to prevent</u> <u>contamination of emergency transportation vehicle.</u>

PPE: <u>Personnel will don appropriate PPE when responding to an emergency situation</u>. The SSO and information provided in Section 7 will provide guidance regarding appropriate PPE.

Emergency Equipment: <u>Appropriate emergency equipment will be available on-site.</u>

•

TABLE 6.1 PHYSICAL HAZARD EVALUATION AND CONTROL

Hazard	Task Number	Hazard Control Measures		
Biological (flora, fauna, etc.) 1, 2, 3, 4, 5 • Potential hazards: Rodents, insects, poisonous plan		• Potential hazards: Rodents, insects, poisonous plants.		
		• Establish site-specific procedures for working around identified hazards.		
Metal debris	1, 2, 3, 4, 5	• Be aware of potential trip hazards.		
		• Avoid contact with exposed metal edges.		
		• Wear appropriate gloves if hand removal of metal debris is required.		
Cold Stress	1, 2, 3, 4, 5	Provide warm break area and adequate breaks.		
		Provide warm non-caffeinated beverages.		
		• Promote cold stress awareness.		
Heat Stress	1, 2, 3, 4, 5	Provide cool break area and adequate breaks.		
		• Provide cool non-caffeinated beverages.		
		• Promote heat stress awareness.		
Electrical	1, 2, 3, 4, 5	• Ensure compliance with 29 CFR 1910 Subparts J and S.		
	, , , , ,	• Locate and mark underground, aboveground, and overhead energized lines.		
		 Deenergize lines, as necessary. 		
		• Utilize lockout and tagout procedures as appropriate.		
		 All electric circuits used on site shall be ground fault circuit interrupter (GFCI) protected. 		
		 Ground all electrical circuits, including electric generator outputs. 		
		 Guard or isolate temporary wiring to prevent accidental contact. 		
• Ins		 Inspect all temporary wiring (i.e., extension cords) prior to usage and frequently throughout the work 		
		shift to ensure safe condition.		
		• Evaluate potential areas of high moisture or standing water and define special electrical needs.		
Fire and Explosion	1, 2, 3, 4, 5	• Inform personnel of the location(s) of potential fire/explosion hazards.		
1	, , , , ,	• Establish site-specific procedures for working around flammables.		
		• Ensure that appropriate fire suppression equipment is available and in good working condition.		
		• Comply with special monitoring needs, as described in Table 8.1.		
		• Remove ignition sources from flammable atmospheres.		
		• Coordinate with local fire department regarding potential fire/explosion situations.		
		• Establish contingency plans and review daily with team members.		
Noise	1, 2, 3, 4, 5	• Establish noise level standards for on-site equipment/operations.		
	7 7 7 7 7 -	 Inform personnel of hearing protection requirements, as specified Section 7. 		
		• Define site-specific requirements for noise monitoring, as described in Table 8.1.		
Overhead Obstructions	1, 2, 3, 4, 5	• Wear hard hat.		
Utility Lines	1, 2, 3, 4, 5	Identify/locate existing utilities prior to initiating field work.		
		 Ensure that overhead, underground, and nearby utilities are at least 25 feet away from work areas. 		
		 Contact utility providers and consult facility "as built" drawings to confirm locations, as necessary. 		

TABLE 6.1 PHYSICAL HAZARD EVALUATION AND CONTROL

Weather Extremes	1, 2, 3, 4, 5	 Potential hazards: heavy rain, snowstorm, high winds. Establish site-specific contingencies for severe weather situations. Monitor weather reports. Weatherize safety equipment, as necessary (e.g., ensure eyewash units cannot freeze). Identify special personnel protective equipment needs. See Section 7. Discontinue work during severe weather. 	
Power Tools	3, 4, 5	• Ensure compliance with 29 CFR 1910 Subpart P.	
Drilling (including "direct push" sampling unit)	3,4	 Inspect drilling equipment to ensure safe condition (e.g., no leaking pressure fittings) and appropriate operation (e.g., proper "kill switch" operation). Restrict entry to drilling work area by establishing appropriate "exclusion zone." Wear appropriate PPE, as described in Section 7. 	

TABLE 6.2 CHEMICAL HAZARD EVALUATION

Task Number	Compound	PEL/TLV (TWA)	Route(s) of Exposure	Acute Symptoms	Odor Threshold/ Description	Photoionozation Detector (PID) Ionization Potential
1, 2, 3, 4	Ethylene glycol	None	inhalation, ingestion,	eye, skin, nose, throat	N/A	N/A
1, 2, 3, 1		rone	contact	irritation; nausea; dizziness	1011	1011
1, 2, 3, 4	Brake fluid	None	inhalation, ingestion, contact	eye, skin, irritation; nausea; dizziness	mild odor	N/A
1, 2, 3, 4	Asbestos (e.g., brake shoes) *	0.1 f/cc	inhalation, ingestion, contact	dyspnea, restricted pulmonary function, eye irritation	N/A	N/A
1, 2, 3, 4	Used oil/filters	5 mg/m ³	inhalation, ingestion, contact	eye, skin, respiratory irritation	slight hydrocarbon odor	N/A
1, 2, 3, 4	Grease	None	inhalation, ingestion, contact	eye, skin, irritation	slight hydrocarbon odor	N/A
1, 2, 3, 4	Freon (* Freon 10® only)	100 ppm	inhalation, ingestion, skin and/or eye contact	eye, skin, nose irritation; dyspnea; dizziness	odorless to ether- like	11.07 - 12.96 eV
1, 2, 3, 4	Diesel/gasoline fuel	None	inhalation, ingestion, skin and/or eye contact	eye, skin, nose, throat irritation; headache; nausea; dizziness	characteristic odor	N/A
1, 2, 3, 4	Isopropanol	400 ppm	inhalation, ingestion, skin and/or eye contact	eye, skin, nose, throat irritation; headache; drowsiness; dizziness	odor of rubbing alcohol	10.10 eV
1, 2, 3, 4	Lead	0.050 mg/m ³	inhalation, ingestion, skin and/or eye contact	Lassitude, insomnia; constipation, abdominal pain, tremor	N/A	N/A
1, 2, 3, 4	Sulfuric acid	1 mg/m ³	inhalation, ingestion, skin and/or eye contact	eye, skin, nose, throat irritation; pulmonary edema; dermatitis	odorless	N/A
1, 2, 3, 4	Organic solvents (paints, cleaning agents)	100 ppm	inhalation, ingestion, skin and/or eye contact	eye, skin, nose, throat irritation; drowsiness	aromatic	8.44 – 9.96 eV
1, 2, 3, 4	Naptha	100 ppm	inhalation, ingestion, skin and/or eye contact	eye, skin, nose irritation; dizziness; drowsiness; dermatitis	aromatic	N/A
1, 2, 3, 4	Mineral spirits	500 ppm	inhalation, ingestion, skin and/or eye contact	eye, nose, throat irritation; dizziness; dermatitis	kerosene-like	N/A
2,3,4	1,2 dichlorobenxene/toluene	50 ppm	inhalation, ingestion, skin and/or eye contact	eye, nose, throat irritation; dizziness; dermatitis	Aromatic	9.07 eV

NOTE: An asterisk (*) indicates a known or suspected carcinogen.

TABLE 8.1 HEALTH AND SAFETY MONITORING

Instrument	Task Number	Contaminant(s)	Monitoring Location	Monitoring Frequency	Action	Levels ^a
PID	1, 2, 3, 4, 5	Freon, isoproponal, organic solvents	Breathing zone	Continuous	UnknownVapors Background to 1 ppm: Level D 1 to 5 ppm above background: Level C 5 to 500 ppm above background: Level B >500 ppm above background: Level A	Contaminant-Specifc
Oxygen Meter/Explosimeter	3, 4, 5	Diesel/gasoline fuel, isopropanol, organic	Breathing zone	Continuous	Oxygen <19.5% or >25.0%.	Explosivity <10% LEL. Continue
ľ	3,4	solvents, naptha, mineral spirits	Bore hole	During drilling operations	Evacuate area; eliminate ignition sources; reassess conditions.	work in accoprdance with action levels for other instruments; monitor
	5		Monitoring well	Prior to collecting samples	19.5 to 25.0%. Continue work in accordance with action levels for each instrument	continuously for combustible atmospheres. >10% LEL. Evacuate area; eliminate ignition sources; reassess conditions.

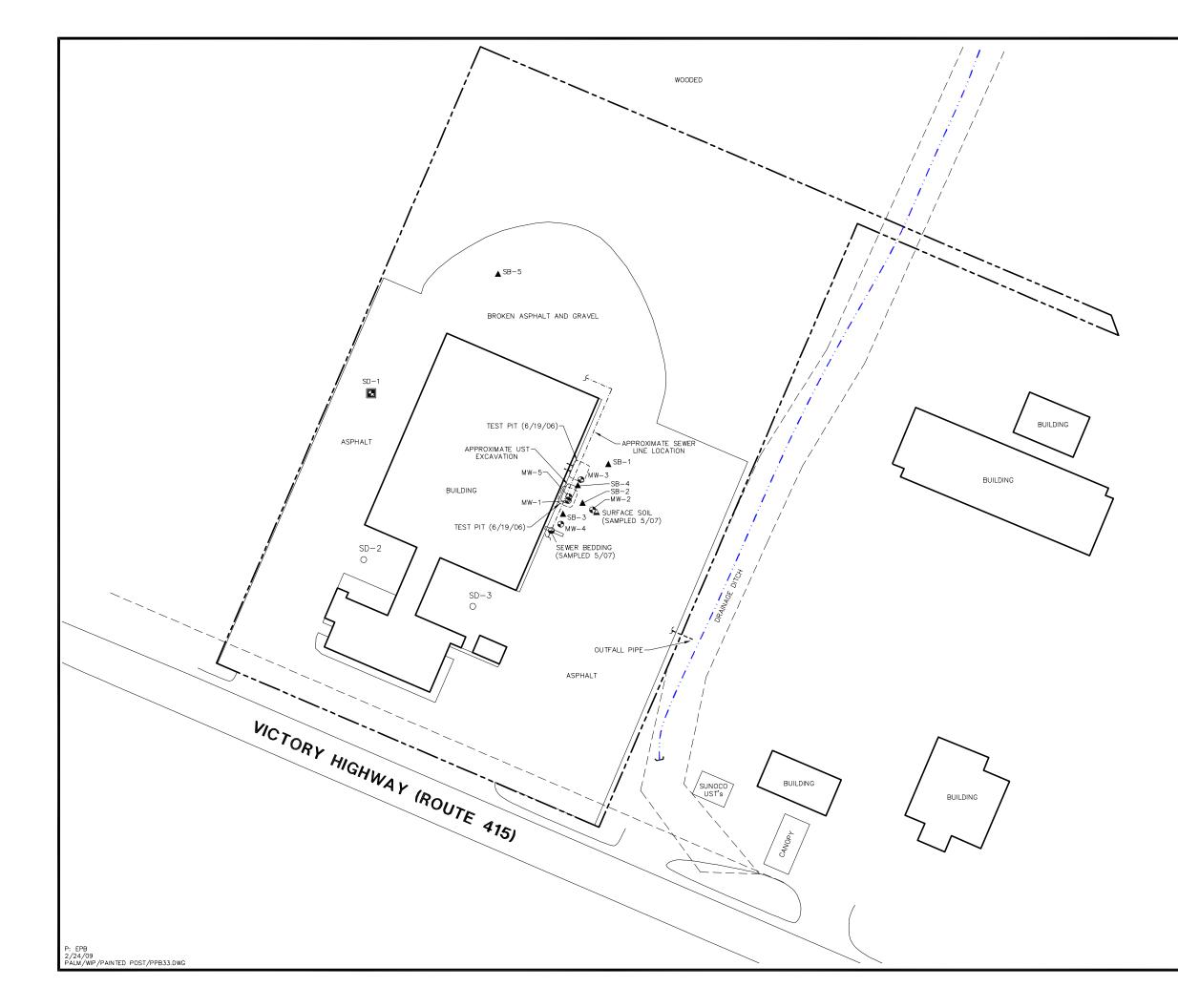
^a Unless stated otherwise, airborne contaminant concentrations are measured as a time-weighted average in the worker's breathing zone. Acceptable concentrations for known airborne contaminants will be determined based on OSHA/ACGIH. Exposure limits.

TABLE 8.2 COMMUNITY AIR MONITORING PROGRAM

	Task			Monitoring	
Instrument	Number	Contaminant(s)	Monitoring Location	Frequency	Action Levels
PID	3, 4	Volatile Organic Compounds (VOCs)	a. Upwind (UW) and Downwind (DW) points at Exclusion Zone Perimeter	Continuous	 VOCs (15 min. avg.) a. DW = UW +25 PPM Shutdown operations DW reading = UW +5-25 PPM Suspend work activities temporarily. If DW monitoring drops rapidly to < 5 UW+PPM resume operations.
			b. 200 ft. Up and Down Wind, or ¹ / ₂ way to nearest exposed individual or structure (not less than 20')		b. If not, halt operations, identify and correct sources.Shift Monitoring Equipment to Location b. Resume operations if DW at b. is UW+<5PPM
Thermo Anderson PM-10 Sampler	3,4	PM 10 Particulates	Upwind (UW) and Downwind (DW) points at Exclusion Zone Perimeter	Continuous	PM 10 Particulates DW=UW + 100-150 mcg/m ³ or visible dust leaving work zone Suspend work and implement dust control measures. Work resume if DW= <uw +150<br="">mcg/m³ and no visible dust is leaving work zone</uw>
PID	5	Volatile Organic Compounds (VOCs)	Monitor at Sampling Location	Periodic- Arrival, Opening Well, Sampling, Prior to leaving.	VOCs 5 PPM sample in accordance to PID for Tasks 3, 4.

ATTACHMENT 1

SITE MAP





<u>LEGEND:</u>

----- APPROXIMATE PROPERTY LINE

---- EASEMENT

SD-1 O SURFACE DRAIN

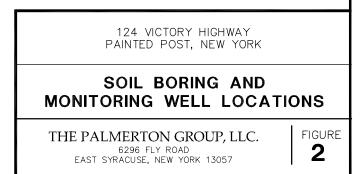
- MONITORING WELL
- SEWER BEDDING MATERIAL SAMPLE LOCATION
- ▲ SURFACE SOIL SAMPLE LOCATION
- ▲ SOIL BORING LOCATION
- STORM DRAIN SAMPLE LOCATION

NOTES:

- BASE MAP DIGITIZED FROM NYSGIS CLEARINGHOUSE 2002 AERIAL PHOTOGRAPH; FROM TEETER ENVIRONMENTAL SERVICES FIGURE ENTITLED "SITE MAP", DATED 10/25/06; AND FROM PHOTOCOPY OF SITE SURVEYS BY JAMES D. EVANS, DATED 4/21/06 AND 9/18/08.
- 2. ALL LOCATIONS ARE APPROXIMATE.

0	80'	160'

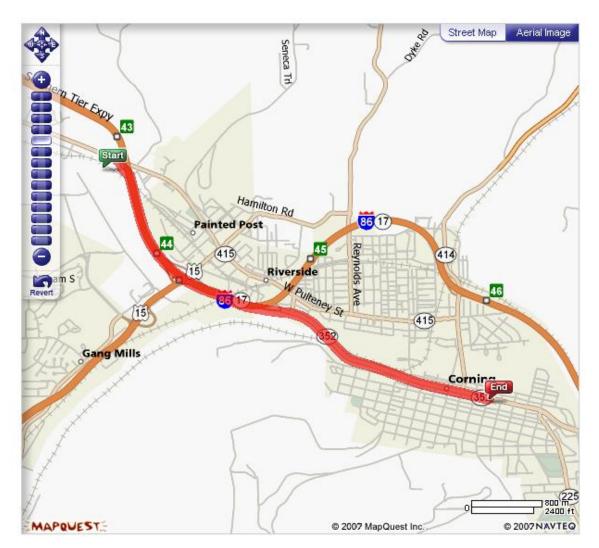
GRAPHIC SCALE



ATTACHMENT 2

HOSPITAL ROUTE DIRECTIONS/MAP

Map to Corning Hospital



Directions:

1: Start out going EAST on NY-415 / COOPERS-BATH RD. <0.1 miles

2: Merge onto I-86 E / NY-17 E / SOUTHERN TIER EXPY. 1.7 miles

3: Take the RT-352 exit- EXIT 45- toward RIVERSIDE / DOWNTOWN CORNING. 0.2 miles

4: Merge onto NY-352 E. 1.8 miles

^{END} 5: End at **Corning Hospital:** 176 Denison Pkwy E, Corning, NY 14830, US