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**PHASE II
SURFACE WATER INVESTIGATION**

**Buffalo Plant
November 1984**

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1.0 INTRODUCTION

In the fall of 1982, Advanced Environmental Systems, Inc. and Conestoga-Rovers & Associates Limited undertook a hydrogeologic investigation at the Dunlop Tire & Rubber Corporation Plant in Buffalo, New York. The results of this study were presented in the report entitled, "Investigation of Inactive Waste Disposal Sites - October 3, 1983" which was subsequently submitted to the New York State Department of Environmental Conservation for review. In response to questions from the State, clarification statements regarding the report were prepared and submitted in June 1984.

The investigation concluded that the inactive disposal sites have had minimal impact on the subsurface hydrogeologic environment of the area. The report further concluded that if a problem existed, it would most likely be related to surface water contact with fill materials.

The purpose of this report is to present a surface water sampling program designed to determine surface water quality adjacent to the former disposal areas.

2.0 SAMPLING LOCATIONS

Since the purpose of this program is to determine the impact of the disposal areas on surface water quality, only those areas where waste has been identified will be investigated. The effluent from the Oil and Floating Object Trapping Pond is not considered appropriate as the possibility of interference from activities other than the waste disposal areas are likely to predominate findings from this area. The most logical sampling locations are those areas in which surface water accumulation is immediately adjacent to the identified fill material. In order to satisfy this observation, eight (8) surface water sampling stations have been selected, the locations of which are presented in Figure 1.

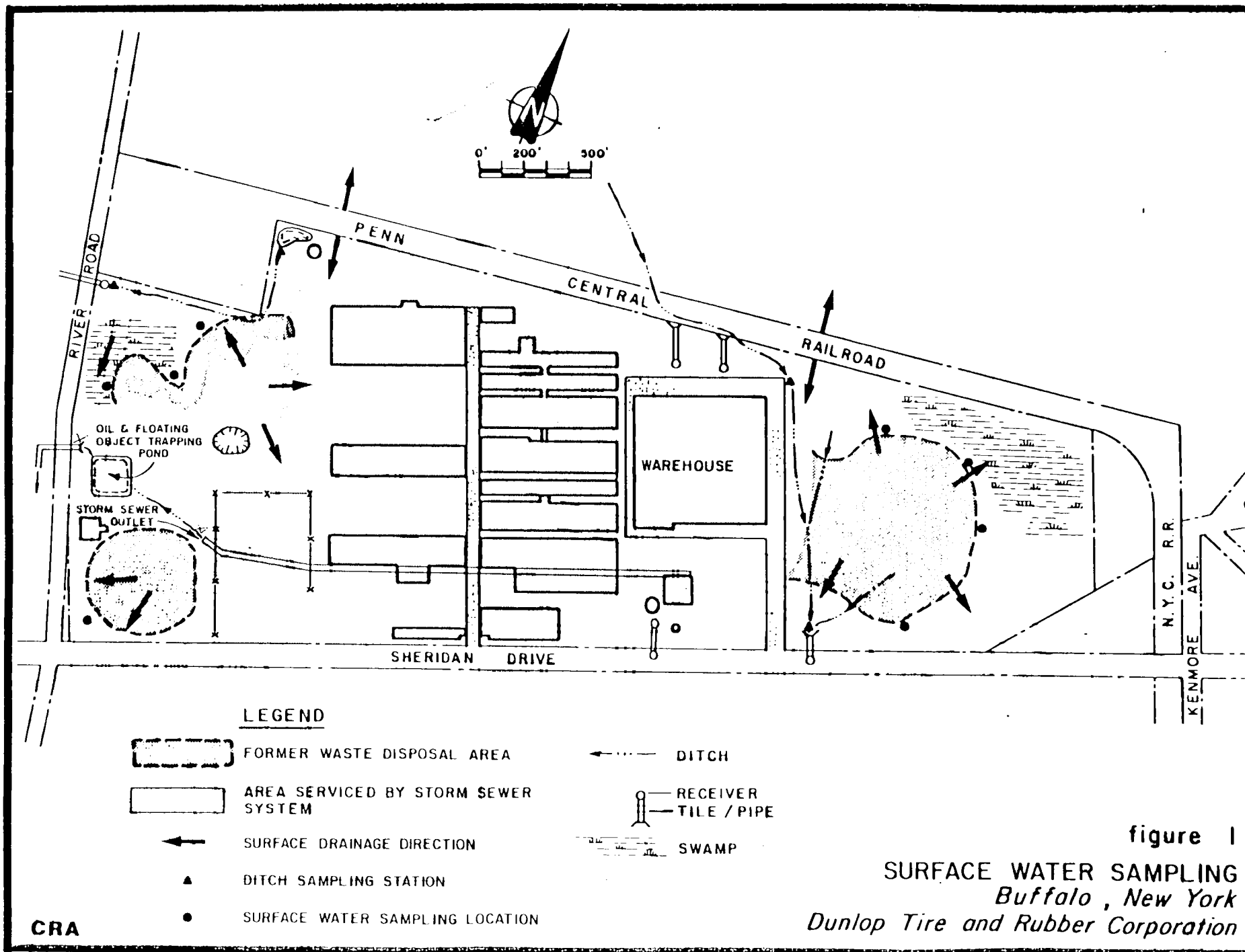


figure 1
 SURFACE WATER SAMPLING
 Buffalo, New York
 Dunlop Tire and Rubber Corporation

CRA

3.0 SAMPLING PROTOCOL

At each selected sampling station, surface water samples will be collected on two separate occasions. The first set will be collected during or immediately following a storm event. The second sample round will be taken during a drier period when surface water conditions are relatively stable. This will permit comparison of the effect, if any, of soil erosion from the fill material and longer term water contact with wastes.

The samples, where possible, will be collected directly into prepared sample bottles.

4.0 REQUIRED ANALYSIS

Each sample will be analyzed for the same parameters reported in the hydrogeologic investigation;

chloroform

carbon tetrachloride

trichloroethylene

tetrachloroethylene

total phenols

Based on the analytical results, a determination will be made as to the need, if any, for additional sampling.

5.0 SCHEDULE

The proposed schedule for the completion of this program is subject to climatic conditions. Should freezing conditions persist following approval of this program, it may be necessary to delay the sample collection until spring or until a warmer weather trend develops.

The proposed schedule is as follows:

Item Description	Week #												
	1	2	3	4	5	6	7	8	9	10	11	12	
Program Submission	█												
State Approval	█	█											
Budget Approval			█	█	█								
Sample Collection					█	█							
Chemical Analysis						█	█	█	█	█	█		
Final Report					█	█				█	█	█	█

All of Which is Respectfully Submitted,

ADVANCED ENVIRONMENTAL SYSTEMS, INC.

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