



November 1, 2011

Ms. Laura Surdej
Erie County Department of Environment & Planning
Southtowns Sewage Treatment Plant
S-3690 Lakeshore Blvd.
Buffalo, New York 14219

RE: Fourth Quarter 2011 Discharge Monitoring Report
Scott Technologies, Inc., Groundwater Remediation Site
NYSDEC Site 9-15-149
EC/BPDES Permit No. 11-03-E4045

Dear Ms. Surdej:

Scott Technologies, Inc. is pleased to provide you with the Fourth Quarter 2011 Discharge Monitoring Report (DMR) for the Scott Technologies, Inc., Groundwater Remediation Site located at AVOX Systems Inc., 25A Walter Winter Drive, Lancaster, New York. The information in this letter is submitted in partial fulfillment of Erie County/Buffalo Pollution Discharge Elimination System (EC/BPDES) Permit No. 11-03-E4045, effective April 1, 2011. Scott Technologies, Inc. commissioned AECOM, with an office located in Amherst, New York, to perform the required EC/BPDES quarterly sampling during the month of October 2011.

As approved by New York State Department of Environmental Conservation (NYSDEC) in a letter to Tyco Fire Protection dated May 27, 2011 (see attached), the dual phase extraction system and groundwater collection trench were temporarily shut off following the second quarter 2011 discharge monitoring event to facilitate a second phase of the chemical oxidation injection pilot test. As a result of the remedial systems being temporarily shut off, there was no discharge of groundwater to the EC/BPDES during the third quarter 2011. On September 27, 2011, AECOM informed you via telephone that NYSDEC approved the temporarily shutdown of the remedial systems. You responded to AECOM that effluent sampling associated with Third Quarter 2011 DMR was not required and to include the NYSDEC May 27, 2011 letter with this document. On September 27, 2011, AECOM informed you via email that the remedial systems would remain offline through October 2011 as a result of the continuing chemical oxidation injection pilot test and, therefore, there would be no effluent and no samples would be collected.

We certify under the penalty of law that this document was prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our

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inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for known violations. We will continue to monitor the influent and effluent of the active remediation system located at the Site on a quarterly basis. The next scheduled quarterly discharge monitoring report is due by February 28, 2012.

If you have any questions regarding this submission, please do not hesitate to contact me.

Very truly yours,
Scott Technologies, Inc.



John Perkins
Director, Environment, Health, & Safety
Tyco Fire Protection

\enclosure

cc: Mr. Dennis Young, Buffalo Sewer Authority (electronic copy sent by AECOM)
Mr. Glenn May, NYSDEC Region 9 (electronic copy sent by AECOM)
Ms. Deanna Ripstein, NYSDOH Western Region (electronic copy sent by AECOM)
Mr. Joseph Gabner, AVOX Systems Inc. (hard copy sent by AECOM)
Mr. Eric Frauen, O&M, Inc. (electronic copy sent by AECOM)
Facility File, Lancaster, NY (hard copy sent by AECOM)

New York State Department of Environmental Conservation

Division of Environmental Remediation, Region 9

270 Michigan Avenue, Buffalo, New York 14203-2915

Phone: (716) 851-7220 • Fax: (716) 851-7226

Website: www.dec.ny.gov



Joe Martens
Commissioner

May 27, 2011

John Perkins, CHMM
Director, Environment Health & Safety
Tyco Safety Products
6600 Congress Avenue
Boca Raton, Florida 33487

Dear Mr. Perkins:

Pilot Test Work Plan Addendum
Scott Aviation Site, Registry No. 915149
Lancaster, Erie County

The New York State Department of Environmental Conservation (NYSDEC) is in receipt of the May 16, 2011 letter from Mr. Eric Frauen of O&M, Inc. (O&M), proposing to complete another injection of persulfate solution at the subject site. The initial injection at the site was completed between July and October 2010.

During the initial injection the Dual Phase Extract (DPE) system and Groundwater Collection Trench were operating during and subsequent to the injection. O&M believes that some of the oxidants may have been pumped from the subsurface prior to being fully utilized to treat the contaminants. During the proposed injection, therefore, O&M proposes to inactivate the DPE system and Groundwater Collection Trench during, and for several months following, injection. O&M believes that this will increase oxidant distribution, the time the oxidant is in contact with the contaminants, and maximize contaminant destruction.

Given that groundwater is monitored quarterly at this site and would detect migration of the groundwater plume, the O&M proposal is acceptable. Please be advised, however, that based upon the results of the July 2011 groundwater sampling event, the NYSDEC may request additional rounds of groundwater sampling prior to the next scheduled event.

Should you have any questions, please feel free to contact me at (716) 851-7220.

Sincerely yours,

Glenn M. May, CPG
Environmental Geologist II

GMM:sz

cc: Mr. Gregory Sutton, NYSDEC, Region 9
Mr. Joseph Gabner, AVOX Systems, Inc.
Mr. Eric Frauen, O&M, Inc.
Mr. Dino Zack, AECOM Technical Services, Inc.
Ms. Deanna Ripstein, NYS Department of Health