

CONTRACT #D008535

Date: Wednesday June 25, 2014

Project Field Order #1

Based on analytical results from confirmation sampling at the two “spot” excavations and waste characterization sampling within the pond the Contractor, Horizon Environmental Services (HES) has been requested to complete the following:

- Complete waste characterization (WC) sampling (Identification e.g. AS-CHAR-14-0001) within the limits of the pond (below waterline approx. EL. 628ft) at a frequency to meet landfill requirements; (one composite WC sample will be used to delineate one grid). Use WC samples collected to date as applicable to delineate grids.
- Transport and disposal of hazardous and non-hazardous material as delineated by WC samples in accordance with the Contract Documents.
- Remove additional soils along the east side of the Site near the “spot” excavations; Spot Excavation #1 (located where confirmatory samples AS-CONF-14-0003 and AS-CONF-14-0004 were collected) and Spot Excavation #2 (located where confirmatory samples AS-CONF-14-0001 and AS-CONF-14-0002 were collected). Two hazardous (TSCA) and two non-hazardous areas have been delineated and shall be excavated to a total depth of 3 feet below the original ground surface to the fence line bordering Specialty Metals. Transport and dispose of material of in accordance with procedures described in the Contract Documents. Confirmation samples shall be collected and analyzed in accordance with Contract Documents. Locations shall be approved by the Project Field Engineer and or Department. Excavation areas are shown on the attached figure for reference. The extent of the lateral excavation boundaries shown on the figure shall be determined and the field and approved by the Engineer.
- Decontamination procedures shall be completed and followed in accordance with the Contract Documents.

Issued By: Matt Sausville P.E. for NYSDEC

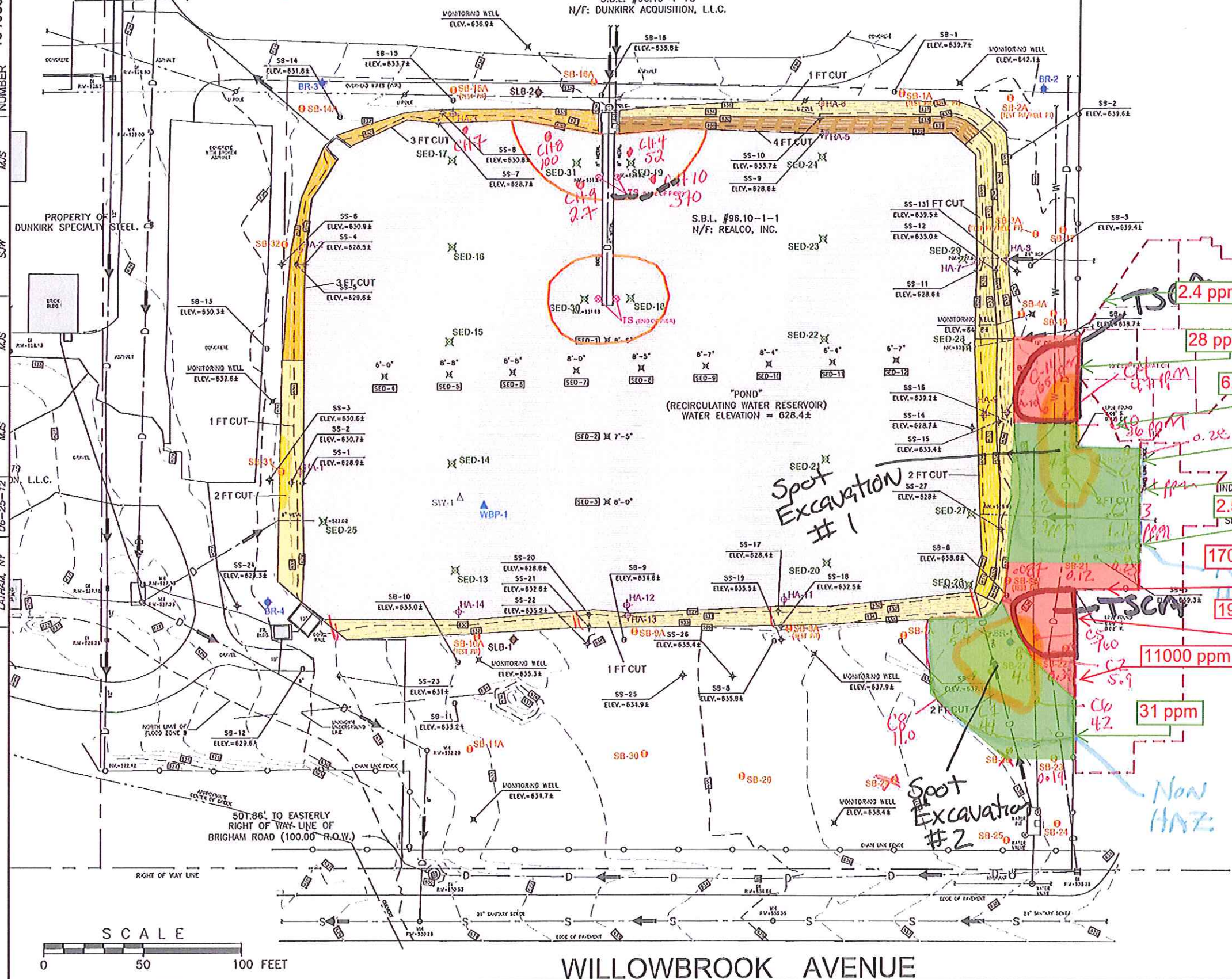
A handwritten signature in blue ink, appearing to read "Matt Sausville".

Project Engineer

Cc: Dave Chiusano – NYSDEC Project Manager
Maurice Moore – NYSDEC Site Project Manager
John Whalen – CB&I Field Engineer

OFFICE: LATHAM, NY
 DATE: 06-25-12
 DESIGNED BY: MJS
 DRAWN BY: MJS
 CHECKED BY: SJW
 APPROVED BY: MJS
 DRAWING NUMBER: 134685-22B19

* Collect Waste Characterization Samples across Sidebanks and in areas needed in pond sludge per min freq. of Landfill 3 750 tons



- LEGEND:**
- SS-9 (●) SURFACE SOIL SAMPLE LOCATION (JULY 2011)
 - SB-2 (●) SOIL BORING LOCATION (JULY 2011)
 - SED-12 (X) SEDIMENT SAMPLE LOCATION (JULY 2011) AND DEPTH BELOW WATER SURFACE TO TOP OF SAMPLE
 - SW-1 (Δ) SURFACE WATER SAMPLE LOCATION (JULY 2011)
 - MW-2 (X) MONITORING WELL
 - HA-2 (●) HISTORIC SAMPLE POINT
 - SB-2A (●) SOIL SAMPLE OR TEST PIT LOCATION (MAY 2012)
 - HA-9 (●) SIDE BANK SAMPLE LOCATION (MAY 2012)
 - SED-23 (X) SEDIMENT SAMPLE LOCATION (MAY 2012)
 - SLB-1 (●) SLAG BERM SAMPLE LOCATION (MAY 2012)
 - WBP-1 (Δ) SURFACE WATER SAMPLE LOCATION (MAY 2012)
 - BR-2 (X) BEDROCK MONITORING WELL (MAY 2012)
 - TS (●) TREATABILITY STUDY SAMPLE LOCATION (MAY 2012)
 - APPROXIMATE PERIMETER OF SLUDGE PILE
 - LIMITS OF SEDIMENT REMOVAL

C4 - Sample ID - cont
 47 - ppm
 C1+8 - Sample ID waste char

- NOTES:**
- MAY 2012 SAMPLE LOCATIONS ARE APPROXIMATE. BASED ON TRIMBLE GPS SURVEY (05-22-2012).
 - PERIMETER SLAG BERM SURROUNDING THE POND IS RECOMMENDED TO BE REMOVED AND DISPOSED OF AT AN OFFSITE FACILITY. THE APPROXIMATE LOCATION IS SHOWN BY SLB-1 AND SLB-2.

Shaw Shaw Environmental, Inc.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 PROJECT NO. 134685-22

FIGURE 10 - DELINEATION OF EXTENTS OF RECOMMENDED REMEDIAL ACTION MAY 2012 SAMPLING EVENT
 ALTECH SPECIALTY STEEL - WILLOWBROOK POND
 DUNKIRK, NEW YORK

File: \\Project\134685\22B19\05-22-2012\05-22-2012.dwg
 Plot Date/Time: 06/25/2012 10:00:00
 Plotter: Shaw Environmental
 Plot Size: 11x17

AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Thursday July 17, 2014

Project Field Order #2

Based on landfill requirements the Willowbrook Pond sediments being removed for disposal will require solidification prior to leaving the site. PCO #2 will be issued to formally amend the Contract incorporating these changes. In the interim to continue progress with field operations at the site, this field order is being issued to direct Horizon Environmental Services (HES) to begin onsite solidification, transportation and disposal of the pond sediments. The solidification process that takes place before PCO #2 is issued will follow the means and methods as discussed with HES and CB&I representatives, and are subject to modification based on the issuance of PCO #2.

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Project Engineer

Cc: Dave Chiusano – NYSDEC Project Manager
Maurice Moore – NYSDEC Site Project Manager
John Whalen – CB&I Field Engineer

AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Tuesday July 22, 2014

Project Field Order #3

This Field Order is being issued to direct Horizon Environmental Services (HES) to perform a solidification test on the Willowbrook Pond sediments using soils from the site slated for offsite disposal. It has been determined by CB&I that there may be a significant cost savings using the pond bank and spot excavation soils as an amendment to the sediment for solidification. HES by direction of CB&I's onsite representative will section off a known quantity of pond sediment within the pond area and mix with a field determined quantity of bank soils at a 2:1 ratio (sediment to soil) to achieve stabilization. The location of bank soils used for the amendment will be determined based HES means and methods and existing staging location of sediments. The results will be used to determine if the stabilized sediments meet the landfill's stability criteria. The cost for this work will be included in PCO #2.

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AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Thursday July 31, 2014

Project Field Order #4

This Field Order is being issued to direct Horizon Environmental Services (HES) to excavate three testpits north of the North Spot Excavation area. Due to the North sidewall failing to meet clean-up criteria additional removal will be required. In order to establish the re-excavation boundaries 3 test pit trenches spaced approximately 20 feet apart, 3 feet deep will be excavated to the north of the North spot excavation area. The trenches will extend from the fenceline to within 3 feet of the top of slope of the pond. One composite sidewall sample will be collected from the north face of each trench.

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Maurice Moore – NYSDEC Site Project Field Representative
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AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Tuesday October 21, 2014

Project Field Order #5

This Field Order is being issued to direct Horizon Environmental Services (HES) to continue excavation along pond bank and pond perimeter areas which exhibited confirmation sampling analytical failures. Along pond side banks and pond perimeter excavation bottom areas where confirmation sample analytical results exceeded the recommended soil cleanup objective (RSCO) of one (1) part per million (ppm) for polychlorinated biphenyls (PCBs) HES shall excavate an additional one (1) vertical foot . Upon reaching those limits, HES shall resample the pond side bank as described in the Contract Documents. Along pond perimeter excavation areas where confirmation sample analytical results exceeded the RSCO of one (1) ppm) for PCBs, HES shall excavate an additional 15 horizontal feet outward and excavated to the vertical depth of the existing excavated area. Upon reaching those limits, HES shall resample the excavation bottom and sidewalls as described in the Contract Documents. Prior to any additional excavation, the limits will be marked out in the field by HES and approved by the CB&I Field Engineer. During all additional excavation activities, HES will follow the direction of the Field Engineer. All samples will be collected and reported in accordance with the Contract Documents. All other elements of the work shall be completed in accordance with Contract Documents, the HES approved work plan and as directed by the CB&I Field Engineer. HES shall ensure utilities in the excavation area are clearly marked out and avoided while digging with heavy equipment. Confirmatory sample locations and results are provided on Attachment 1.

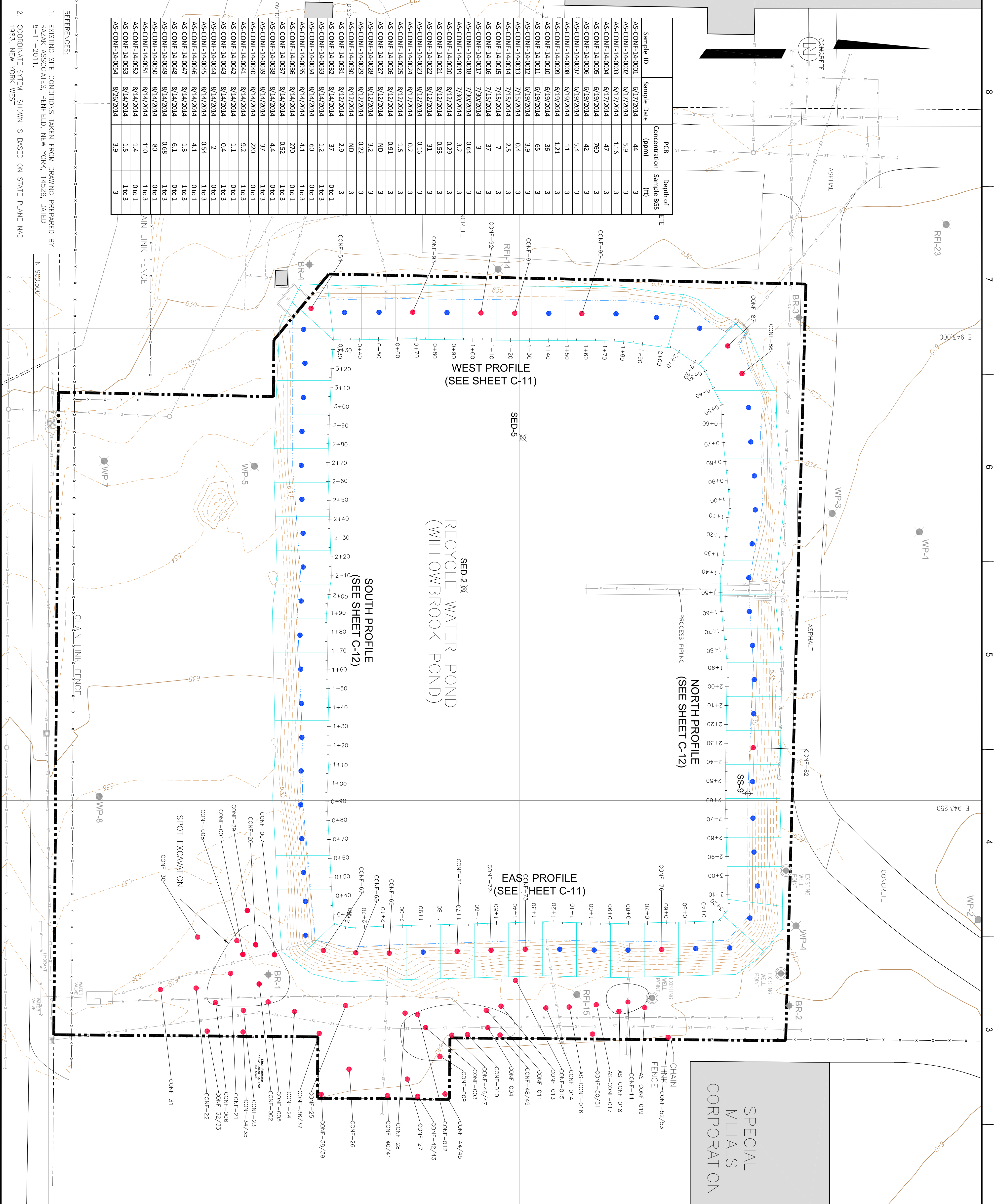
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Project Engineer

Cc: Dave Chiusano – NYSDEC Project Manager
Maurice Moore – NYSDEC Site Project Field Representative
John Moyer – CB&I Field Engineer

Attachments: Attachment 1 – Confirmatory Sample Results Map



LEGEND:

- CONFIRMATORY SAMPLE LOCATION
- PROPOSED CONFIRMATORY SAMPLE LOCATION
- PROPOSED BEDROCK CONFIRMATION SAMPLE

NOTES:

- FOR GENERAL LEGEND SEE SHEET C-1.
- CONFIRMATORY SAMPLE GRIDS SHALL BE LIMITED TO ENCOMPASS A MAXIMUM AREA OF 625 SF.
- REFER TO DRAWING C-4 FOR EXCAVATION PLAN.

DESIGNED BY:
J. WHALEN

DRAWN BY:
S. WALSH

CHECKED BY:
M. Sausville

APPROVED BY:
M. Sausville

NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL
CONSERVATION

CONFIRMATORY SAMPLING PLAN
ALTECH SPECIALTY STEEL
CONTRACT NO. D008535
DUNKIRK, NEW YORK

DATE:
10/01/14

SCALE:
AS SHOWN

DRAWING NO.
134685-22D9

SHEET NO.
C-10

0 25 50 75 FEET

S C A L E

AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Wednesday December 3, 2014

Project Field Order #6

This Field Order is being issued to direct Horizon Environmental Services (HES) to reduce treatment of pond groundwater to bag filtration only. Batch discharge and carbon treatment may be discontinued provided that sample results do not report exceedances for the NYSDEC August 28, 2013 Memorandum of Understanding (MOU) for groundwater criteria and as indicated in the Contract Documents. Pond groundwater may be directly discharge to Willowbrook Creek as discussed in November 06, 2014 Site meeting. The pond water shall be monitored for turbidity and sampled in accordance with the Contract Documents or as directed by the Engineer. If sample results indicate MOU exceedances or turbidity measurements are exceeding 50 ntu, alternative water treatment measures shall be evaluated and implemented as directed by the Engineer/Department.

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Project Engineer

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AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Wednesday December 3, 2014

Project Field Order #7

This Field Order is being issued to direct Horizon Environmental Services (HES) to reduce the amount of backfill sampling from the required amount of samples indicated in the Contract Documents in accordance with Division of Environmental Remediation (DER) – 10 guidance to the following frequency:

- 0-1000 yards collect 4 samples (1 per 250 cubic yards)
- 1000-5000 yards collect 4 additional samples (1 per 1000 cubic yards)
- Per each additional 5000 yards collect 1 sample (5000-10000 cubic yards collect 1 sample), (10,000-15,000 cubic yards collect 1 sample), (15,000-20,000 cubic yards collect 1 sample) (20,000 – 25,000 cubic yards collect 1 sample), etc.

One sample (1 sample) indicates one complete sample set including any quality assurance/quality control samples as required by the Contract Documents. The revised sampling frequency is based on field discussions between the New York State Department of Environmental Conservation (Department), HES and CBI on December 03, 2014.

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Project Engineer

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Maurice Moore – NYSDEC Site Project Field Representative
John Moyer – CB&I Field Engineer

AlTech Specialty Steel OU2A Site, Site Number: 907022
CONTRACT #D008535

Date: Thursday December 18, 2014

Project Field Order #8

This Field Order is being issued to direct Horizon Environmental Services (HES) to waive the required backfill compaction testing as described in the Contract Documents. Execution, placement and compaction techniques will remain the same as described in the Contract Documents. This Field Order is based on discussions held during the Site meeting on December 10, 2014. The Engineer/Department reserves the right to re-instate compaction testing as field work and backfill operations progress.

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John Moyer – CB&I Field Engineer