GZA GeoEnvironmental
of New York

Engineers and Scientists

May 4, 2007
File No. 21.0056196.20

Mr. Eugene Melnyk
NYSDEC Region 9
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, New York 14203

Re: RI-FS Work Plan Addendum
Special Metals Corporation
100 Willowbrook Avenue
Dunkirk, New York
Site # 907031
Order on Consent and Administrative Settlement (Index# B9-0737-07-02)

364 Nagel Drive
Buffalo
New York
14225
716-685-2300
Fax: 716-685-3629
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Dear Mr. Melnyk:

On behalf of Special Metals Corporation (SMC), GZA submitted to you on March 23, 2007, the RI/FS Work Plan that is required under the referenced Order. Following the submittal, the SMC project team met with you on April 4 to review its desire to expand the scope of the NYSDEC-approved IRM to include additional excavation of PCB-impacted soil based on the results of a supplemental subsurface investigation conducted at the SMC facility between March 15 and 19, 2007.

In your follow-up April 5 letter to the SMC project team, you indicated that it was prudent to expand the scope of work to include the excavation of the additional areas and noted that the expansion of the Area of Concern (AOC) would require an amendment to the previously submitted RI/FS Work Plan. This Addendum serves as the required amendment to the RI/FS Work Plan.

The revised AOC (see Figure 1) and additional areas to be addressed as part of the IRM were defined in our IRM Addendum letter to NYSDEC dated April 6, 2007. The IRM Addendum was approved by NYSDEC in your April 16, 2007 letter to SMC.

We propose to modify the monitoring well locations proposed in the RI/FS Work Plan to cover the expanded AOC as shown in the attached Figure 1. The monitoring wells would be installed as proposed in the RI/FS Work Plan at the revised locations.

Due to the elevated concentration of PCBs detected (12 parts per million (ppm)) in the drainage swale along Willowbrook Avenue during the supplemental subsurface investigation (see sample location SS-1), soil in the drainage swale was excavated as part of the IRM work. An area approximately 10 foot long by 2 foot wide and 8-inches deep was excavated near SS-1 and a composite sample was collected from the bottom of the

excavated area and analyzed for PCBs. The results of the composite sample from the swale indicated that PCBs were not detected above method detection limits.

A sediment sample was also collected from a downstream catch basin (approximately 120 feet from drainage swale sample location SS-1) located to the west, which receives storm water from the drainage swale (see Figure 1). The analytical sample results indicated that PCBs were present at a concentration of 0.230 ppm. Copies of the analytical reports from these two sampling results are enclosed.

Although the apparent limits of PCB contamination in the swale area have been determined in a westerly direction, two surface soil samples are proposed to be collected at the locations shown on Figure 1 to delineate potential PCB contamination to the east of the SS-1 location.

Please do not hesitate to contact the undersigned if you have any questions or require any additional information.

Sincerely,

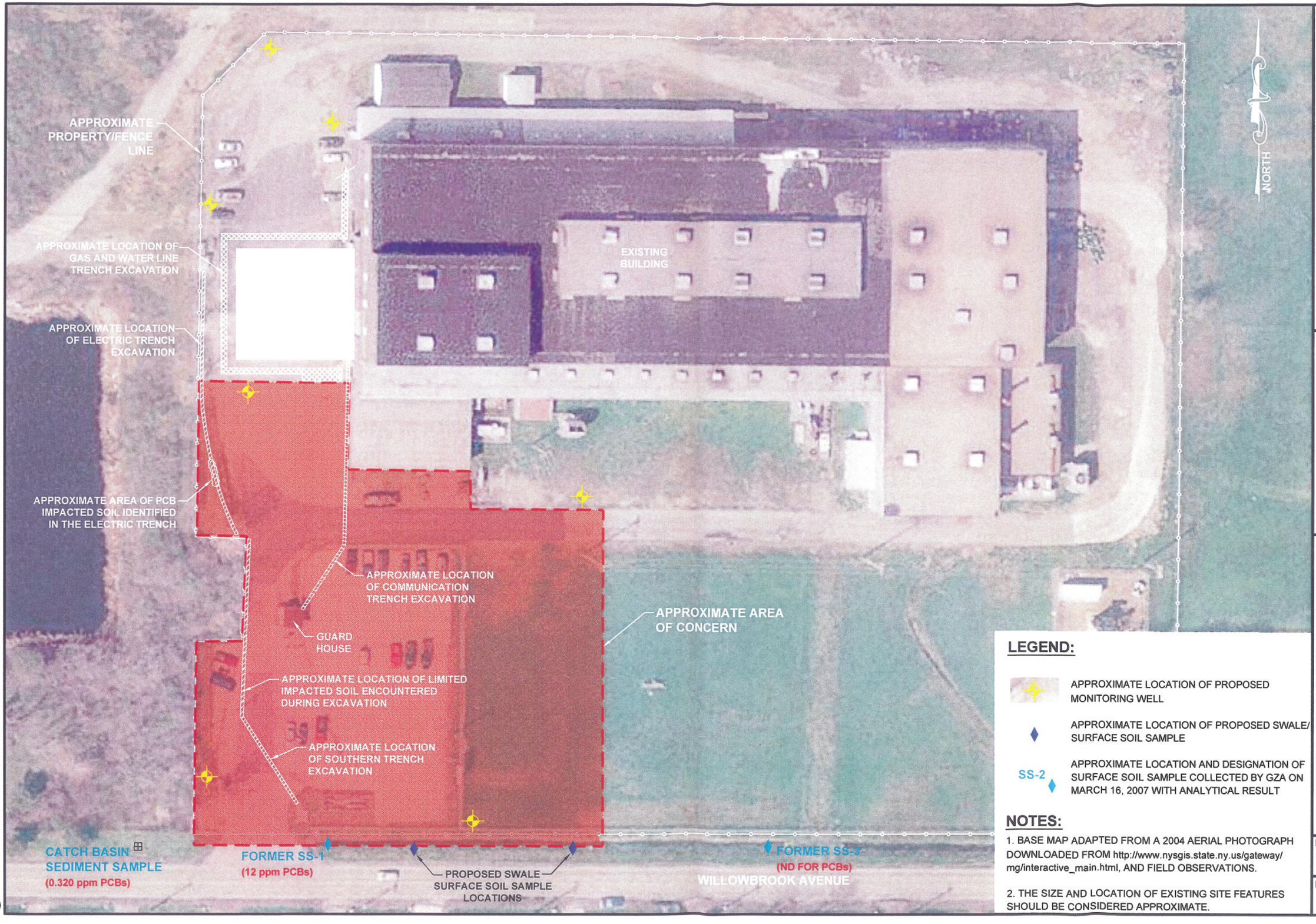
GZA GEOENVIRONMENTAL OF NEW YORK

Christopher Boron
Project Manager

Ernest R. Hanna, P.E.
Principal

Attachments: Figure 1 and lab data from sediment sampling

cc: Mr. Martin Doster (NYSDEC)
Mr. Joseph J. Hausbeck, Esq. (NYSDEC)
Mr. Gary Litwin (NYSDOH)
Mr. Dave Murray (PCC) – electronic version
Mr. Robert DiFondi (SMC) – electronic version
Mr. Barry Kogut (BS&K) – electronic version



DRAWN BY: DEW

DATE: APRIL 2007

GZA GeoEnvironmental of New York

APPROXIMATE SCALE IN FEET

0 30 60 120

SPECIAL METALS CORPORATION
DUNKIRK FACILITY
100 WILLOWBROOK AVENUE
DUNKIRK, NEW YORK
IRM ADDENDUM LETTER
OVERALL SITE PLAN AND REVISED AREA OF CONCERN

PROJECT No.
21.0056196.20

FIGURE No.
1

FORM 1
PCB ORGANICS ANALYSIS DATA SHEET

CLIENT SAMPLE NO.

SS-1

Lab Name: MITKEM CORPORATION Contract:

Lab Code: MITKEM Case No.: SAS No.: SDG No.: MF0338

Matrix: (soil/water) SOIL Lab Sample ID: F0338-21A

Sample wt/vol: 30.1 (g/mL) G Lab File ID: E2G0847F

% Moisture: 59 decanted: (Y/N) N Date Received: 03/17/07

Extraction: (SepF/Cont/Sonc) SONC Date Extracted: 03/21/07

Concentrated Extract Volume: 10000 (uL) Date Analyzed: 03/27/07

Injection Volume: 1.0 (uL) Dilution Factor: 20.0

GPC Cleanup: (Y/N) N pH: ___ Sulfur Cleanup: (Y/N) Y

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q
12674-11-2	Aroclor-1016	1600	U
11104-28-2	Aroclor-1221	1600	U
11141-16-5	Aroclor-1232	1600	U
53469-21-9	Aroclor-1242	1600	U
12672-29-6	Aroclor-1248	12000	
11097-69-1	Aroclor-1254	1600	U
11096-82-5	Aroclor-1260	1600	U

Date: 04/12/2007
Time: 16:36:48

GZA Geo Environmentalof New York -
Special Metals - Dunkirk, NY
MED LEVEL METHOD 8082 - POLYCHLORINATED BIPHENYLS

Rept: AN0326

Client ID		EX-1-FL-2		SW OFFSITE CB					
Job No	Lab ID	A07-3589	A7358902	A07-3589	A7358901				
Sample Date		04/11/2007		04/11/2007					
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Aroclor 1016	UG/KG	ND	250	ND	290	NA		NA	
Aroclor 1221	UG/KG	ND	250	ND	290	NA		NA	
Aroclor 1232	UG/KG	ND	250	ND	290	NA		NA	
Aroclor 1242	UG/KG	ND	250	ND	290	NA		NA	
Aroclor 1248	UG/KG	ND	250	230 J	290	NA		NA	
Aroclor 1254	UG/KG	ND	250	ND	290	NA		NA	
Aroclor 1260	UG/KG	ND	250	ND	290	NA		NA	
SURROGATE(S)									
Tetrachloro-m-xylene	%	103	35-134	104	35-134	NA		NA	
Decachlorobiphenyl	%	100	34-148	98	34-148	NA		NA	

NA = Not Applicable ND = Not Detected

STL Buffalo