



Feasibility Study for the Remediation of the Former Carborundum Company – Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, New York SITE NO. 932036

FINAL DOCUMENT

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EXECUTIVE SUMMARY

The former Carborundum Company's Hyde Park facility ("site") in Niagara Falls is listed on the New York State Department of Environmental Conservation's (NYSDEC's) list of Inactive Hazardous Waste Disposal Sites. The site, which is classified as a Class 2 site, is identified as Site No. 932036. A Class 2 site is defined as a site that poses a significant threat to the public health or the environment and one that requires mitigative action.

The Carborundum Company was required by an NYSDEC Order on Consent (INDEX# B9-0454-94-04) to conduct a remedial investigation/feasibility study (RI/FS) of the site. BP America retained the environmental liability associated with the site during the acquisition of the Carborundum Company and subsequent sale of the subject property. DE&S was retained by BP America to undertake the RI/FS.

The purpose of the RI/FS is to develop and implement a cleanup program that will allow the removal of the site from the NYSDEC's list of hazardous waste disposal sites. Volatile organic compounds (VOCs) have been detected in soils and groundwater on the site at concentrations that exceed NYSDEC Soil Cleanup Objectives and/or Groundwater Standards/Criteria. The VOCs of concern at the site include trichloroethylene and its breakdown products. In addition, one small area of the site near the railroad spur contains soils with polycyclic aromatic hydrocarbon (PAH) concentrations above NYSDEC Soil Cleanup Objectives.

Groundwater flow in the vicinity of the former Carborundum Company facility is toward the southwest in both the bedrock and the shallow overburden. Two USEPA hazardous waste sites as well as numerous other industrial sites are located upgradient of the former Carborundum Company property. Concentrations of some contaminants detected in upgradient areas are lower than those detected on the former Carborundum Company facility, and some upgradient wells on the Carborundum property are located near sources of on-site contamination. However, the identification of groundwater contamination in wells upgradient of the site indicates that groundwater contamination on the former Carborundum Company site may be at least partially

due to offsite or upgradient sources. The extent of potential off-site groundwater contamination has not been defined. Additional data must be collected to better determine the potential impact of upgradient sites on the former Carborundum Company property.

The Risk Assessment conducted during the RI concluded that contaminant levels in soil and groundwater do not pose an immediate threat to human health or the environment. This conclusion was drawn based on site-specific data and on the fact that contaminants in groundwater are located greater than five feet below ground surface, and most of the ground in the area is covered in asphalt or concrete, which acts as an additional barrier to potential exposure.

The remedial action objectives developed to address soil and groundwater contamination on the site include:

- Remove contaminants from on-site soils to meet NYSDEC Soil Cleanup Objectives. This
 was achieved through remediation of soils and removal of the on-site source of shallow
 groundwater contamination during execution of an interim remedial measure (IRM) at the
 site.
- 2. Reduce contaminant concentrations in groundwater in the short-term. Ultimately, the objective is to remediate contaminated groundwater to meet NYSDEC Groundwater Standards/Criteria. The short-term objective will likely be attained through removal of the source of on-site contamination conducted during the IRM. This is considered a reasonable objective that will create a reduction in contaminant concentrations with time in the immediate vicinity of the site, particularly in shallow groundwater in the overburden. This objective for groundwater meets the goal of ensuring continued protection of human health and the environment and attaining an overall reduction in groundwater contaminant concentrations with time.

The recommended remedial alternative for soil is excavation of contaminated soils from the site and off-site disposal at RCRA approved Part 360 and 373 landfills. This alternative was implemented during execution of an interim remedial measure (IRM) to remediate contaminated soils at the site. By removing contaminated soils from the site, identified sources of potential groundwater contamination were removed from the former Carborundum Company property.

Two major factors impact the ability of currently available groundwater remediation technologies to reduce contaminant concentrations below the NYSDEC Groundwater Standards/Criteria:

- 1. The potential presence of off-site, upgradient sources of contamination, and
- 2. The fine-grained and heterogeneous nature of on-site soils and the presence of fractured bedrock.

Removal of contaminated soils during the IRM removed over 90% of contaminated soil that acts as an on-site source of contaminants to groundwater; however, off-site sources may remain that could continue to contribute to groundwater contamination. A groundwater remediation system that involves removal or extraction of contaminants may not achieve cleanup if off-site sources remain that could continue to contribute contaminants to groundwater.

Aggressive groundwater remediation is not recommended for this site. Due to the site-specific geology, it is considered impractical given currently available technologies to achieve cleanup to groundwater standards. The recommended groundwater management option is groundwater monitoring. This option will allow an evaluation of the natural degradation of groundwater contaminants with time, which can be used by BP America and the NYSDEC to evaluate the need for any further action at the site.

Monitoring should consist of periodic groundwater sampling for a specific monitoring period of several years to document on-site groundwater conditions as they change with time. At the end of the specified monitoring period, the need for further monitoring should be evaluated.

Monitoring frequency and other details will be provided at a later date in a detailed groundwater monitoring plan.

TABLE OF CONTENTS

1.	INTRODUCTION	
	1.1 PURPOSE	2
	1.2 REPORT ORGANIZATION	
	1.3 BACKGROUND	
	1.3.1 Site Description and Brief History	
	1.3.2 Site Topography and Hydrogeology	9
2.	SUMMARY OF INVESTIGATION RESULTS	10
	2.1 CONTAMINANTS OF CONCERN	10
	2.1.1 Volatile Organic Compounds	
	2.1.2 Polycyclic Aromatic Hydrocarbons	11
	2.2 EXTENT OF SOIL CONTAMINATION	11
	2.2.1 Area I	13
	2.2.2 Area 2	13
	2.2.3 Area 3	14
	2.2.4 Area 4	14
	2.2.5 Area 5	
	2.3 EXTENT OF GROUNDWATER CONTAMINATION	
	2.3.1 Groundwater in Overburden	
	2.3.2 Groundwater in Bedrock	
	2.4 RISK ASSESSMENT	23
3.	ARARS AND REMEDIAL ACTION OBJECTIVES	25
	3.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)	25
	3.1.1 ARARS for Soil	
	3.1.1.1 RCRA Requirements	
	3.1.1.2 NYSDEC Contained-In Policy Requirements	
	3.1.1.3 NYSDEC Soil Cleanup Objectives	
	3.1.2 ARARS for Groundwater	27
	3.2 REMEDIAL ACTION OBJECTIVES	28
	3.3 SOIL CLEANUP OBJECTIVES AND GROUNDWATER STANDARDS/CRITERIA	29
4.	IDENTIFICATION AND PRELIMINARY SCREENING OF TECHNOLOGIES	31
	4.1 GENERAL TECHNOLOGY CATEGORIES	31
	4.2 PRELIMINARY SCREENING OF REMEDIAL TECHNOLOGIES	33
	4.3 POTENTIAL ALTERNATIVES FOR GROUNDWATER	36
5.	GROUNDWATER ALTERNATIVES SCREENING AND DEVELOPMENT	37
	5.1 POTENTIAL ALTERNATIVES SCREENING FOR GROUNDWATER	37
	5.2 DEVELOPMENT OF ALTERNATIVES	40
	5.2.1 No Action (GW-1)	40
	5.2.2 Institutional Controls (GW-2)	
	5.2.2.1 Access Restrictions (GW-2a)	
	5.2.2.2 Groundwater Monitoring (GW-2b)	41
	5.2.3 Removal Using Vertical Wells (GW-3a)	
	5.2.4 Removal Using Horizontal Wells (GW-3b)	43

5.2.5 5.2.6	Asphalt/Concrete Capping (GW-4c)
5.2.7	In-Still Treatment Osing Zero-Valent Metal (GW-5d)
6. RECO	MMENDED ALTERNATIVES46
6.1 GRO	UNDWATER MONITORING AND DEED RESTRICTIONS
7. SUMM	IPLIANCE WITH ARARS
/. SUMINI	ARY OF IRM RESULTS49
8. REFER	ENCES54
List of App	<u>endices</u>
Appendix A	
Appendix B	Summary of Groundwater Sampling Data
List of Tabl	
Table 2.1	Change in Contaminant Concentration in Overburden Monitoring Wells with Time
Table 2.2	Change in Contaminant Concentration in Redrock Monitoring Wells
Table 3.1	with Time
Table 4.1	Groundwater Standards/Criteria 30 Remedial Technologies and Process Outing S. G.
Table 4.2	Remedial Technologies and Process Options for Groundwater
Table 5.1	Screening of Remedial Technologies and Process Options for Groundwater34 Summary of Groundwater Alternatives Screening
	38
List of Figur	<u>res</u>
Figure 1.1	Site Location Map
Figure 1.2	Site Plan 6
Figure 1.3	Map of Industrial Sites Upgradient of Subject Property
Figure 2.1	Areas of Soil Contamination
Figure 2.2	Total VOC Groundwater Analytical Results – Shallow Wells – Nov. 199716
Figure 2.3	Total VOC Concentrations in Overburden Monitoring Wells
Figure 2.4	Total VOC Groundwater Analytical Results – Deep Wells – Nov. 199720
Figure 2.5	Total VOC Concentrations in Bedrock Monitoring Wells
Figure 7.1	Remaining Areas of Soil Contamination On Site

1. INTRODUCTION

The former Carborundum Company's Hyde Park facility ("site") in Niagara Falls is listed on the New York State Department of Environmental Conservation's (NYSDEC's) list of Inactive Hazardous Waste Disposal Sites. The site, which is classified as a Class 2 site, is identified as Site No. 932036. A Class 2 site is defined as a site that poses a significant threat to the public health or the environment and one that requires mitigative action.

The Carborundum Company was required by an NYSDEC Order on Consent (INDEX# B9-0454-94-04) to conduct a remedial investigation/feasibility study (RI/FS) of the site. BP America retained the environmental liability associated with the site during the acquisition of the Carborundum Company and subsequent sale of the subject property. Duke Engineering & Services, Inc. (DE&S) was retained by BP America to undertake the RI/FS.

A Remedial Investigation (RI) of the site was completed in 1996 by DE&S, formerly Intera Consultants, Ltd. A Phase II RI was completed in November 1997. Results of the RI and Phase II RI indicate that soils exist in several areas on the property that contain volatile organic compounds (VOCs) and/or polycyclic aromatic hydrocarbons (PAHs) at concentrations that exceed NYSDEC Soil Cleanup Objectives.

A work plan, and plans and specifications for conducting an interim remedial measure (IRM) were submitted and approved by the NYSDEC in 1999. That work program included a drilling and soil sampling investigation to further refine the extent of contaminated soils and the removal of those soils as part of an IRM. A detailed description of the results is presented in the IRM report (DE&S, 1999c). Removal of contaminated soils was executed as a permanent part of the remedial solution for the site. Contaminated soils were excavated and hauled off site for appropriate disposal.

A summary of the results of the RI, Phase II RI, and IRM Investigation is presented in Section 2. A summary of results of the IRM is provided in Section 7. The remainder of this report presents the Feasibility Study (FS) that was undertaken for the site.

1.1 PURPOSE

The purpose of the RI/FS is to develop and implement a cleanup program that will allow the removal of the site from the NYSDEC's list of hazardous waste disposal sites. The FS follows a series of steps that ultimately leads to a Record of Decision and site cleanup. These steps include:

- identification of criteria specific to applicable or relevant and appropriate requirements (ARARS)
- identification of potential treatment technologies/management options
- assessment of technologies/management options
- screening of technologies/management options
- detailed analysis of alternatives
- selection of a remedy

1.2 REPORT ORGANIZATION

The remainder of this section of the report provides background information relating to site history and physical features. Section 2 provides a summary of results of the RI, Phase II RI, and IRM Investigation work that has been completed to date. Section 2 also provides a discussion of the contaminants of concern and provides a description of areas and volumes of contamination on the site, as known following completion of the IRM investigation. Section 3 develops the remedial action objectives for the site and identifies the applicable and relevant or appropriate requirements (ARARS). Section 4 provides a discussion of the identification and preliminary screening of potential remedial technologies/management options. Section 5 describes the criteria that will be used to initially screen out technically infeasible options and provides a screening of alternatives for groundwater. Section 6 describes the recommended alternatives for groundwater. Section 7 provides a summary of the results of the IRM for soil.

1.3 BACKGROUND

The following is a brief chronology of the work that has been completed to date to characterize the environmental condition of the site, and associated references.

- 1985: The Carborundum Company retained Earth Dimensions Inc. of East Aurora, NY to undertake preliminary soil and groundwater sampling at the site.

 Earth Dimensions Inc. (1985) Soils Report Preliminary Site Assessment (PSA) Hyde Park Facility, Carborundum Globar Manufacturing, Niagara Falls, NY.
- 1990: NYSDEC retained URS Consultants Inc. of Buffalo, NY to complete a records search and preliminary assessment. Field work consisted of a site visit and field measurements of air quality and radioactivity.
 - URS Consultants Inc. (1990) Engineering Investigations at Inactive Hazardous Waste Sites, Preliminary Site Assessment, Carborundum Company Globar Plant Site No. 932036 Niagara (T), Niagara (C), Prepared for: NYSDEC Division of Hazardous Waste Remediation.
- 1992: The Carborundum Company retained DE&S, formerly INTERA, to complete soil sampling, groundwater sampling and to provide a preliminary assessment of risk to human health and the environment.
 - INTERA (1993) Report on the Preliminary Site Assessment of the Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Prepared for The Carborundum Company Site No. 932036.
- 1993: The Carborundum Company retained DE&S, formerly INTERA, to undertake additional borehole drilling and soil sampling. No report was prepared.
- 1996: BP America retained DE&S, formerly INTERA, to conduct a RI. This work involved additional soil and groundwater sampling both on and off site to better define the extent of contamination. A more comprehensive risk assessment was undertaken.
 - INTERA (1997) Remedial Investigation of the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036.
- 1997: BP America retained DE&S to conduct a Phase II RI that included installing a groundwater monitor well to bedrock downgradient of the site, conducting additional soil sampling, and conducting a round of groundwater sampling from all wells.

DE&S (1998) Phase II Remedial Investigation of the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036.

 1998. BP America retained DE&S to prepare an IRM work plan and plans and specifications document for execution of the IRM at the site.

DE&S (1999) Interim Remedial Measure Work Plan for the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036.

DE&S (1999) Plans and Specifications for Execution of the Interim Remedial Measure for the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036.

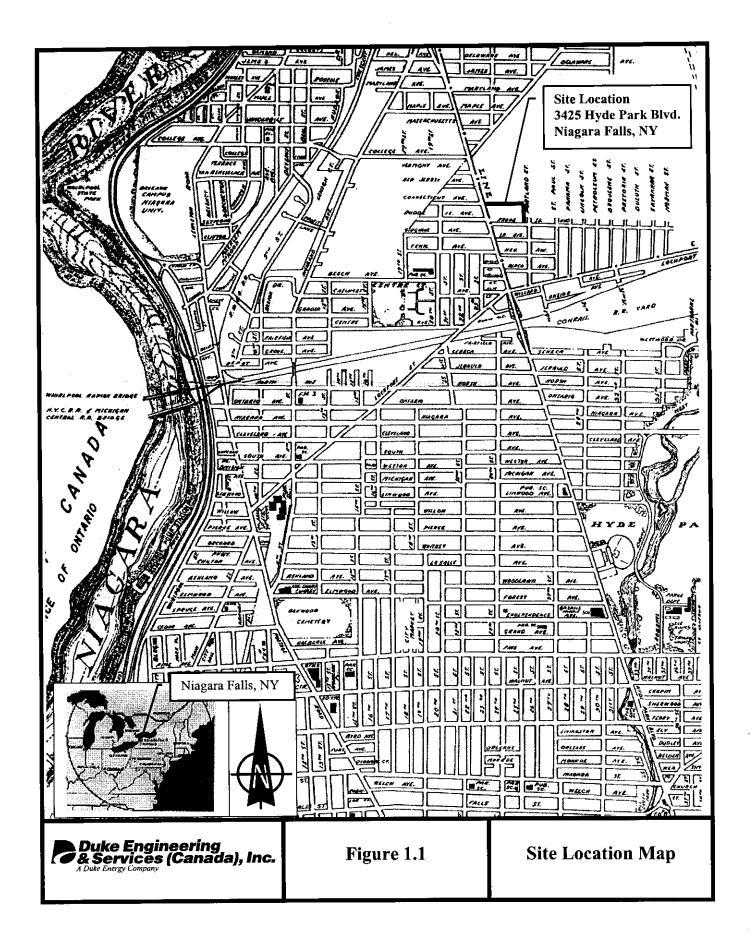
• 1999. BP America retained DE&S to oversee execution of the IRM at the site.

DE&S(1999) Execution of the Interim Remedial Measure for the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036.

1.3.1 Site Description and Brief History

The Carborundum Company's former Electric Products Division facility is bordered on the west side by Hyde Park Boulevard and on the south side by Rhode Island Avenue in the Town of Niagara in Niagara County, New York. A location map showing the site is provided on Figure 1.1. The plant manufactured heating elements and electronic components from silicon carbide and was purchased by The Carborundum Company from the Globar Company in 1936. The Carborundum Company was purchased by BP America and the facility was subsequently sold to CESIWID, Inc. in December 1993. CESIWID changed its corporate name to Kanthal-Globar in 1998 and continues to manufacture similar products.

A site plan is provided as Figure 1.2. The west half of the site is occupied by the plant buildings. The east half of the site consists of a paved parking lot and a gravel area that was formerly used for staging and storing excess materials (sand, silicon carbide, scrap graphite and steel, and empty drums). Prior to 1962, the gravel area was also used to burn cardboard, paper and scrap wood (INTERA, 1993). This area, which is less than one acre in size in the northeastern portion of the former Carborundum Company facility property, has been designated by NYSDEC as a Class 2 inactive hazardous waste disposal site.

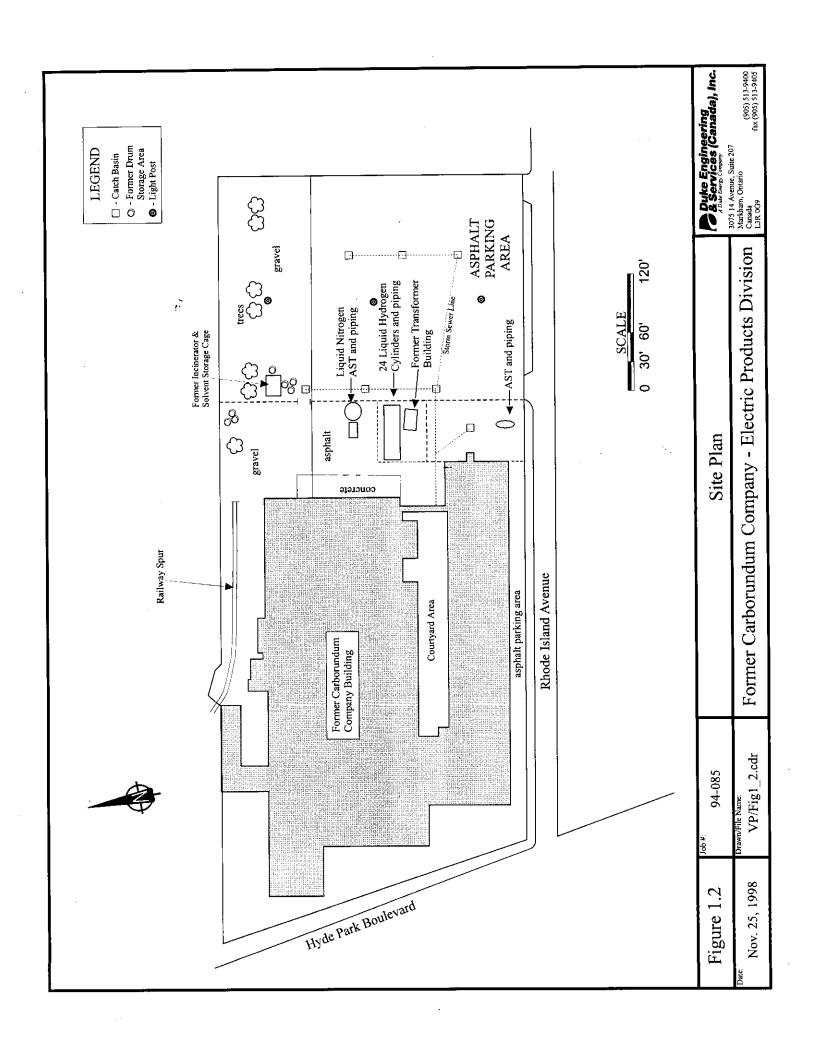


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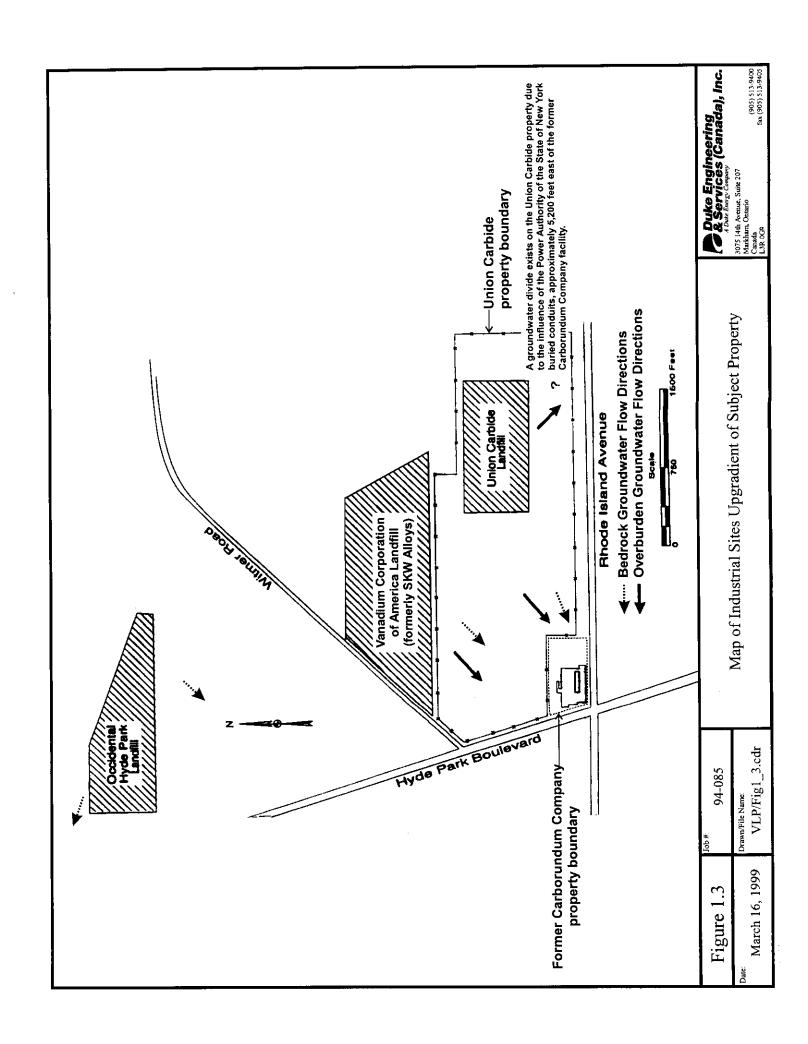
The area immediately to the north and west of the Carborundum Company facility is occupied by light and heavy industry while the area immediately to the east and south is residential. Figure 1.3 shows the locations of past and present industrial sites upgradient of the site and approximate groundwater flow directions. Groundwater flow in this area is affected by Power Authority of the State of New York (PASNY) conduits that are located approximately 5,200 feet east of the former Carborundum Company site (INTERA, 1997). The conduits influence groundwater flow, creating a groundwater divide to the east of the site. East of the divide, groundwater flow is directed toward the buried conduits. West of the divide, groundwater flows southwest toward the Niagara River. The Vanadium Corporation of America (formerly SKW Alloys) Landfill and the Occidental Chemical Hyde Park Landfill are listed by the United States Environmental Protection Agency (USEPA) as Priority Niagara River Hazardous Waste Sites.

The Vanadium Corporation of America owns a 62 acre landfill less than 1200 feet upgradient of the former Carborundum Company site. The landfill has not been active for several years. Groundwater sampling results for individual organic constituents were not available during the preliminary site assessment (PSA) completed by INTERA Inc. in 1992; however, total organic carbon levels in groundwater beneath the Vanadium landfill are relatively high (INTERA 1993). The Union Carbide site is also located immediately north and east of the former Carborundum Company site. The Union Carbide site includes a closed landfill where hazardous wastes are suspected to have been disposed (INTERA 1993). Suspected wastes include coal tar, petroleum tars, machine oils and spent degreasing sludges. On the upgradient side of the Union Carbide landfill, the groundwater in the bedrock aquifer was found to contain elevated levels of trichloroethene, 1,1,2,2-tetrachloroethene, vinyl chloride, chloroform and hexachlorobutadiene (INTERA 1993). Although concentrations of some of these compounds are lower than those detected on the former Carborundum Company site, the presence of two USEPA hazardous waste sites and other industrial sites upgradient of the former Carborundum Company property indicates that groundwater contamination on the former Carborundum Company site may be at least partially due to offsite or upgradient sources. Additional data must be collected to better determine the potential impact of upgradient sites on the former Carborundum Company property.

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1.3.2 Site Topography and Hydrogeology

The topography at the site is flat with a gentle slope across the property to the south. Elevation at the site is approximately 595 feet above mean sea level. The land immediately north of the former Carborundum Company site is several feet higher in elevation and is occupied by an industrial park. This area was formerly owned and occupied by Union Carbide Corporation.

General geology in the area consists of glaciolacustrine sediments and glacial till 17-32 feet in thickness overlying Middle Silurian dolostone bedrock of the Lockport Dolomite. The glacial till layer consists of fractured, very dense, fine-grained, heterogeneous, reddish-brown, silty-clay till.

The water table in the vicinity of the site occurs at depths ranging from 2.3 to 12.2 feet below ground surface (INTERA 1993, 1997 and DE&S, 1998) with perched conditions reported at the northeast edge of the site. The major aquifer in the area is the weathered, fractured, upper portion of bedrock that occurs between 16.5 and 32 feet below ground surface (DE&S 1997). Groundwater flow directions are generally southwesterly across the site for groundwater in both shallow overburden and deeper bedrock. Annual groundwater flow velocities range from 3-10 feet per year in overburden to 100-200 feet per year in bedrock (INTERA 1993, 1997 and DE&S, 1998).

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2. SUMMARY OF INVESTIGATION RESULTS

2.1 CONTAMINANTS OF CONCERN

Contaminants of concern (COCs) in soils at the site were identified as volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs).

2.1.1 Volatile Organic Compounds

VOCs have been identified in both soil and groundwater on site. Specific VOCs identified in soils include:

1,2-dichloroethene

trichloroethene

vinyl chloride

toluene

acetone

ethyl benzene

xylenes

In groundwater, the following VOCs have been detected at concentrations in excess of NYSDEC Groundwater Quality Standards or Guidance Values:

vinyl chloride

trichloroethene

1,2-dichloroethene

benzene

1,1-dichloroethane

Acetone, trichloroethene, and xylenes were used in operations at the Carborundum Electric Products Division facility. Vinyl chloride, 1,2-dichloroethene and 1,1-dichloroethane are breakdown products of trichloroethene. Benzene, toluene, ethyl benzene, and xylenes are components of petroleum products, and may indicate historic spillage or leakage of petroleum products on the property.

Trichloroethene in groundwater naturally breaks down with time to form 1,2-dichloroethene, which degrades to form vinyl chloride, which in turn degrades to carbon dioxide and water.

2.1.2 Polycyclic Aromatic Hydrocarbons

Specific PAHs identified on site include:

naphthalene fluorene

acenaphthylene

anthracene

phenanthrene

benzo(a)anthracene

pyrene chrysene

benzo(b)fluoranthene

benzo(k)fluoranthene

benzo(a)pyrene

indeno(1,2,3cd)pyrene

These compounds are components of coal tar, creosote and oil and grease. PAHs are restricted to soils in the vicinity of the north property fence and railroad spur and are associated with a former oil spill on the adjacent property to the north.

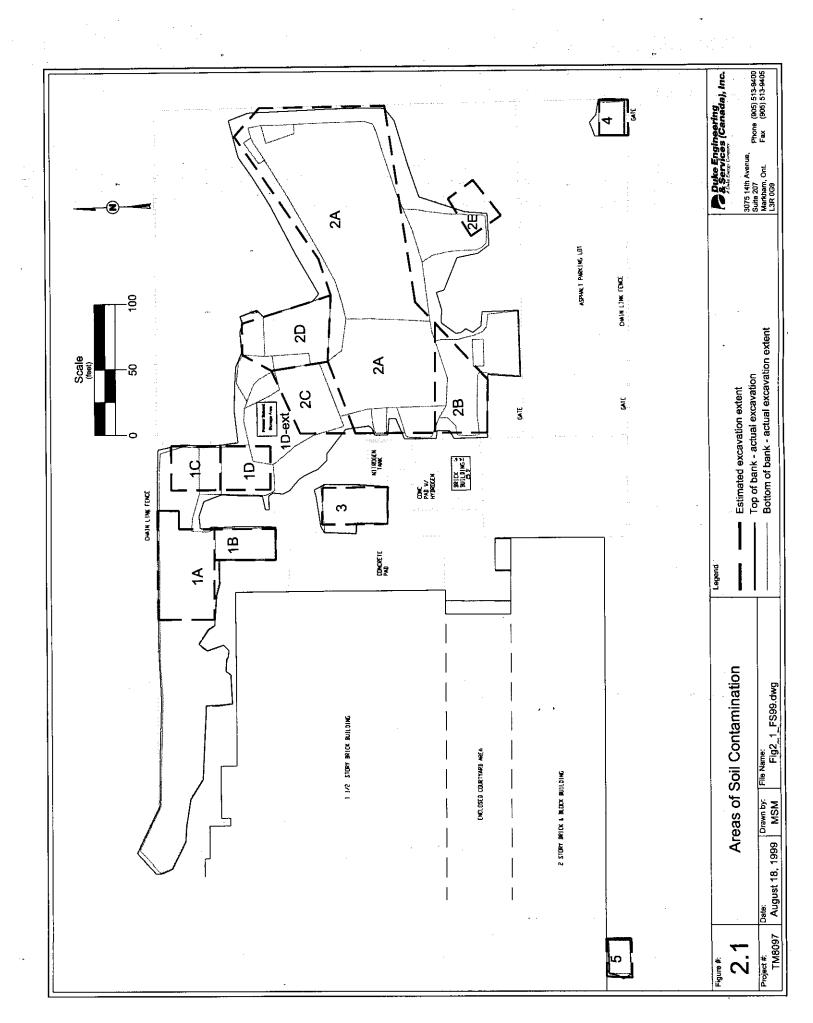
2.2 EXTENT OF SOIL CONTAMINATION

Extensive soil sampling has been conducted in shallow, mid-level, and deeper soils at the site (INTERA 1993, 1997 and DE&S, 1998, 1999b). Appendix A includes a figure depicting sample locations and a summary table of soil sampling results for COCs.

COCs were found in five areas on the site at concentrations in excess of NYSDEC Soil Cleanup Objectives:

- Area 1
- A small area in the vicinity of the north property fence and railway spur
- contaminated with VOCs and PAHs,
- Area 2
- A larger area within the former scrap metals storage area contaminated with VOCs,
- Area 3
- A small area south of Area 1 contaminated with VOCs,
- Area 4
- A small area in the southeastern portion of the site contaminated with acetone, and
- Area 5
- A small area in the southwestern portion of the site contaminated with xylenes and lead.

Figure 2.1 depicts the extents of contamination, as identified during the IRM excavation activities. Soil contamination was found primarily at shallow depths. A brief description of soil contamination in each area follows.



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2.2.1 Area 1

Area 1 was located in the railroad spur area in the northern portion of the site and contained soils contaminated with PAHs and VOCs. Area 1 contained four contaminated sub-areas. The first (1A) was located in the western portion of Area 1 and was impacted to a depth of up to 4 ft with VOCs and PAHs. Excavation in this area was extended west along the railroad spur to remove PAHs identified in surficial soils. The second area (1B) was located south of 1A and was impacted with VOCs between 8 to 10 ft in depth. Area 1C was located in the northeastern portion of Area 1 and was impacted by VOCs to 6 ft depth. Areas 1A and 1C were extended during excavation beyond their identified boundaries and eventually merged. Finally, Area 1D was located adjacent to the former solvent storage cage to the west. During the IRM, the solvent storage cage was removed and Area 1D was extended to the east to remove VOC contamination identified beneath the former solvent storage area (Area 1D extension). Area 1D extension eventually merged with Area 2C.

2.2.2 Area 2

Area 2 was located in the center of the parking area in the eastern portion of the site and was contaminated with VOCs, consisting of primarily trichloroethene and its breakdown products. Area 2 contained five contaminated sub-areas. The first, 2A, was the largest and extended from the eastern fence line to the western fence for the parking area to a depth of up to 24 ft. The second area, 2B, was small and located immediately south of the larger area to a depth of 16 ft. Area 2C was located immediately south of the former solvent storage cage and was impacted with VOCs to 24 ft depth. Area 2D was located to the east of the former solvent storage area and was impacted with VOCs to 7 ft depth. The fifth area, 2E, was impacted with VOCs to 12 ft and was located south of area 2A. Areas 2A and 2E were merged during excavation.

2.2.3 Area 3

Area 3 was located between the liquid nitrogen above ground storage tank (AST) and the concrete pad for the building and was impacted to a depth of 4 feet. Trichloroethene, cis- and trans-1,2-dichloroethene, acetone and total xylenes were detected at concentrations that exceed NYSDEC Soil Cleanup Objectives.

2.2.4 Area 4

Area 4 was located in the southeast corner of the site in the gateway used as an exit from the plant parking lot and was impacted to a depth of 4 feet. Acetone was detected at a concentration that exceeds the NYSDEC Soil Cleanup Objective.

2.2.5 Area 5

Area 5 was located in the southwest corner of the site in the executive parking area and was impacted to a depth of 2 feet with xylenes and lead. Total xylenes were detected at a concentration that exceeded the NYSDEC Soil Cleanup Objective. Lead was detected at a concentration that exceeded maximum toxicity characteristic concentrations in leachate.

2.3 EXTENT OF GROUNDWATER CONTAMINATION

Groundwater samples have been collected from monitoring wells on the site on three separate occasions. In 1992, monitoring well couplets MW-1 through MW-5 were sampled as part of the PSA. In 1996, additional monitoring wells MW-6 through MW-14 were sampled as part of the RI. Finally, in 1997 all 25 existing monitoring wells plus an additional well (MW-15) were sampled as part of the Phase II RI. Appendix B includes a figure depicting monitoring well locations and a summary table of groundwater sampling results for COCs.

2.3.1 Groundwater in Overburden

Results of VOC analysis on groundwater samples collected from the shallow, overburden wells on-site indicate that vinyl chloride, 1,2-dichloroethene, trichloroethene, benzene and 1,1-

dichloroethane exist in groundwater in the overburden at concentrations that exceed NYSDEC Water Quality Standards/Regulations. VOC concentrations in overburden wells are highest along the northern property boundary in the railroad spur area in MW-7A, which is considered an upgradient well. However, the highest vinyl chloride concentration was detected in MW-10A, located along the south property boundary directly downgradient of MW-7A. VOCs were not detected in overburden wells MW-1A, MW-3A, MW-11A, MW-13A, and MW-14A. MW-1A and MW-11A are located on the southeastern and southwestern property boundaries, respectively. MW-13A and MW-14A are located down gradient of the site across Rhode Island Avenue. MW-3A is located in the northeastern corner of the site. The most commonly detected compounds in groundwater in the overburden were 1,2-dichloroethene, trichloroethene and vinyl chloride. Figure 2.2 provides total VOC concentration results from 1997 sampling and total VOC concentration contours on a site map. The shape of the contours indicates that a source for VOC contamination may be off-site to the north.

Table 2.1 provides a summary of average contaminant concentrations detected in monitoring wells during the PSA/RI sampling round conducted in 1992/1996 and the Phase II RI sampling round conducted in 1997. From this data, it is clear that the maximum and average concentrations of vinyl chloride, trichloroethene, and benzene have decreased with time. The average concentrations of vinyl chloride, trichloroethene and benzene have decreased by 90%, 87%, and 97%, respectively. Average concentrations of 1,2-dichloroethene and 1,1-dichloroethane have increased with time by 44% and 263%, respectively. The increase in 1,2-dichloroethene and 1,1-dichloroethane concentrations, both breakdown products of trichloroethene, provides further evidence of the ongoing natural breakdown of trichloroethene on the site.

Figure 2.3 presents the total VOCs concentrations in the overburden monitoring wells in bar chart format. Total VOCs concentrations in 1997 are lower than in previous monitoring in 1992 and 1996 in all wells except MW-10A.

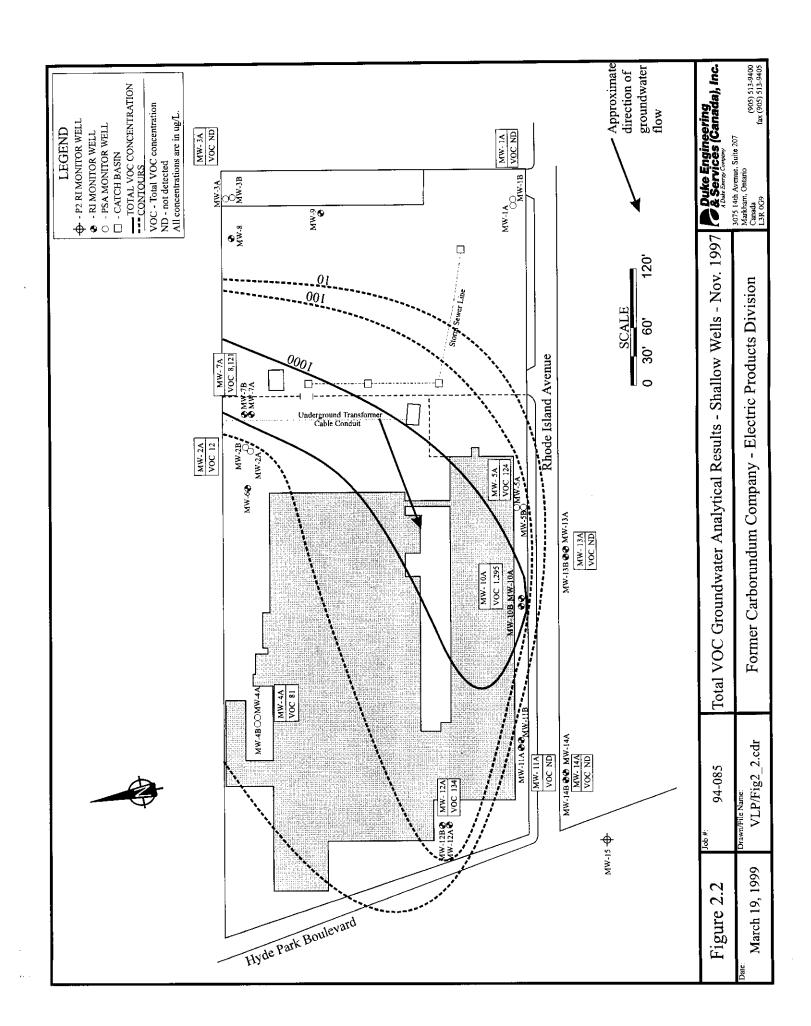
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TABLE 2.1 CHANGE IN CONTAMINANT CONCENTRATION IN OVERBURDEN MONITORING WELLS WITH TIME.

	Minimum Maximum % [C] [C] Change	hg/L µg/L	<2 65 -90	<5 5,206 44	<5 1,400 -87	<0.7 4 -97	<5 1,500 263
76	Average [C] Mir in wells MW7A-14A	d 7/8п	16	1,091	235		255
1661	Maximum [C]	µg/L	32	110	2.5	2.5	12
	Minimum [C]	µg/L	7	\$	<5	<0.7	<0.7
	Average [C] in wells MW1A-5A	T/8n	10	33	3		4
	Maximum [C]	J/8rl	200	1,200	8,700	200	125
1996	Minimum [C]	hg/L	<10	<10	<10	<10	<10
	Average [C] in wells MW7A-14A	T/Bri	94	389	1,475	111	36
	Maximum [C]	∏/gri	1,300	1,900	001	100	100
1992	Minimum [C]	hg/L	<10	<10	<10	<10	<10
	Average [C] in wells MW1A-5A	1/8n	265	431	23	24	22
	Contaminant		Vinyl Chloride	Cis- and trans—1,2-dichloroethene	Trichloroethene	Benzene	1,1-dichloroethane

^{1 -} Average % change is the change in average contaminant concentration between the first round of sampling in 1992 or 1996 and the most recent sampling round in 1997.

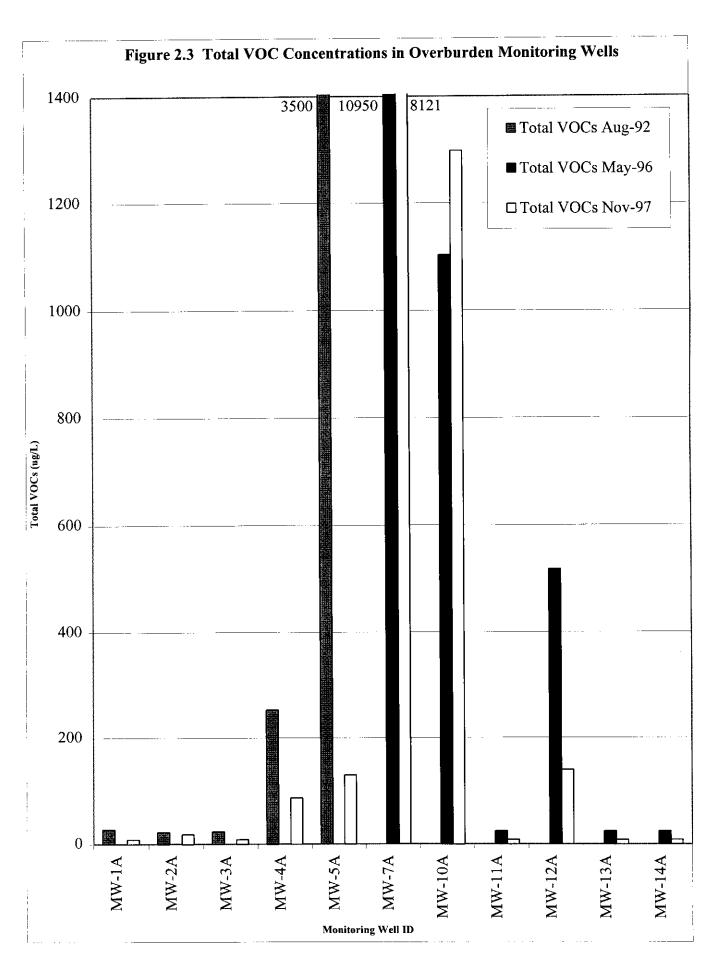
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2.3.2 Groundwater in Bedrock

Results of VOC analysis on groundwater samples collected from the deeper, bedrock wells on-site indicate that vinyl chloride, 1,2-dichloroethene, trichloroethene, benzene and 1,1-dichloroethane exist in groundwater in the bedrock at concentrations that exceed NYSDEC Water Quality Standards/Regulations. VOC concentrations in bedrock wells are highest along the south property boundary in MW-10B, MW-11B, MW-14B and MW-15. VOCs were not detected in bedrock wells MW-1B and MW-3B. MW-1B is located in the southeastern corner of the site, while MW-3B is located in the northeastern corner of the site. The most commonly detected compounds in groundwater in the bedrock were 1,2-dichloroethene, trichloroethene and vinyl chloride. Figure 2.4 provides total VOC concentrations from 1997 sampling and total VOC concentration contours on a site map. The shape of the contours indicates that a source for VOC contamination may be off-site to the north of the former Carborundum Company property.

Table 2.2 provides a summary of average contaminant concentrations detected in monitoring wells during the PSA/RI sampling round conducted in 1992/1996 and the Phase II RI sampling round conducted in 1997. From this data, a general trend of decreasing VOC concentrations can be seen. The maximum and average concentrations of all VOCs have decreased with time by 4% to 88%.

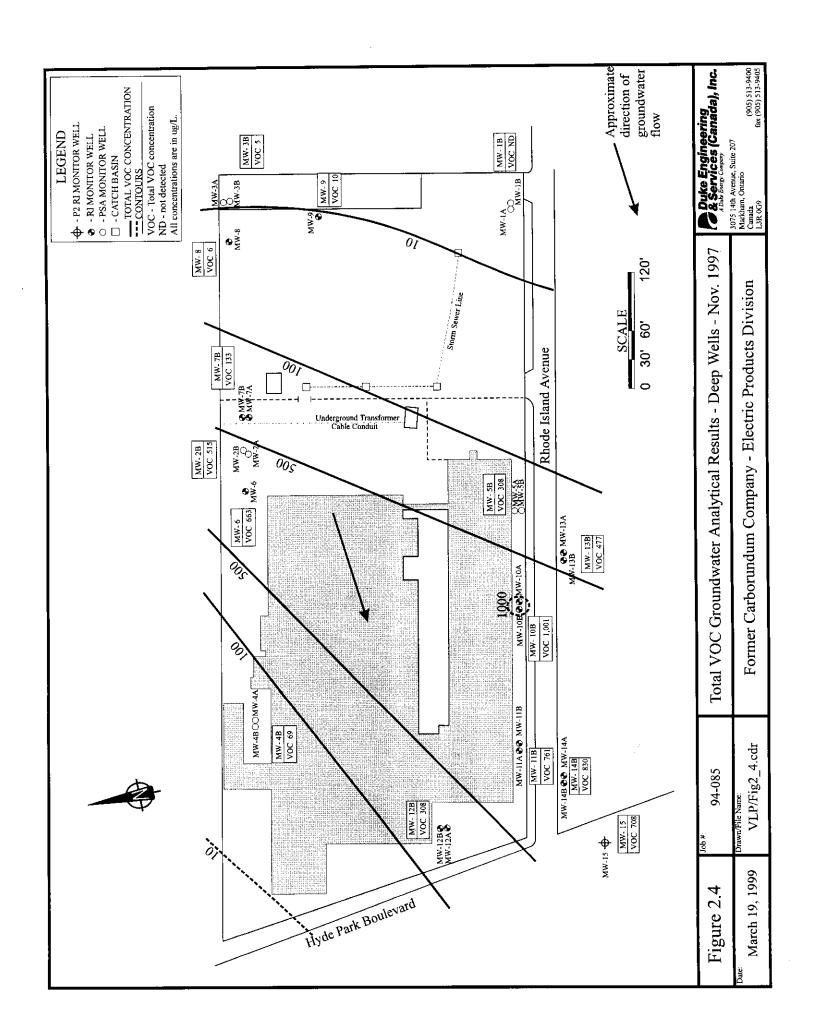
Figure 2.5 presents the total VOC concentrations in the bedrock monitoring wells in bar chart format. Total VOC concentrations in 1997 are lower than in previous monitoring in 1992 or 1996 in all wells except MW-11B, MW-12B and MW-14B.

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TABLE 2.2 CHANGE IN CONTAMINANT CONCENTRATION IN BEDROCK MONITORING WELLS WITH TIME.

	Average %		4	48	-84	-88	-72	
	Maximum [C]	T/8rl	89	921	36	0.5	5	
	Minimum [C]	ng/L	<2	9	\$	<0.7	<5	
76	Average [C] in wells MW6-15	T/Bri	42	441	6	4.0	3	
1661	Maximum [C]	µg/L	59	450	9	2.5	2.5	
:	Minimum [C]	hg/L	<2	\$	\$	<0.7	<0.7	
	Average [C] in wells MW1B-5B	µg/L	23	155	4		2	
	Maximum [C]	hg/L	120	1,900	06	150	150	
1996	Minimum [C]	ηg/L	<10	<10	<10	<10	<10	
	Average [C] in wells MW6-15	µg/L	33	561	30	35	35	
	Maximum [C]	1/8n	75	2,300	0.09	s	5	
1992	Minimum [C]	T/8rl	<10	01>	<10	ol>	<10	
	Average [C] in wells MW1B-5B	η/gπ	35	596	151	3	4	
	Contaminant		Vinyl Chloride	Cis- and trans— 1,2-dichloroethene	Trichloroethene	Benzene	1,1-dichloroethane	- Concentration

January 2000

¹⁻Average % change is the change in average contaminant concentration between the first round of sampling in 1992 or 1996 and the most recent sampling round in 1997.

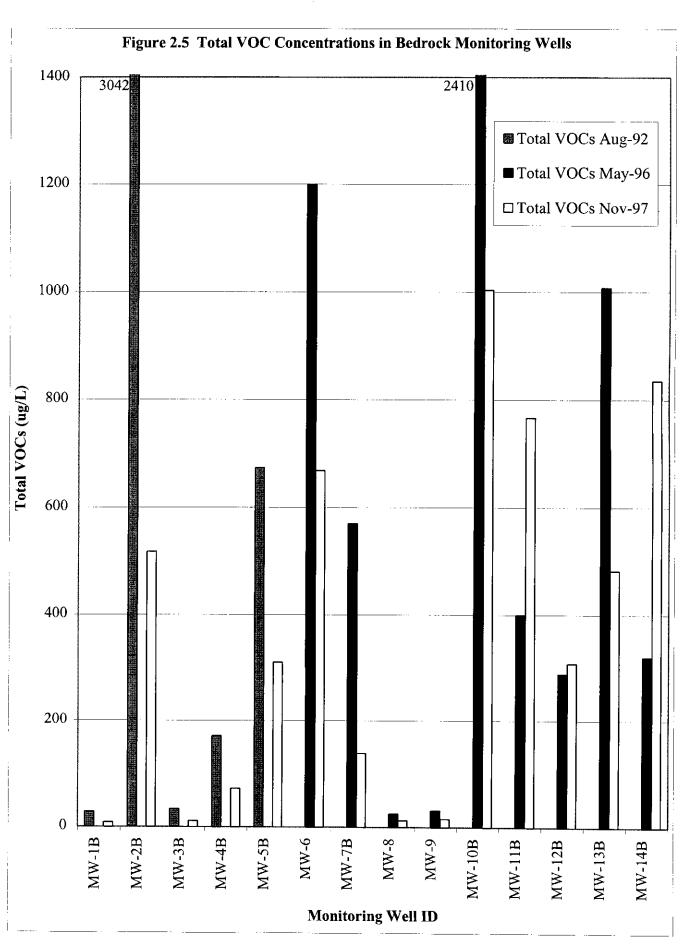
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2.4 RISK ASSESSMENT

The Risk Assessment conducted during the RI (INTERA, 1997) concluded that contaminant levels do not pose an immediate threat to human health or the environment. The Fish and Wildlife Impact Assessment concluded that the availability of natural resources that would support fish and wildlife in the subject area is severely limited by historical industrial and residential development. The site itself does not contain wildlife resources, and therefore does not have potential for wildlife exposure. The limited natural vegetation adjacent to the site has also been restricted by industrial development. Therefore, the site does not have a significant impact on fish or wildlife.

Potential receptors for the COCs at the facility include workers at the Kanthal-Globar plant and individuals living in the residential area immediately south and downgradient of the facility. Exposure pathways include the inhalation or dermal contact of soil containing COCs by plant or maintenance workers, and inhalation of COCs inside the plant and in downgradient residential homes from contaminants that have volatilized from groundwater.

The determination of risk resulting from exposure to contaminants is expressed in terms of a Hazard Index (HI) for non-carcinogenic contaminants and the level of risk for carcinogenic contaminants. The characterization of risk has been determined for the uncontrolled release of volatile COCs from groundwater flowing beneath the plant and downgradient residential homes. Non-carcinogenic chemicals were considered to be 1,2-dichloroethene, 1,1-dichloroethane, toluene, ethylbenzene, xylenes and acetone. Carcinogenic chemicals were considered to be vinyl chloride and trichloroethene.

The Hazard Index for non-carcinogens for plant workers is estimated to be 0.640 and for residential dwellers is estimated to be 0.017. A Hazard Index greater than 1.0 indicates a potential concern for health effects (USEPA, 1989). Values of 0.64 and 0.017 are well below 1.0, and indicate that there is little potential negative health effect from exposure to volatile vapors or contaminated groundwater on the site.

The cancer risk for plant workers exposed to vinyl chloride is estimated to be 9.78 x 10⁻⁷ and the risk for exposure to trichloroethene is estimated to be 9.78 x 10⁻⁸, for a total carcinogenic risk of 1.08 x 10⁻⁶. The cancer risks for downgradient residential dwellers due to exposure to vinyl chloride and trichloroethene are estimated to be 6 x 10⁻⁸ and 8.94 x 10⁻¹⁰, respectively for a total carcinogenic risk of 6 x 10⁻⁸. Acceptable cancer risk ranges from 1 x 10⁻⁵ to 1 x 10⁻⁶ or less (USEPA, 1989). The cancer risk for plant workers falls at the low end of this acceptable range and the risk to residential dwellers falls well below the acceptable range, indicating that there is little potential increased cancer risk from potential exposure to volatile vapors or contaminated groundwater on the site.

A further investigation of potential risks to nearby residential dwellers was conducted during a Phase II RI (DE&S 1998) surface soil sampling program. The purpose of the surface soil sampling was to provide additional information that would allow a preliminary assessment of the potential exposure and risk to residential property owners in the vicinity of the plant from the inhalation of ambient air, direct contact with soils, incidental ingestion of airborne dust or particulates, and ingestion of homegrown fruits and vegetables. The four surface soil samples that were selected by the New York State Department of Health (NYSDOH) were taken from the ground surface to a depth of two inches along the eastern property boundary of the site. VOCs were not detected in any of the four samples. Because the surficial soils did not contain detectable concentrations of COCs, there is no measurable exposure to residential property owners in the vicinity of the plant through inhalation of ambient outdoor air, direct contact with soils, incidental ingestion of airborne dust or particulates, or ingestion of homegrown fruits and vegetables.

The risk assessment concluded that there is little potential for exposure of plant workers or residential dwellers to contaminated soil in the subsurface. However, during excavation of contaminated subsurface soil, appropriate precautions were taken to ensure that workers and the surrounding communities were not exposed to contaminants through either dermal contact or inhalation. Such precautions included air quality monitoring, and the use of rubberized protective clothing and cartridge type respirators by excavation workers, when appropriate.

3. ARARS AND REMEDIAL ACTION OBJECTIVES

3.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

ARARS are federal, state, or local regulations that may apply to the remedial activities at the site. The National Contingency Plan (NCP, March 1990) states that a remedial action must meet all ARARS unless a waiver can be granted. The seven conditions [Superfund Amendments and Reauthorization Act, 1986, Section 121; Comprehensive Environmental Response, Compensation, and Liability Act, 1980, Sections 121(d)(2) and (d)(4)] for a possible waiver of ARARS follow:

- 1. The remedy under construction is only an interim remedy and is not the final or permanent remedy selected for the site.
- 2. Compliance with such standards would create a greater risk to public health than the benefit that it would provide.
- 3. Compliance with such standards is "technically impractical."
- 4. A different remedy exists that provides public health protection "equivalent" to the preferred cleanup standard.
- 5. A more stringent state standard, that would otherwise be applicable, has not been consistently applied to other sites in the state.
- 6. Compliance with an applicable state requirement would effectively result in the statewide prohibition of land disposal of hazardous substances.
- 7. The cost of the remedy is too expensive, considering the other demands on the fund.

3.1.1 ARARS for Soil

An Interim Remedial Measure (IRM) has been completed at the site. The IRM focused on removal of contaminated soils from the site. The IRM procedures and results are documented in an IRM report (DE&S, 1999c). Soil criteria used during the IRM are briefly discussed below.

3.1.1.1 RCRA Requirements

The Resource Conservation and Recovery Act (RCRA) requirements are applicable to the site if the contaminants of concern are classified as hazardous wastes under RCRA, as described in 40 CFR 261. There are two basic classifications of RCRA hazardous wastes:

1. Characteristic Hazardous wastes

- Hazardous due to ignitability (D001 waste)
- Hazardous due to corrosivity (D002 waste)
- Hazardous due to reactivity (D003 waste)
- Hazardous due to toxicity (D004 D043 wastes) as a result of the presence of specific chemical compounds in the TCLP extract solution.

2. Listed Hazardous waste

- Hazardous waste from non-specific sources (F series wastes)
- Hazardous waste from specific sources (K series wastes)
- Commercial chemical products (P and U series wastes)

Wastes are determined characteristic hazardous wastes based on the results of TCLP testing. To determine the applicability of listed waste classifications, it is necessary to understand site history and the contaminant source. According to previous investigations and historical research, the contaminants of concern at the site were released to the environment through waste management practices not regulated in the past, and unintentional spills and leaks. These activities include:

- Storing and washing of empty drums containing chlorinated solvents in the northeastern part of the site,
- An oil spill on the adjacent property to the north, resulting in the deposition of PAHs near the railroad spur,
- Undocumented minor spills of VOCs.

Based on these types of releases, wastes at the Former Carborundum Company facility have been considered U listed wastes, specifically U228 for trichloroethylene, and D listed wastes, specifically D040 for trichloroethylene.

3.1.1.2 NYSDEC Contained-In Policy Requirements

The NYSDEC has developed a guidance document for managing listed hazardous waste. The document (NYSDEC TAGM#3028, November 1992), is entitled "Contained-In" Criteria for Environmental Media. This contained-in policy applies to soil, sediment and groundwater contaminated by listed hazardous waste and removed pursuant to a corrective action plan. Soil Action Levels in the contained-in policy are protective of human health and the environment and are calculated based on the direct human ingestion exposure pathway. The contained-in policy was used to manage the excavation, handling, and disposal of soils from the site. The application of the contained-in policy is discussed in detail in the IRM report.

3.1.1.3 NYSDEC Soil Cleanup Objectives

The NYSDEC has developed a guidance document for the cleanup of inactive hazardous waste sites. The document (NYSDEC TAGM#4046, January 1994), is entitled Determination of Soil Cleanup Objectives and Cleanup Levels. The NYSDEC soil cleanup objectives were used as soil cleanup criteria and are discussed in the IRM report.

3.1.2 ARARS for Groundwater

No known drinking water wells are located within one mile of the Former Carborundum Company Facility, and residents and businesses in the Town of Niagara and City of Niagara Falls are supplied by a municipal water source. In addition, groundwater flow is toward the Niagara River, which is the closest receiving surface water body and is located 6500 feet west of the site. Due to dilution and sorption, the impact of COCs on the Niagara River are not considered significant or measurable. Therefore, federal drinking water standards are not considered applicable.

The NYSDEC Groundwater Standards and Guidance Values will be used as groundwater cleanup criteria. These values are derived from standards found in 6 NYCRR Part 703.5, or for

the cases where no standards exist, from the Division of Water Technical and Operational Guidance Series 1.1.1 (TOGS 1.1.1).

3.2 REMEDIAL ACTION OBJECTIVES

Remedial action objectives have been developed for the site and are discussed below. Remedial action objectives were developed to evaluate methods of protecting human health and the environment. Based on the results of the risk assessment, the former Carborundum Company facility is not considered a threat to either human health or the environment in its current condition. However, soil and groundwater on the site do contain contaminants of concern above NYSDEC soil cleanup objectives and groundwater standards.

The remedial action objectives developed to address soil and groundwater contamination on the site include:

- Remove contaminants from on-site soils to meet NYSDEC Soil Cleanup Objectives. This
 soil remediation was achieved by removing the on-site source of shallow groundwater
 contamination. This objective was met during execution of the IRM, except for a few small
 areas, described in Section 7. The NYSDEC gave support for the IRM in an Interim
 Remedial Measure Decision Document dated January 1999.
- 2. Reduce contaminant concentrations in groundwater in the short-term. Ultimately, the objective is to remediate contaminated groundwater to meet NYSDEC Groundwater Standards/Criteria. The short-term objective will likely be attained through removal of the source of on-site contamination conducted during the IRM. This is considered a reasonable objective that will create a reduction in contaminant concentrations with time in the immediate vicinity of the site, particularly in shallow groundwater in the overburden. This objective for groundwater meets the goal of ensuring continued protection of human health and the environment and attaining an overall reduction in groundwater contaminant concentrations with time.

3.3 SOIL CLEANUP OBJECTIVES AND GROUNDWATER STANDARDS/CRITERIA

Soil Cleanup Objectives used during the IRM were NYSDEC TAGM 4046, described in the IRM report. These objectives were met during execution of the IRM, except in a few small areas described in Section 7.

DE&S and the NYSDEC established a PAH clean-up objective of 25 ppm total PAHs for soil in areas 1A and 1C during execution of the IRM. This objective was established on June 16, 1999 because clean-up objectives for some individual PAH compounds are quite low and difficult to achieve given the widespread occurrence of PAHs in industrialized areas. Given the historical, current and future use of the property as an industrial site, the likelihood of human exposure to contaminated soil through ingestion and other routes of exposure considered for health-based criteria is very low. Therefore, the 25 ppm total PAHs clean-up objective was considered protective of human health and the environment, and reasonably achievable at an industrial facility.

NYSDEC Groundwater Standards/Criteria are provided in Table 3.1. Groundwater criteria were derived from 6 NYCRR Part 703.5 and/or Division of Water Technical and Operational Guidance Series 1.1.1.

TABLE 3.1 Groundwater Standards/Criteria (µg/L)

Contaminants of Concern	NYSDEC Groundwater Standards/Criteria
VOC	S
Acetone	50
1,2-Dichloroethene	5
1,1-Dichloroethane	5
Ethyl Benzene	5
Toluene	5
Trichloroethene	5
Vinyl Chloride	2
Xylenes	5
Semi VC	OCs .
Acenaphthylene	50
Anthracene	50
Benzo(a)Anthracene	0.002
Benzo(b)Fluoranthene	0.002
Benzo(k)Fluroanthene	0.002
Benzo(a)Pyrene	ND
Chrysene	0.002
Fluoranthene	50
Fluorene	50
Indeno(1,2,3cd)Pyrene	0.002
Napthalene	10
Phenanthrene	50
Pyrene	50

ND = not detectable

4. IDENTIFICATION AND PRELIMINARY SCREENING OF TECHNOLOGIES

General technology categories that may be appropriate for remediation of groundwater at the former Carborundum Company facility are identified in Section 4.1. Section 4.2 provides a preliminary screening of the identified technologies. A list of potential alternatives for further evaluation is provided in Section 4.3. Soil remediation was addressed through execution of the IRM in 1999. Support for the IRM was documented by the NYSDEC in an Interim Remedial Measure Decision Document dated January 1999. Details and results of the IRM are provided in a report entitled "Execution of the Interim Remedial Measure for the Former Carborundum Company — Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, New York," December 1999. Because the IRM for soil has been successfully completed, no further action will be considered for soil.

4.1 GENERAL TECHNOLOGY CATEGORIES

Contaminated groundwater is to be remediated by source removal and evaluation of treatment technologies. The goal for groundwater is to attain an overall reduction in contaminant concentrations with time and to meet NYSDEC Groundwater Standards/Criteria. General technology categories that were considered to achieve this goal include:

GW-1 No-Action

GW-2 Institutional Controls

GW-3 Removal of Groundwater by Pumping

GW-4 Containment

GW-5 Treatment

Table 4.1 provides a summary of remedial technologies and process options for groundwater.

Table 4.1 Remedial Technologies and Process Options for Groundwater

General Technology Category	Remedial Technology	Process Option	Option ID
No-Action	None	None	GW-1
Institutional Controls	Access Restrictions to Property	Deed/Well Restrictions	GW-2a
institutional controls	Monitoring	Groundwater Monitoring	GW-2b
Removal of Groundwater by Pumping (requires treatment	Groundwater Pumping/Extraction	Vertical pumping wells	GW-3a
of extracted groundwater)		Horizontal pumping wells	GW-3b
		Synthetic Membrane	GW-4a
	Capping	Soil/Clay cap	GW-4b
Containment		Asphalt/Concrete	GW-4c
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	Vertical Barriers	Slurry Wall/Grout Curtain	GW-4d
		Sheet Piling	GW-4e
	Contaminant Removal for Ex-Situ	Groundwater Flushing	GW-5a
Treatment	Treatment	Air Sparging/Vapor Extraction	GW-5b
	In-Situ Treatment	Microbial Degradation	GW-5c
		Zero-Valent Metal	GW-5d

# 4.2 PRELIMINARY SCREENING OF REMEDIAL TECHNOLOGIES

Potential remedial technologies identified in Table 4.1 have been evaluated during a preliminary screening process. This preliminary screening identifies those technologies best suited for further consideration as a remedial alternative and eliminates those technologies that have severe limitations due to site conditions or are not feasible for attaining remedial action objectives.

Criteria used during the preliminary screening process include:

- 1. Can the proposed remedial technology achieve the cleanup goals for this site?
- 2. Can the proposed remedial technology be used given the nature of the contaminants and subsurface materials found at this site?
- 3. Can the proposed remedial technology be used given the logistical and spatial restrictions at this site?

Table 4.2 provides a brief description of each process option and indicates whether each option is retained for further evaluation as a potential alternative.

Table 4.2 Screening of Remedial Technologies and Process Options for Groundwater

General Technology Category	Remedial Technology	Process Option (Option ID)	Description	Screening Comments
No-Action	None	None (GW-1)	No action taken	Retained as option
Institutional	Access Restrictions to Property	Deed/Well Restrictions (GW-2a)	Restrictions to industrial land use, including restrictions on well installation and water use	Potentially applicable
Controls	Monitoring	Groundwater Monitoring (GW-2b)	Continue on-going groundwater monitoring to evaluate trend of natural degradation of contaminants	Potentially applicable
Removal of Groundwater by	Groundwater	Vertical Pumping Wells (GW-3a)	Install dense network of pumping wells to extract contaminated groundwater	Potentially applicable
Pumping with Treatment	Pumping/Extraction	Horizontal Pumping Wells (GW-3b)	Install network of horizontal wells to extract contaminated groundwater	Potentially applicable
		Synthetic Membrane (GW-4a)	Cover soil with an impermeable membrane	Not applicable due to low durability in traffic areas
Containment	Capping	Soil/Clay cap (GW-4b)	Application of bentonite/clay over soil	Not applicable due to low durability in traffic areas
		Asphalt/Concrete (GW-4c)	Install layer of asphalt/concrete to prevent migration/contact	Potentially applicable
Containment	Vertical Barriers	Slurry Wall/Grout Curtain (GW-4d)	Trench filled with low-permeability slurry or grout installed around plume	Not applicable – limits of plume not defined or covers very large area
		Sheet Piling (GW-4e)	Installation of sheet piling around on-site plume	Not applicable – limits of plume not defined or covers very large area
Treatment	Contaminant Removal	Groundwater Flushing (GW-5a)	Inject treated groundwater upgradient and pump downgradient to enhance movement	Not applicable – not well proven for chlorinated solvents
	for Ex-Situ Treatment	Air Sparging/Soil Vapor Extraction (GW-5b)	Air is used to strip VOCs from groundwater in-situ. Requires treatment of extracted vapors.	Potentially applicable

General Technology Category	Remedial Technology	Process Option (Option ID)	Description	Screening Comments
	In Situ Treatment	Microbial Degradation (GW-5c)	Degradation of organics in-situ using nutrients and biological agents	Not applicable – not effective for low concentrations of chlorinated solvents
		Zero-Valent Metal (GW-5d)	Installation of a metal-filled trench downgradient of the plume that allows water to flow through it and reduces contaminants to less toxic compounds	Potentially applicable

NOTE: Technologies/Options indicated in BOLD have been identified during preliminary screening as potentially applicable.



January 2000

# 4.3 POTENTIAL ALTERNATIVES FOR GROUNDWATER

Preliminary screening of remedial technologies indicates that the following technologies/options from Table 4.2 are potentially applicable as remedial alternatives for groundwater at the former Carborundum Company site:

GW-1	No Action
GW-2a	Institutional Controls such as access restrictions to the property using deed or well restrictions
GW-2b	Groundwater Monitoring of natural degradation of contaminants
GW-3	Removal of Groundwater by Pumping via a pumping well network of vertical wells (GW-3a) or horizontal wells (GW-3b) [requires subsequent treatment of contaminated water].
GW-4c	Containment by capping using an asphalt/concrete cap
GW-5b	Treatment - removal of contaminants by air sparging/soil vapor extraction using volatilization of VOCs (requires treatment of extracted vapors).
GW-5d	Treatment – in-situ treatment of contaminants using a zero-valent metal to dechlorinate COCs as they move through a permeable wall

Remedial alternatives are further screened and developed in Section 5.

# 5. GROUNDWATER ALTERNATIVES SCREENING AND DEVELOPMENT

This section provides a more thorough screening of potential alternatives for groundwater remediation identified in Section 4.3. This screening evaluates potential alternatives that have been retained for technical merit and evaluates them from a financial and implementation view point. This includes an evaluation of technical effectiveness; implementability, including potential community acceptance of the technology; and relative cost. Relative costs and information on time-frame for cleanup are provided for budgetary purposes only. Accurate estimates of cost and cleanup times cannot be made without site-specific pilot testing of proposed technologies and detailed design work, which has not been performed at the site.

# 5.1 POTENTIAL ALTERNATIVES SCREENING FOR GROUNDWATER

Potential alternatives determined to be technically feasible and implementable include:

GW-1 No Action

GW-2 Institutional controls

- Access restrictions (GW-2a)
- Groundwater monitoring (GW-2b)

GW-3 Removal of Groundwater by Pumping with Treatment

- Pumping groundwater via vertical wells (GW-3a)
- Pumping groundwater via horizontal wells (GW-3b)

**GW-4** Containment of Contaminants

Capping of site using asphalt/concrete (GW-4c)

GW-5 Contaminant Removal for Ex-Situ Treatment

- Air Sparging/Vapor Extraction (GW-5b)
- In-Situ Treatment Using Zero-Valent Metal (GW-5d)

The potential alternatives for groundwater remediation at the former Carborundum Globar facility are listed in Table 5.1. This table also provides summaries of predicted effectiveness, implementability, and relative cost for each alternative.

Table 5.1 Summary of Groundwater Alternatives Screening

Process Option  Effective in removing contaminants.  Inplementability (capital)  Not effective in removing contaminants.  Restrictions (GW-2a): Restrictions or health effects  A would maintain low potential for exposure or health effects.  A would maintain low potential for exposure or health effects.  Would provide more data on fate of dwaler Monitoring wells.  By contaminants in subsurface and on natural degradation processes.  By contaminant of contaminants or contaminants.  By contaminants of contaminants or contaminants.  By contaminants of contaminants in limits additional wells.  By contaminants of contaminants or contaminants.  By contaminants of contaminants or contaminants.  By contaminants of contaminants in limits and by contaminants or contaminants.  By contaminants of contaminants or contaminants.  By contaminants of contaminants or contaminants.  By contaminants of contaminants.  By contaminants or contaminants from the need for specialized and heterogeneous soils.  By contaminants or contaminants from the need for specialized and heterogeneous soils.  By contaminants from the need for specialized and heterogeneous soils.  By contaminants from the need for specialized and heterogeneous soils.  By contaminants from the need for specialized selective in the need for specialized and heterogeneous soils.  By contaminants from the need for specialized selective in the				Total Coet	
ton taken  Not effective in removing contaminants.  Restrictions (GW-2a):  However, risk is low for exposure or health effects in Provence and the effective in removing contaminants.  Restrictions (GW-2a):  Not effective in removing contaminants.  Restrictions (GW-2a):  Robater Monitoring or health effects.  Not effective in removing contaminants in subsurface and on natural of periodic monitoring wells, may effective in subsurface and on natural all Using Vertical Wells.  All Using Vertical Wells are dependent on site of a pumping wells.  Bydrogeology. Option is less effective in the need for specialized and heterogeneous soils.  Requires additional wells.  Bydrogeology. Option is less effective in the need for specialized in pumping wells.  CAPADIS.  CAPADIS.  CAPADIS.  Reduces exposure, but the need for specialized in the need for spec	Process Option	Effectiveness	Implementability	(capital)	Recommendation
to taken  Not effective in removing contaminants.  Restrictions (CW-1s):  Not effective in removing contaminants.  Restrictions (CW-2a):  Not effective in removing contaminants.  Rould maintain low potential for exposure legal and administrative legal				[O&M]	
However, risk is low for exposure or health effects   However, risk is low for exposure or health effects	No-Action (GW-1):	Not effective in removing contaminants.	Easily implemented	\$0	Retain for further
Restrictions (GW-Za):   Realth effects	No action taken	However, risk is low for exposure or		(\$0)	evaluation as
Restrictions to property would maintain low potential for exposure legal and administrative mondowater including or health effects.   Processes and well-water restrictions and well-water restrictions and well-water restrictions and would maintain low potential for exposure legal and administrative   Registrations   Processes		health effects		[80]	alternative
reland use  dwater monitoring  dwater wising vertical wells  al Using Portical  streatment/disposal  al Using CW-4c):  for depiction on additional wells.  for of groundwater including  or health effects.  would provide more data on fate of  existing monitoring wells, may  fine-grained and heterogeneous soils.  existing monitoring wells, may  formal a dense network of pumping wells, in fine-grained and heterogeneous soils.  existing monitoring moverneous  fine-grained and heterogeneous soils.  formal a dense network of or specialized  fine-grained and heterogeneous soils.  formal a dense network of or specialized  formal wells.  formal wells.  formal wells.  formal wells.  formal wells.  formal wells.  formal a dense network of or specialized  formal wells.  formal wells.  formal wells.  formal wells.  formal wells.  formal wells.  formal a dense network of or specialized  formal wells.  formal wells.  formal wells.  formal wells.  formal wells.	Access Restrictions (GW-2a):	Not effective in removing contaminants.	Easily implemented through	A5C\$	Retain for further
Processes between deal use   Solution	Access restrictions to property	Would maintain low potential for exposure	legal and administrative	VICZ.	evaluation as
dwater Monitoring  Would provide more data on fate of position and use  Would provide more data on fate of position and use provide more data on natural by:  Confaminants in subsurface and on natural additional wells.  Would provide more data on fate of castily implemented using would provide more data on natural advantage quality. May degradation processes.  In Using Vertical Wells all Using Vertical water using vertical goodly. Option is less effective in of contaminated innegratined and heterogeneous soils.  In Using Morizontal Effectiveness dependent on site water using vertical al Using Horizontal al Using Horizontal (Minegratined and heterogeneous soils.)  In Using Morizontal wells.  Effectiveness dependent on site water using vertical innegratined and heterogeneous soils.  In Capping (GW-4c):  Easily implementable using groundwater is already low.  Easily implementable using groundwater is already low.  Easily implementable using groundwater is already low.  Easily implemented using from the with a standard construction methods are already low.  Easily implemented using from the castily implementable using groundwater is already low.  Easily implemented using from the castily implementable using groundwater is already low.  Easily implemented using from the castily implementable using groundwater is already low.  Easily implemented using from the castily implementable using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is already low.  Easily implemented using from the castily implemented using groundwater is alre	and groundwater including deed and well/water restrictions	or health effects.	processes	(\$25K)	alternative
dwater Monitoring         Not effective in removing contaminants.         Easily implemented using contaminants.         Easily implemented using contaminants.         Easily implemented using contaminants in subsurface and on natural additional wells.         Fasily implemented using contaminants in subsurface and on natural degradation processes.         Fasily implemented using contaminants in subsurface and on natural degradation processes.         Fasily implemented using contaminated degradation processes.         Fasily implemented using contaminants from the need for specialized in implementation due to the need spend of incegratined and heterogeneous soils.         Fasily implementation due to the need spend of incegratined and heterogeneous soils.         Fasily implementation due to the need spend of incegratined and heterogeneous soils.         Fasily implementation due to the need spend of incegration and heterogeneous soils.         Fasily implementation due to the need spend of incegration and heterogeneous soils.         Fasily implementation due to the need spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to spend of incegration and heterogeneous soils.         Fasily implementation due to the need spend of incegration and heterogeneous soils.         Fasily	for future land use			[80]	8-8-1
b):  Would provide more data on fate of ted periodic monitoring contaminants in subsurface and on natural ndwater quality. May degradation processes.  Industry duality. May degradation processes.  Industry degradation processes.  Industry duality degradation processes.  Industry duality degradation processes.  Industry duality degradation processes.  Industry degradation processes.  Industry degradation processes.  Industry duality degradation is less effective in pumping wells.  Industry degradation is less effective in pumping wells.  Industry degradation and heterogeneous soils.  Industry degradation and heterogeneous soils.  Industry degradation duality degradation is less effective in pumping wells.  Industry degradation of groundwater is already low.  Industry degradation and thereby  Industry degradation for site exposure to pumping wells.  Industry degradation due to the need soft soft of the need soft of	Groundwater Monitoring	Not effective in removing contaminants.	Easily implemented using		Retain for further
ndwater quality. May degradation processes.  Indwater quality. May degradation processes.  Indwater quality. May degradation processes.  Industrial wells all Using Vertical wells in the grained and heterogeneous soils.  Industrial wells.  In	(GW-2b):	Would provide more data on fate of	existing monitoring wells, may	\$750K	evaluation as
puire additional well  al Using Vertical Wells bydrogeology. Option is less effective in fine-grained and heterogeneous soils.  CW-3b):  CRP-3b):  Crapping (CW-4c):  Capping (CW-4c	Continued periodic monitoring	contaminants in subsurface and on natural	require additional wells.		alternative
puire additional well  al Using Vertical Wells  al Using Vertical Wells  al Using Vertical Wells  al Using Sertical Wells  al Using Nortical water using vertical water using vertical water using vertical  g wells. Requires  al Using Horizontal  al Using Horizontal  al Using Horizontal  bydrogeology. Option is less effective in functional wells.  al Using Horizontal  al Using Horizontal  bydrogeology. Option is less effective in functional wells.  con of groundwater fine-grained and heterogeneous soils.  con of groundwater fine-grained and heterogeneous soils.  con of groundwater is already low.  contaminant movement  al Using Horizonty in function is less effective in functional wells.  contaminant movement  contaminant models  contaminant movement  contaminant movement  contaminant models  contaminant  contaminant  contaminant  contaminant  contaminant  contaminant  contaminant  contaminant  contaminant  conta	of groundwater quality. May	degradation processes.	•	(\$50K)	
tion  al Using Vertical Wells  al Using Vertical Wells  al Using Vertical Wells  bydrogeology. Option is less effective in of contaminated fine-grained and heterogeneous soils.  al Using Horizontal wells.  al Using Horizontal wells.  bydrogeology. Option is less effective in of groundwater of groundwater of groundwater is treatment/disposal  c Capping (GW-4c):  streatment/disposal  c Capping (GW-4c):  streatment/disposal  c Capping is technologies reduce site. Reduces exposure, but exposure to infaminant movement  al Using Horizonty in implementation due to install a dense network of pumping wells.  bydrogeology. Option is less effective in hydrogeology. Option is less effective in the need for specialized equipment equipment  c Capping (GW-4c):  streatment/disposal  c Capping (GW-4c):  streatment/disposa	also require additional well			[\$700]	
al Using Vertical Wells hydrogeology. Option is less effective in implementation due to the need fine-grained and heterogeneous soils.  al Using Vertical hydrogeology. Option is less effective in implementation due to the need fine-grained and heterogeneous soils.  al Using Horizontal wells.  al Using Horizontal wells.  corizontal wells.  streatment/disposal fine-grained and heterogeneous soils.  creatment/disposal fine-grained statement fine to the need for the need for spec	installation				
hydrogeology. Option is less effective in functional due to the need fine-grained and heterogeneous soils.  water using vertical gwells. Requires nutdisposal al Using Horizontal water using vertical gwells. Requires fine-grained and heterogeneous soils.  al Using Horizontal by GW-3b): fine-grained and heterogeneous soils. streatment/disposal treatment/disposal creatment/disposal treatment/disposal site. Reduces exposure, but exposure to infiltration and thereby groundwater is already low.  hydrogeology. Option is less effective in the need for specialized equipment equipment to install a dense network of pumping wells. [\$2M]  cquipment a dense network of the need for the n	Removal Using Vertical Wells	Effectiveness dependent on site	Moderate difficulty in		Retain for further
to install a dense network of pumping wells.  g wells. Requires  myder using vertical g wells. Requires  mot/disposal al Using Horizontal Mydrogeology. Option is less effective in orizontal wells.  from of groundwater is treatment/disposal  t Capping (GW-4c): streatment/disposal  t Capping (GW-4c): streatment/disposal  t Capping (GW-4c): site. Reduces exposure, but exposure to infilitation and thereby groundwater is already low.  to install a dense network of pumping wells.  Difficult implementation due to sail and the need for specialized equipment to instance of the need for specialized equipment equipment to instance of the need for specialized equipment to standard construction methods site. Reduces exposure, but exposure to infiltration and thereby groundwater is already low.  (\$10K)	(GW-3a):	hydrogeology. Option is less effective in	implementation due to the need	\$6M	evaluation as
water using vertical g wells. Requires nt/disposal al Using Horizontal or of groundwater 	Extraction of contaminated	fine-grained and heterogeneous soils.	to install a dense network of		alternative
g wells. Requires  Int/disposal  al Using Horizontal  al Using Horizontal  by drogeology. Option is less effective in orizontal wells.  Interpretation and flereby groundwater is already low.  Interpretation and thereby groundwater is already low.  Interpretation in the need for specialized and the need for specialized equipment the need for specialized and need fo	groundwater using vertical		pumping wells.	(\$4M)	
nt/disposal  al Using Horizontal Effectiveness dependent on site al Using Horizontal by drogeology. Option is less effective in orizontal wells.  orizontal wells.  streatment/disposal  t Capping (GW-4c):  g technologies reduce site. Reduces exposure, but exposure to infiltration and thereby groundwater is already low.  ntaminant movement  al Using Horizontal in plementation due to alfficult implementation due to before soffective in the need for specialized equipment equi	pumping wells. Requires		)	(\$ : £ ) [\$2M]	
al Using Horizontal       Effectiveness dependent on site       Difficult implementation due to the need for specialized hydrogeology. Option is less effective in orizontal wells.       Difficult implementation due to the need for specialized tine-grained and heterogeneous soils.       Streatment fine-grained and	treatment/disposal			,	
hydrogeology. Option is less effective in the need for specialized fine-grained and heterogeneous soils.  orizontal wells.  streatment/disposal  t Capping (GW-4c):  g technologies reduce site. Reduces exposure, but exposure to infiltration and thereby from the infiltration and the i	Removal Using Horizontal	Effectiveness dependent on site	Difficult implementation due to	JAOG	Eliminate option due
orizontal wells.  streatment/disposal  t Capping (GW-4c):  g technologies reduce site. Reduces exposure, but exposure to infiltration and thereby aroundwater is already low.  orizontal wells.  (\$6M)  [\$2M]  [\$2M]  [\$2M]  Standard construction methods  standard construction methods  (\$10K)  [\$60K]	wells (GW-3b):	hydrogeology. Option is less effective in	the need for specialized	TATOO	to difficult
t Capping (GW-4c): g technologies reduce site. Reduces exposure, infiltration and thereby maminant movement	Extraction of groundwater	ine-gramed and heterogeneous soils.	equipment	(\$6M)	implementation and
t Capping (GW-4c):  g technologies reduce site. Reduces exposure, but exposure to infiltration and thereby groundwater is already low.  The capping (GW-4c):  Standard construction methods standard construction methods groundwater is already low.  (\$10K) (\$10K) (\$16K)	Requires treatment/disnosal			[\$2M]	high cost with no
t Capping (GW-4c):  g technologies reduce site. Reduces exposure, but exposure to infiltration and thereby marminant movement  t Capping (GW-4c):  Standard construction methods standard construction methods groundwater is already low.  (\$10K)  (\$10K)				1	increased effectiveness
g technologies reduce site. Reduces exposure, but exposure to standard construction methods groundwater is already low.  (\$10K)	Asphalt Capping (GW-4c):	Does not remove contaminants from the	Fasily implementable using		over vertical wells.
infiltration and thereby groundwater is already low.  Infaminant movement [\$50K]	Capping technologies reduce	site. Reduces exposure, but exposure to	standard construction methods	\$70K	asphalt/concrete cap
	surface infiltration and thereby	groundwater is already low.		(\$10K)	for further evaluation
	off-site.			[\$60K]	as alternative

			Total Cost ¹	
Process Option	Effectiveness	Implementability	(capital)	Recommendation
			[0&M]	
Air Sparging/Vapor	Effective for VOCs, however,	Difficult to implement due to the	7130	Retain for further
Extraction (GW-5b): air is	effectiveness in heterogeneous, fine-	need to install a dense network	MIC®	evaluation as
used to strip VOCs from	grained soils and fractured bedrock is	of sparging and extraction wells.	() (( 6)	alternative
groundwater in-situ. Requires	significantly reduced.	Sparging in fractured bedrock is	(MS&)	
treatment of extracted vapors.		extremely difficult and uncertain	[IVI2&]	
In-Situ Treatment Using	Effective for VOCs, however,	Difficult due to the need for		Eliminate option due
Zero-Valent Metal (GW-5d):	effectiveness in heterogeneous, fine-	specialized equipment to reach		to difficult
This options requires the	grained soils and fractured bedrock is	deep depths and to penetrate		implementability.
installation of a subsurface	significantly reduced. Must be anchored	bedrock. Site layout is such that	\$10M	•
trench to bedrock, similar to a	to bedrock.	a downgradient barrier is not		
slurry wall; however, the trench		feasible without demolition of	(\$8M)	
is filled with permeable zero-		buildings.	[\$2M]	
valent metal that will degrade			1	
contaminants to less toxic				
compounds.				

¹ NOTE: Costs were estimated by adding estimated capital costs and estimated, present-day, 30-year operation and maintenance (O&M) costs.

January 2000

# 5.2 DEVELOPMENT OF ALTERNATIVES

Remedial technologies retained for further evaluation from above have been grouped into remedial alternatives or strategies and evaluated based on relative effectiveness, relative implementability, and relative cost. Alternatives for groundwater that were retained for further evaluation include no action, access restrictions, groundwater monitoring, removal of groundwater using vertical wells, removal of groundwater using horizontal wells, asphalt/concrete capping, removal of contaminants using air sparging/vapor extraction, and insitu treatment using zero-valent metal.

# 5.2.1 No Action (GW-1)

No action is easily implemented and inexpensive; however, this alternative will not remove contaminants from the site. No remedial costs would be incurred with this option. Although risk assessment work has indicated that there is little to no health impact from contaminants in groundwater, this option is believed to be unfavorable to the local community. Due to predicted unfavorable community response, this option is eliminated from further consideration.

# 5.2.2 Institutional Controls (GW-2)

Institutional controls include using legal or physical means to restrict or limit access to the property.

# 5.2.2.1 Access Restrictions (GW-2a)

Access restrictions includes installing physical restrictions to limit access to the property, and using deed restrictions or water use/well installation restrictions that will control future land/water use. Costs incurred would be minimal, consisting of initial legal fees to implement deed restrictions. This type of management will not remove contaminants from the site. Groundwater at the site is not used as a source of potable water and there are no known wells in the area. Because the likelihood of exposure to contaminants in groundwater is already very low, this option will provide no significant benefit over the no-action alternative. However, this option is retained for further consideration as an administrative option.

# 5.2.2.2 Groundwater Monitoring (GW-2b)

Groundwater monitoring is periodic monitoring of groundwater quality on site. While this option will not actively remove contaminants from the site, it will allow an evaluation of the expected natural degradation and reduction of contaminants following removal of the source of groundwater contamination. Some remediation of groundwater contamination will be achieved following removal of the source of local contamination (i.e., soil remediation) and on-going natural degradation of contaminants. This will create a reduction over time in levels of groundwater contamination in the immediate vicinity of the site, especially in the overburden. The groundwater monitoring option will allow an observation of this decline in contaminant concentrations with time. Time required to achieve a decline in contaminant concentrations to below NYSDEC Groundwater Standards/Criteria depends on site-specific geochemical conditions. These conditions will be investigated during groundwater monitoring; however, the time-frame is estimated to be between 5 and >50 years.

This alternative is readily implemented because monitoring wells already exist on the site. Additional wells may be required to fill data gaps. Costs are low relative to groundwater treatment methods. Capital costs for well installation are estimated to be \$50,000. A yearly sampling cost is estimated to be \$23,000. The estimated, 30-year, present-day cost for this option is \$750,000. This option will be retained for further consideration as an alternative.

# 5.2.3 Removal Using Vertical Wells (GW-3a)

Removal using vertical wells involves pumping contaminated groundwater from the subsurface using wells. The water removed from the subsurface must then be treated prior to disposal. Treatment of the water can be performed using air stripping or granular activated carbon. Treated water can be disposed in the local sewer system if a permit is granted. Due to the shallow depth to groundwater and the fine-grained nature of soils, it is unlikely that reinjection of treated water will be feasible.

Groundwater removal by pumping is most effective in coarse-grained, homogeneous soil that allows water to flow through and dissolve contaminants efficiently. Groundwater remediation by

pumping is achieved by designing a network of pumping wells that will lower the water table near the wells, creating a steep groundwater gradient that will draw contaminants into the well. The network of wells is designed such that the area of groundwater that is influenced by pumping encapsulates the plume of contamination. The fine-grained and heterogeneous soils and fractured bedrock at the site make pumping inefficient as a means of contaminant removal. Heterogeneity decreases the possibility of permanent cleanup because residual contaminants in fine-grained areas will tend to stay sorbed onto subsurface particles rather than diffusing into the water. This tends to leave pockets of residual contaminants that will serve as a continuing source of contamination. When the pumping system is shut down, these contaminants will diffuse into the surrounding groundwater, causing a rebound of contaminant concentrations. This cycle can be repeated for decades before cleanup is achieved. Similarly, contaminants can remain trapped in small, poorly connected fractures in bedrock and act as a residual source of contamination.

A very dense network of pumping wells would be needed to lower the water table on-site enough to remove contaminated groundwater from the entire area of the site because the radius of influence of each well in fine-grained soils is small (estimated to be less than 100 ft). Radius of influence of site-specific wells would need to be determined through pilot testing prior to system design. Assuming an approximate radius of influence of 100 ft, hundreds of wells could be required to remove contaminated groundwater from the site. Capital costs for pumping well and treatment system installation are estimated to be \$4million. Estimated costs for 30 years of operation and maintenance are estimated to be \$2million. Time for cleanup is estimated to be between 5 and >50 years.

Due to the fine-grained and heterogeneous nature of on-site geological conditions and the regional extent of groundwater contamination, it is not likely that any type of groundwater pumping will be feasible for groundwater cleanup within a reasonable time frame (less than 50 years). Potential community acceptance of groundwater pumping is unknown, but is likely unfavorable due to the uncertainty of results and long time frame for cleanup. Due to difficulties in implementation and limited effectiveness, this option will not be considered further.

# 5.2.4 Removal Using Horizontal Wells (GW-3b)

Removal using horizontal wells involves pumping contaminated groundwater from the subsurface using wells. The only difference between this option and the option using vertical wells is the orientation of the extraction wells. Horizontal wells will allow a slightly improved area of influence for each well, but may not be able to attain the same effective depth as vertical wells. Costs and time frame for cleanup are estimated to be similar to those for vertical wells, with slightly higher capital expenses due to more expensive drilling methods. Due to similar difficulties in implementation and limited effectiveness due to the fine-grained and heterogeneous nature of soils on site, this option is also eliminated from further consideration.

# 5.2.5 Asphalt/Concrete Capping (GW-4c)

Capping does not remove contaminants from the site, but reduces exposure by installation of a physical barrier over the area of contamination. Capping also reduces infiltration of precipitation that can contribute to the movement of contaminants downward from soil into groundwater. This method is effective in reducing potential human health effects due to exposure; however, at this site human health effects are already negligible, so this option will add no real remedial value. It should be noted that the majority of the area of overburden groundwater contamination is already covered by asphalt parking lots, roads, sidewalks, etc and/or buildings. Contamination in deeper bedrock is more than 17 feet below ground surface, so capping would provide no real additional protection in areas of bedrock groundwater contamination. Costs are estimated to be low, consisting of an initial expenditure of \$10,000 for paving and an estimated 30-year cost of \$60,000 for asphalt repair and maintenance. Due to the lack of real value realized by implementing this option, it will not be considered further.

# 5.2.6 Air Sparging/Vapor Extraction (GW-5b)

Air sparging is a method where air is injected into subsurface groundwater below the bottom of the contaminant plume via sparging wells. As the air bubbles upward through the plume of contaminated groundwater, VOCs are partitioned from the water into the air. The VOC-laden air then moves into the shallow unsaturated zone, where it is removed via vapor extraction wells. Vapors then require treatment prior to release. This technology is proven effective for removal of VOCs; however, its effectiveness is dependent on the ability of air to flow throughout the contaminated area. At this site the fine-grained and heterogeneous nature of soils and the presence of fractured bedrock will significantly reduce the effectiveness of this technology. Heterogeneity decreases the possibility of permanent cleanup because residual contaminants in fine-grained areas will tend to stay sorbed onto subsurface particles rather than diffusing into the air stream. This tends to leave pockets of residual contaminants that serve as a continuing source of contamination. When the sparging system is shut down, these contaminants will diffuse into the surrounding groundwater, causing a rebound of contaminant concentrations. This cycle can be repeated for decades before any cleanup is achieved. In addition, like groundwater pumping, the fine-grained and heterogeneous nature of soils would require the use of a very dense network of sparging/extraction wells.

Cleanup of contamination in the bedrock would be impractical using this technology, because of the difficulty in moving air efficiently through a heterogeneous network of fractures. The potential community acceptance of this technology is unknown, but is not likely to be favorable due to the uncertainty of results and long time-frame for cleanup. Assuming an approximate radius of influence of 100 ft for extraction and sparging wells, hundreds of wells could be required to remove contaminants from the site. Capital costs for well and treatment system installation are estimated to be \$3million. Estimated costs for 30 years of operation and maintenance are estimated to be \$2million. Time for cleanup is estimated to be between 5 and >50 years. Due to difficulties in implementation and limited effectiveness, this option will not be considered further.

# 5.2.7 In-Situ Treatment Using Zero-Valent Metal (GW-5d)

Reactive barriers are in-situ passive systems that allow groundwater to naturally pass through for treatment. Zero-valent metal technology has proven effective in destruction of chlorinated solvents. It is mechanically simple, long term, and cost effective for treatment of groundwater containing chlorinated solvents. The zero-valent metal formulation in the in-situ barrier causes chlorine atoms to be replaced by hydrogen atoms, effectively destroying chlorinated solvent compounds. The metal formulation is installed as a permeable treatment wall in an excavated

trench across the flow path of a plume of VOC-contaminated groundwater. The VOCs are transformed by reductive dehalogenation as they migrate through the wall. The layout of the property limits the location of the wall to the western and southern property boundaries, unless the building was demolished. However, the extent of groundwater contamination extends beyond the western and southern boundaries, limiting the ability of this technology to effectively clean up contaminated groundwater in the area unless the barrier was installed off-site. In addition, difficulties in trenching into bedrock to achieve cleanup of deeper bedrock groundwater make implementation very difficult. Assuming a barrier trench length of 720ft, a depth of 30 ft, and a thickness of 3 ft and assuming that the property would be purchased and the building demolished to accommodate trench installation, capital costs for system installation are estimated to be \$8million. Estimated costs for 30 years of operation and maintenance are estimated to be \$2million. Time for cleanup is estimated to be between 5 and >50 years. Due to difficult implementation and limited effectiveness in bedrock, this technology will not be considered further.

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# 6. RECOMMENDED ALTERNATIVES

This section discusses the recommended alternatives for groundwater and how each alternative meets ARARS.

# 6.1 GROUNDWATER MONITORING AND DEED RESTRICTIONS

Two major factors impact the ability of currently available groundwater remediation technologies to reduce contaminant concentrations below the NYSDEC Groundwater Standards/Criteria:

- 1. The potential presence of off-site, upgradient sources of contamination, and
- 2. The fine-grained and heterogeneous nature of on-site soils and the presence of fractured bedrock.

Removal of contaminated soils during the IRM removed potential on-site sources of contaminants to groundwater; however, potential off-site sources may remain that could continue to contribute to groundwater contamination. A groundwater remediation system that involves removal or extraction of contaminants may not achieve cleanup if off-site sources remain that will continue to contribute contaminants to groundwater.

The remedial action objective for groundwater is to reduce contaminant concentrations in groundwater in the short-term. Ultimately, the objective is to remediate contaminated groundwater to meet NYSDEC Groundwater Standards/Criteria. The short-term objective will likely be attained through removal of the source of on-site contamination conducted during the IRM. This objective meets the goal of ensuring continued protection of human health and the environment and attaining an overall reduction in groundwater contaminant concentrations with time.

The alternatives for groundwater that were evaluated in Section 5.0 included no action, access restrictions, groundwater monitoring, removal using horizontal wells, air sparging/vapor extraction, and asphalt/concrete capping. Of these alternatives, only groundwater monitoring and deed restrictions were retained as viable options for groundwater. Removal using horizontal

wells and air sparging/vapor extraction involve removal or extraction of contaminants that would be impractical given current site conditions. Because exposure to groundwater contaminants is minimal and most of the site is already covered by asphalt/concrete surfaces or buildings, asphalt/concrete capping is not an alternative that will provide any additional protection compared to current on-site conditions. No action is a viable alternative, but BP America wishes to take reasonable and practical steps to ensure that groundwater contamination on the former Carborundum Company property is managed appropriately.

The groundwater monitoring option will allow an evaluation of groundwater condition with time. This monitoring information can be used by BP America and the NYSDEC to evaluate the need for any further action at the site. Deed restrictions can be used in combination with groundwater monitoring as a management option for the site.

Monitoring should consist of periodic groundwater sampling for a specific monitoring period of several years to document on-site groundwater conditions as they change with time. At the end of the specified monitoring period, the need for further monitoring should be evaluated. Monitoring frequency and other details will be provided at a later date in a detailed groundwater monitoring plan.

# 6.2 COMPLIANCE WITH ARARS

The IRM for soil complied with the ARARS identified in Section 3 for soil. Contaminated soils were removed from identified areas of contamination and backfilled with clean material so that soils on the site comply with the NYSDEC Soil Cleanup Objectives. There are some exceptions to this, which are described in Section 7.

The groundwater monitoring and deed restrictions alternative may not result in compliance with ARARS through cleanup of groundwater to meet NYSDEC Groundwater Standards/Criteria in less than 50 years. However, due to the potential presence of continuing sources of groundwater contamination upgradient from the site and to the complicated geology of the site, more

aggressive and costly cleanup options may not effectively result in compliance with the ARARS in less than 50 years, either.

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### 7. SUMMARY OF IRM RESULTS

An Interim Remedial Measure (IRM) has been implemented in cooperation with the NYSDEC for contaminated soils at the former Carborundum Company facility. The IRM included excavation of contaminated soils from the site and off-site disposal at RCRA approved Part 360 and 373 landfills. This alternative was determined to be better than other evaluated alternatives because of its low cost, permanence, effectiveness, ease of implementation, acceptance by the community and because excavation is a remedy that will remove contaminants from the site immediately. The NYSDEC supported the IRM in a document entitled Interim Remedial Measure Decision Document, dated January 1999. By removing contaminated soils from the site, identified sources of potential groundwater contamination were also removed from the former Carborundum Company property.

The overall objective of the IRM was to affect an improvement in groundwater quality with time following source removal. The IRM report (DE&S, 1999c) provides more detailed results.

The specific objectives of the IRM included:

- i) Refine the extent of known soil contamination to allow cost-effective and efficient removal of soils. This objective was achieved through a borehole drilling and soil sampling program to refine the extent of contamination.
- ii) Excavate contaminated soils and test to determine appropriate disposal options. This objective was achieved through a test pit program that allowed pre-characterization of soils for disposal.
- iii) Dispose of soil at appropriate facility.

The plans and specifications and health and safety plan document developed for the IRM soil excavation program includes a description of the air quality monitoring program, which meets

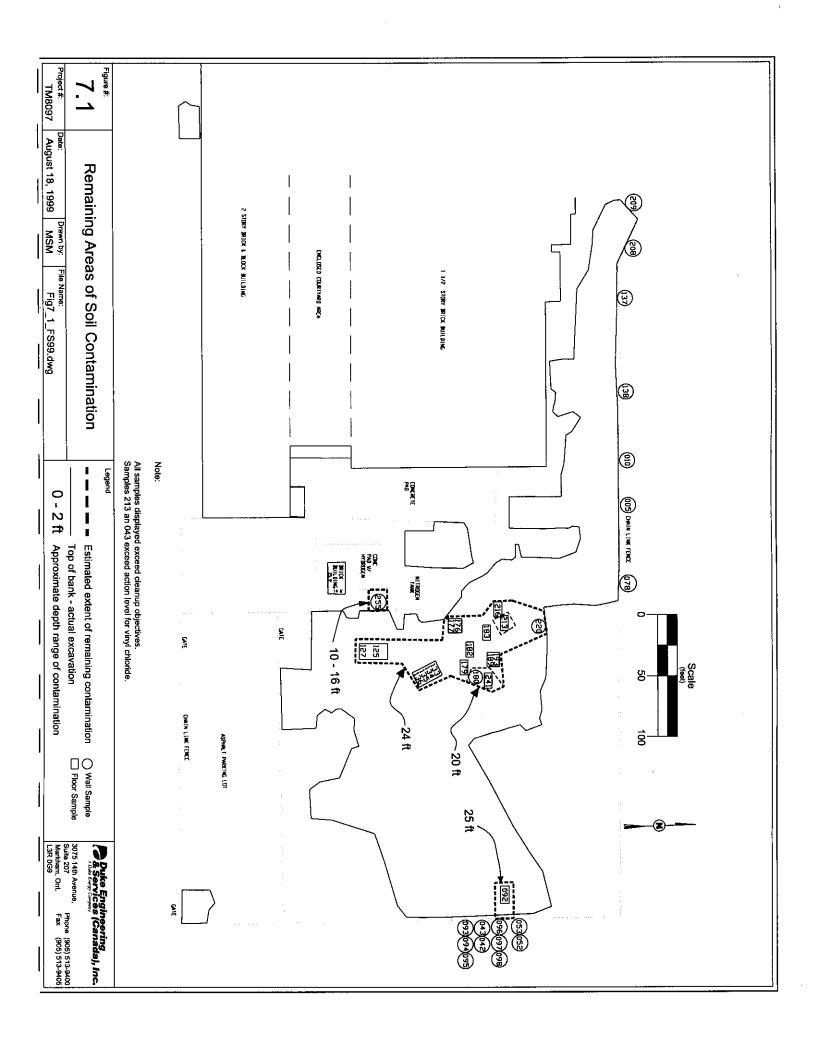
the NYSDOH Community Air Monitoring Plan and the NYSDEC TAGM #4031 for dust control.

A total of 35,606 tons, or approximately 23,700 yd³ of soil including 2,150 tons of action level soils was excavated and removed from the site between May and August 1999. A total of 307,600 gallons of excavation water, groundwater that had seeped into the excavations, was disposed and treated at the City of Niagara Falls Wastewater Treatment Plant.

The goal of the IRM was to remove contaminated soils from the site. This was achieved, however, verification sampling results indicate that a few areas of soil remaining on the site contain COC's above cleanup objectives. This is due to site conditions that prevented the removal of all contaminated soils from the site in some areas. Areas where contaminated soils remain on-site include: Areas 1A/1C, 1D-extension/2C and 2A (see IRM report, DE&S, 1999c). Figure 7-1 depicts the remaining areas of soil contamination on site. Verification soil samples (see IRM report for specific information on sample numbers and results) collected from the floors and walls of the excavations that contain COC concentrations above NYSDEC Soil Cleanup Objectives are depicted on the figure.

Several verification samples collected from the north wall of areas 1A/1C exceeded the clean-up objective for trichloroethene and/or PAHs. These samples do not represent contaminated soil remaining on-site because the north wall of areas 1A and 1C extended to the north property boundary.

Approximately 700 yd³ of non-hazardous soil containing VOCs remains on-site below 20ft in depth in areas 1D-extension/2C. Verification sampling results also indicate that one verification sample contains vinyl chloride above the action level in area 1D-extension on the floor below the former location of the solvent storage area at 24 ft depth. An estimated 40 yd³ of action level soil remains on-site at this location. Additional excavation in these locations was not possible because of significant concern for reduced slope stability near the liquid nitrogen above-ground storage tank (AST) that prevented extension of the excavation below 24 ft depth.



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Verification sampling results indicate that non-hazardous soil remains in area 2A in four locations: at the east wall corresponding to the property boundary from 0 to 16 ft in three samples, on the west wall near the hydrogen gas cylinders from 10 to 16 ft in one sample, on the floor in the north-east corner in one sample at 24 ft, and the floor in the west end in six samples at 18 to 24 ft.

Excavating further east in Area 2A was not conducted because the excavation extended to the east property boundary. An estimated 800 ft² area of non-hazardous soil remains between 0-16 ft in depth on the east property boundary. Excavating further west was not possible due to the proximity of the hydrogen gas cylinders. An estimated 60 yd³ of non-hazardous soil remains between 10-16 ft in depth on the west wall. Excavating deeper than 24 ft in the north-east corner was not possible because of significant concern for reduced slope stability. An estimated 80 yd³ of non-hazardous soil remains below 24 ft in this area. Excavating deeper than 18 to 24 ft on the floor in the west end was not possible due to the presence of loose sands, silts, gravels and boulders in this area that caused a significant concern for slope stability; the proximity of the hydrogen gas cylinders and the liquid nitrogen AST; and significant groundwater seepage that compounded slope stability issues. The estimated volume of non-hazardous soils remaining on the floor below 18ft depth in the west end of area 2A is 1,100 yd³.

Verification sampling results also indicate that action level soil remains in area 2A on the east wall in one sample. An estimated 150 ft² area of action level soil remains between 10-16 ft depth in this area. Excavating further east was not conducted because the verification sample was collected at the east property boundary.

An estimated total of 1,980 yd³ of contaminated soil remains on-site at depths below 10 feet. The volume of soil remaining represents approximately 8% of the total volume of identified contaminated soil. The objective of the IRM was to affect an improvement in groundwater quality with time following source removal. Over 90% of contaminated soils have been removed from the property, including over 2,000 tons of action level soil. A significant portion of the

source of contamination to groundwater has been removed from the site, which will allow the objective of the IRM to be attained.

Other soil cleanup technologies such as soil vapor extraction, soil flushing, biodegradation, insitu vitrification or stabilization cannot reasonably be applied to remediate the small areas of remaining contaminated soils at the site due to site-specific soil conditions that make these technologies technically impractical. The soil alternative that was determined most effective at the site, excavation and removal, was applied until restricted by its physical limitations. The IRM was considered successful; therefore, no further action will be applied to the 1,980 yd³ of contaminated soil left on-site pending groundwater monitoring results. If groundwater contaminant concentrations are reduced significantly over time, then the goal of the IRM will have been achieved.

Remaining areas of soil contamination on site can be monitored to ensure that they do not have a significant adverse impact on the environment through groundwater monitoring. Groundwater monitoring wells will be installed as part of the FS groundwater monitoring program, in areas where soil contamination remains on site. This will allow an evaluation of the impact of small areas of remaining soil contamination on the condition of groundwater at the site. This impact is not expected to be significant.

### 8. REFERENCES

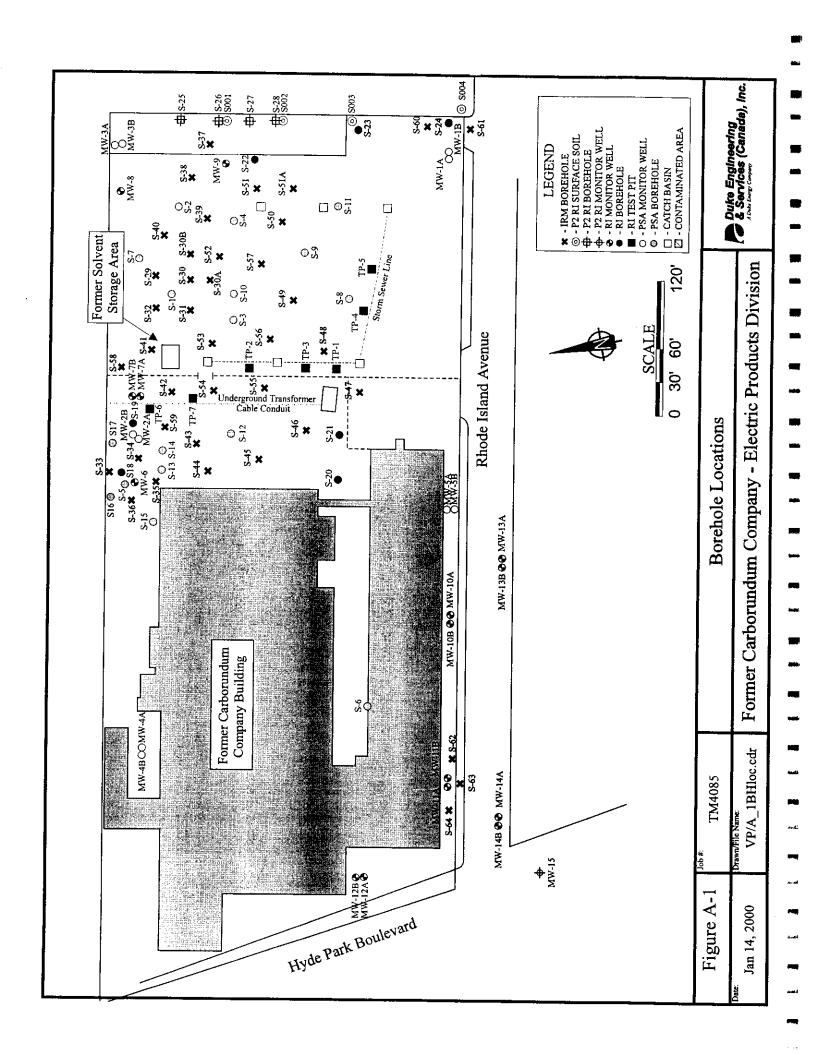
Interim Remedial Measure Work Plan for the Former Carborundum DE&S (1999a) Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036. Plans and Specifications for Execution of the Interim Remedial DE&S (1999b) Measure for the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036. Execution of the Interim Remedial Measure for the Former Carborundum DE&S (1999c) Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036 Phase II Remedial Investigation of the Former Carborundum DE&S (1998) Company Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, NY. Site No. 932036. Earth Dimensions Inc. Soils Report Preliminary Site Assessment Hyde Park Facility, (1985)Carborundum Globar Manufacturing, Niagara Falls, New York. Report on the Preliminary Site Assessment of the Carborundum **INTERA** Company - Electric Products Division, Hyde Park Facility, Town of (1993)Niagara, Niagara County, NY. Prepared for The Carborundum Company Site No. 932036. **INTERA** Remedial Investigation of the Former Carborundum Company Electric Products Division, Hyde Park Facility, Town of Niagara, (1997)Niagara County, NY. Site No. 932036. Water Quality Regulations for Surface Waters and Groundwater NYSDEC-NYSDEC (1991a) 6NYCRR, Part 703 Ambient Water Quality Standards and Guidance Values NYSDEC TOGS 1.1.1 NYSDEC (1991b) NYSDEC (1992) Determination of Soil Cleanup Objectives and Cleanup Levels NYSDEC TAGM HWR-92-4046, November 16, 1992; revised May 5, 1998. NYSDEC (1992) "Contained-In" Criteria for Environmental Media, NYSDEC TAGM HWR-92-3028, November 30, 1992. NYSDEC (1999) Interim Remedial Measure Decision Document, January 1999. URS Consultants Inc. Engineering Investigations at Inactive Hazardous Waste Sites, (1990)Preliminary Site Assessment, Carborundum Company Globar Plant

Site No. 932036 Niagara (T), Niagara (C), Prepared for: New York State Department of Environmental Conservation Division of Hazardous Waste Remediation.

USEPA (1989)

Risk Assessment Guidance for Superfund Volume 1 Human Health Evaluation Manual (Part A) Interim Final. EPA/540/1-89-002.

### APPENDIX A Summary of Soil Sampling



	Well or B	orehole No	., Soil Sam	ple Depth	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (μg/Kg)	and Concen	tration (µg	/Kg)			
200	MW-1B	MW-1B   MW-2B   MW-3A	MW-3A	MW-4B	MW-4B MW-5B	9-MM	9-MW	MW-7B	MW-7B	Cleanup	Action
					-					Objective	Level
	0-23.3	4-6	0-20,	0.5-	2-4,	0-2,	10-12,	0-2,	14-16'	(µg/Kg) ¹	$(\mu g/Kg)^2$
				23.5						) )	) )
Vinyl chloride	<b>√</b> 11	<i>\$</i> 1	<13	<11	<13	<10	<10	<5.0	<5.0	200	360
Methylene chloride	<11	<51	<13	<11	<13	12	<10	<5.0	<5.0	150	93,000
Trichloroethene	<b>√11</b>	51	2J	18	<13	120	75	160	<5.0	880	64,000
Acetone	28	483	<13	26J	<13	65	<10	<5.0	<5.0	200	$8x10^{\circ}$
1,2-Dichloroethene	11	157	<13	20	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	210	<10	COL	<5.0	410	$2.8x10^{\circ}$
(total cis and trans)	<b>1 1 1 1 1 1 1 1 1 1</b>	7	717	7	7	017	27/	) ) (1) (1) (1)	?		(total)
Toluene	<11	<51	<13	<11	<13	5.2J	<10	150	3.1J	2,100	$20x10^{\circ}$
Ethyl benzene	<11	370	<13	<11	<13	<10	<10	210	<5.0	7,700	8x10°
Total xylenes	<11	1,200	<13	<11	<13	<10	<10	1,610	<5	1,680	$2x10^{8}$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective

	Well or E	Well or Borehole No., Soil Samp	o., Soil Sar		n ft BGS	e Depth in ft BGS, and Concentration (ug/Kg)	tration (µg	1/Kg)			
202	8-MM	MW-8	6-MM	Σ	MW-	MW-11B	MM-	MW.	MM-	Cleanup	Action
					10B	0.5-2'	11B	12B	13B	Objective	Level
	0-2,	14-16'	0-2,	12-14,	18-20,		.8-9	16-16.8	0-5,	$(ug/Kg)^1$	$(ug/Kg)^2$
Vinyl chloride	<10	<10	<10	$<1,600^{(3)}$	<10	<1,300 ⁽⁵⁾	<10	<10	<10	200	360
Methylene chloride	2.83	<10	<10	<1'900 ₉ :	<10	<1,300 ⁽⁹⁾	<10	<10	<10	150	93 000
Trichloroethene	3.01	3.03	260	3,400	<10	<1,300 ⁽³⁾	<10	<10	<10	880	64 000
Acetone	<10	59	<10	<1.600 ⁽²⁾	51	<1.300	<10	<10	<10	200	82100
1,2-Dichloroethene	5	,		(3)		167			Ç.	202	0010
(total cis and trans)	01>	01>	7	<0.0911>	4.1.	<1,300%	<10	3.51	<10	410	4.0XIU
Toluene	<10	<10	16	<1,600	<10	<1,300	<10	<10	210	2 100	(101a1)
Ethyl benzene	<10	<10	<10	<1,600	<10	<1,300	<10	<10	<u> </u>	7,700	8x10°
Total xylenes	<10	<10	19	<1,600	<10	001.6	<10	<10	<10	1.680	2x108
						CALLEGE CONTRACTOR OF THE CONT				, , , ,	

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
    3. When the sample quantitation limit is greater than the clean-un objective.
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

COC         MW-         MW-         S-1F         S-1N         S-2F         S-2N         S-3F         S-3N         Clear Object           13B         14A         14A         14A         4-16         0-10°         10-16°         0-4°         8-12°         0bject           Vinyl chloride         <10         <10         <10         40         4-16°         0-10°         10-16°         0-4°         8-12°         (µg/R)           Vinyl chloride         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10         <10		Well or E	sorehole No	o., Soil Sar	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	n ft BGS,	and Concer	ntration (µg	y/Kg)			
13B   14A   14A   14A   14A   16   0.5-4°   4-16°   0-10°   10-16°   0-4°   8-12°   0-10°   10-12°   0-2°   16-18°   0.5-4°   4-16°   0-10°   10-16°   0-4°   8-12°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°   0-10°	202	MM-	MM-	MM-	S-1F	S-1N	S-2F	S-2N	S-3F	S-3N	Cleanup	Action
10-12'   0-2'   16-18'   0.5-4'   4-16'   0-10'   10-16'   0-4'   8-12'   (		13B	14A	14A							Objective	Level
e10         <10         <10         400J         4J         <12         <12         <1,400°)           e         <10         <10         <10         <10         <10         <11         <2J         <1,400°)           <10         <10         <10         <10         <2J         <2J         <2J,400°)           <10         <10         <10         <2J         <2J         <2J         <2J,000°           <10         <10         <10         <10         <12         <12         <2J         <2J,000°           <10         <10         <10         <10         <10         <12         <12         <140         <1,400°           <10         <10         <10         <10         <10         <12         <12         <140         <1,900°           <10         <10         <10         <10         <10         <12         <12         <140         <1,900°           <10         <10         <10         <10         <10         <12         <12         <140         <1,900°           <10         <10         <10         <10         <10         <10         <12         <12         <12         <12         <12         <1		10-12,	0-2,	16-18'	0.5-4'	4-16'	0-10,	10-16	0-4,	8-12'	$(\mu g/Kg)^1$	(µg/Kg) ²
e         <10         <10         <60         0.8J         <12         <12         <1,400 ^G )           <10	Vinyl chloride	<10	<10	<10	400J	43	<12	<12	<12	$< 1,400^{(3)}$	200	360
<10         <10         <10         300,000         560         1J         1J         <2J         23,000           <10	Methylene chloride	<10	<10	<10	09>	0.8J	<12	<12	<12	<1,400(3)	150	93,000
<10         <10         <10         170         13         <12         9J         40J         6,100           <10	Trichloroethene	<10	<10	<10		560	11	1.1	<2J	23,000	880	64,000
<10         <10         <10         <10         37,000         360         <12         <12         560         3,300           <10	Acetone	<10	<10	<10	170	13	<12	9,1	40J	6,100	200	$8x10^{\circ}$
<10         <10         <10         84,000         16J         <12         <12         <12         94         10,000           <10         <10         <10         <000         <10         <12         <12         <140         1,900           <10         <10         <10         <10         <10         <12         <12         <17,000	1,2-Dichloroethene (total <i>cis</i> and <i>trans</i> )	<10	<10	<10	37,000	360	<12	<12	995	3,300	410	2.8x10 ⁶ (total)
39         40         90         000         39         412         42         1900           410         410         400         600         110         412         412         330         17         100	Toluene	<10	<10	<10	84,000J	16J	<12	<12	94	10,000	2,100	$20x10^{6}$
<10   <10   <10   <10   400,0001   110   <12   330   17,000	Ethyl benzene	<10	<10	<10		39J	<12	<12	140	1,900	7,700	$8x10^{6}$
the Control of the Co	Total xylenes	<10	<10	<10	400,000T	110	<12	<12	330	17,000	1,680	$2x10^{8}$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective

	Well or E	orehole N	Well or Borehole No., Soil Samp	ple Depth	in ft BGS,	ple Depth in ft BGS, and Concentration (µg/Kg)	ntration (µg	(Kg)			
202	S-4F	S-4N	S-5F	S-5N	S-6F	N9-S	S-7F	S-7N	S-8F	Cleanup	Action
	10-12,	12-14'	0-5,	6-16'	0-8,	8-18,	0-2,	8-10,	2.43	Objective	Level
Vinyl chloride	<13	<12	<1,100"	<11	<12	<12	<12	<12	<u>~12</u>	200 200	(84/8H)
Methylene chloride	0.91	1.1	_d001;T>	<11	13	<12	<12	<12	<12	150	93 000
Trichloroethene	23	23,000	23,000 17,000;	66	2.3	83	51	3J	<12	088	64 000
Acetone	<13	19J	<1,100 ¹² .	√ 11	<12	<12	<12	<12	<12	200	8x10°
1,2-Dichloroethene	16	1.7001	SKAT	20	72	9	,	5	,		2.8x10°
(total cis and trans)	3			27	71/	?	c c	71>	71>	410	(total)
Toluene	<13	34	<1,100	<11	<12	<12	<12	<12	<12	2.100	20x10°
Ethyl benzene	7.1	120	120J	<11	<12	<12	<12	<12	<12	7,700	8x10°
Total xylenes	4J	150	8001	<11	<12	<12	<12	<12	<12	1,680	2x10 ⁸
								3			

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
    3. When the sample quantitation limit is greater than the clean, in obia
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	Well or B	orehole No	Well or Borehole No., Soil Samp	ple Depth	le Depth in ft BGS, and Concentration (µg/Kg)	und Concent	ration (μ	g/Kg)			
202	N8-S	S-9F	N6-S	S-10F	S-10N	S-11F	S-11N S-12F	S-12F	S-12N	Cleanup	Action
										Objective	Level
	10-12,	2-4,	10-12,	2-4'	12-14,	2-4,	12-14	1.5-2'	12-14'	$(\mu g/Kg)^1$	$(\mu g/Kg)^2$
Vinyl chloride	<12	<12	<13	<12	$<1,400^{(3)}$	$<1,300^{(3)}$	<13	$<1,500^{(5)}$	<27	200	360
Methylene chloride	<12	<12	<13	<12	<1,400 ⁽³⁾	<1,300 ⁽³⁾	<13		<27	150	93,000
Trichloroethene	9.1	<12	23	<12	<1,400 ⁽³⁾	<1,300 ⁽³⁾	<13		310	088	64,000
Acetone	<12	<12	<13	57	<1,400 ⁽³⁾	<1,300 ⁽³⁾	<13	$<1,500^{(3)}$	<27	200	8x10°
1,2-Dichloroethene	5.5	<12	28	<12	<1,400 ⁽³⁾	<1,300 ⁽³⁾	<13	7.600	255	410	2.8x10°
(lotal cis and trans)						100 mm					(total)
Toluene	<12	<12	<13	<12	<1,400	<1,300	<13	300J	<27	2,100	$20x10^{6}$
Ethyl benzene	<12	<12	<13	20	2,400	<1,300	<13	<1,500	<27	7,700	8x10°
Total xylenes	<12	<12	<13	<12	720J	<1,300	<13	2,900	<27	1,680	2x10 ⁸

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective

	Well or	Well or Borehole No., Soil Samp	., Soil San	ple Depth	in ft BGS,	and Conce	le Depth in ft BGS, and Concentration (μg/Kg)	/Kg)			
202	S-14F	S-14F S-14N	S-15F	S-15N	S-16F	S-16N S-17F	S-17F	S-17N	S-18	Cleanup	Action
	,	\$ 10,	, 6	1, 1, 4,	ic y c	ć	;			Objective	Level
	7-1	0-10	0.3-2	12-14	0.5-2	0-8	0.5-4	4-14′	0-2,	$\mid (\mu \mathrm{g/Kg})^{\scriptscriptstyle{1}} \mid$	$(\mu g/Kg)^2$
Vinyl chloride	<45	<1,400	<13	<u>  &lt;11</u>	<12	<13	$<1,400^{(3)}$	<12	<30	200	360
Methylene chloride	<45	<1,400 ⁽³⁾	<13	<11	3.5	<13	<1,400 ⁽²⁾	<12	<30	150	93.000
Trichloroethene	25	4,000	3J	6,7	93	2.5	1	4.1	210	880	64,000
Acetone	<45	7600FiT>	<13	<11	<12	<13	<1,400	<12	<30	200	8x10°
1,2-Dichloroethene	<45	380J	<13	\rac{\lambda}{11}	<12	<13	<1.400(3)	<12	<30	410	2.8x10 ^b
(total cis and trans)							<b>)</b>	2	) )	2	(total)
Toluene	<45	<1,400	<13	<11	<12	<13	<1,400	<12	98	2,100	$20x10^{6}$
Ethyl benzene	<45	<1,400	<13	<11	<12	<13	<1,400	<12	<30		8x10 ⁶
Total xylenes	,	ı	1	1	1	-	1		<30	1,680	$2x10^{8}$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
  - When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit. d m

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective

S-18         S-19         S-20         S-20         S-21         S-21         S-22         C-2         S-22         C-2         S-22         S-22         C-2         S-22         S-22         C-2         S-22         C-2         S-22         C-2         S-22         S-22         C-2         S-22         S-22         C-2         S-22         C-2         S-20         S-2         S-		Well or E	3 orehole No	Soil San	nple Depth	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (μg/Kg)	and Conce	ntration (μչ	g/Kg)			
4-6'         2-4'         18-20'         6-2'         18-20'         6-8'         6-8'         0.5-2'         4-6'         6             condended   con	202	S-18	S-19	S-19	S-20	S-20	S-21	S-21	S-22	S-22	Cleanup	Action
4-6'         2-4'         18-20'         6-2'         6-8'         0.5-2'         4-6'         (6-8')         0.5-2'         4-6'         (7)           solvide         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0         \$5.0											Objective	Level
oride         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0 <t< td=""><td></td><td>4-6,</td><td>2-4,</td><td>18-20,</td><td>0-2,</td><td>18-20,</td><td>0-2,</td><td>.8-9</td><td>0.5-2</td><td>4-6,</td><td>$(\mu g/Kg)^1$</td><td>$(\mu g/Kg)^2$</td></t<>		4-6,	2-4,	18-20,	0-2,	18-20,	0-2,	.8-9	0.5-2	4-6,	$(\mu g/Kg)^1$	$(\mu g/Kg)^2$
loride <5.0 <5.0 <5.0 <5.0 <5.0 <5.0 <5.0 <5.0	Vinyl chloride	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	200	360
le         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <	Methylene chloride	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	150	93,000
hene <5.0 <5.0 <5.0 <5.0 <5.0 <5.0 <5.0 <5.0	Trichloroethene	<5.0	<5.0	<5.0	45	2.8J	14	<5.0	71	11	088	64,000
hene rans)         <5.0         <5.0         <5.0         <5.0         <5.0         3.4J         <5.0           rans)         <5.0	Acetone	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	150	200	8x10°
<5.0         <5.0         17         <5.0         1.31         2.81         <5.0         9.6         3.1J           <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         3.8J         <5.0           <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0	1,2-Dichloroethene (total cis and trans)	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	3.4J	<5.0	410	2.8x10° (total)
<5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0         <5.0 <th< td=""><td>Toluene</td><td>&lt;5.0</td><td>&lt;5.0</td><td>17</td><td>&lt;5.0</td><td>1.3J</td><td>2.8J</td><td>&lt;5.0</td><td>9.6</td><td>3.1J</td><td>2,100</td><td>$20x10^{6}$</td></th<>	Toluene	<5.0	<5.0	17	<5.0	1.3J	2.8J	<5.0	9.6	3.1J	2,100	$20x10^{6}$
<5.0   <5.0   <5.0   <5.0   <5.0   <5.0   <5.0   <5.0	Ethyl benzene	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	3.83	<5.0	7,700	$8x10^{\circ}$
The state of the s	Total xylenes	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	28.2	<5.0	1,680	$2x10^8$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	Well or E	3 orehole N	o., Soil Sam	ple Depth	in ft BGS,	and Concer	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	/Kg)			
202	S-23	S-23	S-24	S-24	S-25	S-26	S-27	S-28	S-29	Cleanup	Action
	÷		;		; ;	;		,	,	Objective	Level
	7-7	12-14	7-7	12-14	8-107	4-6′	10-12	8-10,	1-2,	$ (\mu g/Kg)^1 $	$(\mu g/Kg)^2$
Vinyl chloride	<10	<10	<10	<14	<12	<12	33	<12	22J	200	360
Methylene chloride	<10	19	<10	<b>7</b> 14		-	1		<6.1	150	93,000
Trichloroethene	<10	130	<10	<14	99	099	630	9>	393	880	64,000
Acetone	<10	130	: · · · 09 <i>L</i> .	130	6.1	46J	53	<12	34J	200	8x10°
1,2-Dichloroethene	<10	V10	<10	Z17	7	76	000	7	75 01	410	2.8x10°
(total cis and trans)	2	2.	21.	<b>†</b>	?	0 4	3	9	73.03	410	(total)
Toluene	<10	5.2J	<10	2.3J	9>	150	180	9>	<6.1	2,100	20x10°
Ethyl benzene	<10	<10	<10	<14	9>	13	99	9>	<6.1		8x10°
Total xylenes	<10	<10	<10	<14	9>	70	220	9>	3.53		$2x10^8$
										-	

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	Well or B	orehole N	lo., Soil Sam	ple Deptl	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	nd Concer	ntration (με	;/Kg)			
202	S-29	S-29	S-30	S-30	S30A	S30B	S31	S31	S32	Cleanup	Action
		_								Objective	Level
	,9	15,	1-2,	12,	1-2,	0-1,	1-2,	10,	1-2,	$(\mu g/Kg)^1$	$(\mu g/Kg)^2$
Vinyl chloride	<6.0	<6.2	<590(3)	<6.1	<630 ⁽³⁾	0.9>	<6.2	<6.0	0.9>	200	360
Methylene chloride	0.9>	<6.2	<590 ⁽³⁾	<6.1	<630 ⁽³⁾	<6.0	<6.2	0.9>	<6.0	150	93,000
Trichloroethene	6.4	69	14,000	110	008'6	71	120J	48	6.8J	088	64,000
Acetone	<7.0	<8.2	<590UJ ⁽³⁾	<6.1	<630UJ ⁽²⁾	7.33	<24	4.03	0.9>	200	$8x10^{b}$
1,2-Dichloroethene	181	36	2.000	30 7I	210	16	100T	14	18.6	410	$2.8x10^{6}$
(total cis and trans)	G F	0,1				01	6001	<b>-</b>		-110	(total)
Toluene	<6.0	<6.2	<590	<6.1	<630	0.9>	<6.2	0.9>	0.9>	2,100	$20x10^{6}$
Ethyl benzene	<6.0	<6.2	<590	<6.1	<630	0.9>	<6.2	<6.0	0.9>	7,700	$8x10^{6}$
Total xylenes	0.9>	<6.2	340J	<6.1	<630	7.5	<6.2	0.9>	0.9>	1,680	$2x10^8$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - .. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective



	Well or	Well or Borehole No., Soil Sampl	., Soil San	ıple Depth	in ft BGS,	and Conce	le Depth in ft BGS, and Concentration (µg/Kg)	/Kg)			
202	S32	S33	S33	S34	S34	S35	S35	S36	S36	Cleanup	Action
	12,	0-2,	6,	0-5,	5,	0-2,	9	0-2,	5,	Objective	Level
Vinyl chloride	<6.1	<260 ⁽³⁾	<6.2	<6.5	<6.1	<6.0	<10	<5.3	×5.8	200	(3x1/8H)
Methylene chloride	<6.1	_c;09 <b>;&gt;</b>	<6.2	<6.5	<6.1	0.9>	<10	<5.3	\$ 50	150	93 000
Trichloroethene	5.6J	14,000	4.33	1.73	<6.1	6.2	210J	1.6.	< <b>5</b> × ×	880	000,000
Acetone	<6.1	<560UJ ^{.01}	<6.2UJ	5.4J	<i>&lt;7.4</i>	631	<14	4.61	1110 5/	200	04,000
1 2-Dichloroethene						2		3	0.00	200	0XIO
(total cis and trans)	<6.1	<560 ⁽³⁾	<6.2	<6.5	<6.1	0.9>	333	<5.3	<5.8	410	2.8x10°
Toluene	<6.1	095>	29>	1115 9>	<6.1	0 9/2	710	1116 3/	7.0	00.0	(10tal)
T.4111.			21.5	35.5	7.7	70.0	7.10		<.c>	7,100	$20x10^{\circ}$
Einyl benzene	<0.1	<>095>	<6.2	<6.5UJ	<6.1	0.9>	<10	<5.3UJ	<5.8	7 700	8x10 ⁶
Total xylenes	<6.1	095>	<6.2	<6.5UJ	<6.1	0.9>	<10	3.3.1	<5.8	1 680	2×108
								3	;	2,00	777

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - Soil Action Level (NYSDEC TAGM #3028, November 30, 1992). તું હ્યું
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective

	Well or B	orehole No	o., Soil Sam	ple Depth	in ft BGS,	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	ıtration (μg	/Kg)			
202	S37	S37	S37	838	S38	S39	S39	S40	S40	Cleanup	Action
										Objective	Level
	.8-9	10-12,	14-16'	.8-9	14-16'	0-5,	5,	0-2,	10,	(µg/Kg) ¹	(µg/Kg) ²
Vinyl chloride	<29	67>	<2.0cm	<5.9	0.9>	<5.9	<6.3	<5.7	9:9>	200	360
Methylene chloride	<29	<b>6</b> 7>	<5700)	<5.9	<6.0	<5.9	<6.3	<5.7	9.9>	150	93,000
Trichloroethene	026	08/	3,300	<5.9	6.1	1603	1.8J	2.33	9.9>	088	64,000
Acetone	<29	67>	< 270	<5.9	<6.0	<5.9UJ	<6.3UJ	<5.7UJ	<6.6UJ	200	$8x10^6$
1,2-Dichloroethene (total cis and trans)	250	300	450 <u>J</u>	<5.9	<6.0	102.5J	5.5J	1.93	9:9>	410	2.8x10 ⁶ (total)
Toluene	<29	<29	<570	<5.9	0.9>	<5.9UJ	<6.3	<5.7	9.9>	2,100	20x10°
Ethyl benzene	<29	<29	<570	<5.9	<6.0	<5.9UJ	<6.3	<5.7	9.9>	7,700	8x10 ⁶
Total xylenes	<29	<b>6</b> 7>	<570	<5.9	<6.0	4.6J	<6.3	<5.7	<6.6	1,680	$2x10^{8}$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

200 In

Indicates that concentration exceeds recommended soil cleanup objective

	Well or E	Sorehole No	Well or Borehole No., Soil Samy	ple Depth	in ft BGS,	ple Depth in ft BGS, and Concentration (ug/Kg)	ntration (us	y/Kg)			
202	S41	S41	S42	S42	S43	S43	S43	S44	S44	Cleanup	Action
	0-1,	.9	0-4,	.8-9	2-3,	10,	12,	1-2,	8-10,	Objective	Level
Vinyl chloride	<6.2	5.83	\ <u>\</u>	<580(2)	<6.0	<6.0	<5.6	0.9>	55.7 	200 200	(HB/NB)
Methylene chloride	<6.2	<6.2	<11	്ല085>	<6.0	<6.0	<5.6	<6.0	5.7	150	93 000
Trichloroethene	19	<6.2	57	1,500	6.9	16	20	0.9>	21	880	64 000
Acetone	833	11.5	8.93	~280 ₍₃₎	201	5.33	5.51	211	<5.7	200	04,000 8x10°
1,2-Dichloroethene	50.51	12	111	400T	0 0	111	10.4			207	2 8x10°
(total cis and trans)	3	77	61.1	3	0.0	4.1J	4.8J	0.0	5.13	410	(fotal)
Toluene	2.7J	<6.2	<11	<580	0.9>	<6.0	<5.6	<6.0	<5.7	2.100	20x 10 ⁶
Ethyl benzene	<6.2	<6.2	<11	<580	<6.0	0.9>	<5.6	0.9>	<5.7	7 700	8×10°
Total xylenes	1.2J	1.2J	<11	<580	6.2J	<6.0	<5.6	0.9>	<5.7	1.680	2x108
										2 6 -	

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
  - When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit. 4 6

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	Well or E	sorehole N	o., Soil S.	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	n ft BGS,	and Conce	ntration (µg	y/Kg)			
202	S44	S45	S45	S46	S46	S47	S47	S48	S48	Cleanup	Action
				·						Objective	Level
	12-14,	1-2,	5,	3-4'	5,	.8-9	14-16,	2-4,	10-12,	$(\mu g/Kg)^1$	$(\mu g/Kg)^2$
Vinyl chloride	<5.8	8.9>	0.9>	<610(3)	<6.1	<6.1	<5.7	<5.8	230	200	360
Methylene chloride	<5.8	8.9>	<6.0	< <b>010</b> 0	<6.1	<6.1	<5.7	<5.8	<30	150	93,000
Trichloroethene	18	8.9>	<6.0	<610	<6.1	<6.1	20J	<5.8	220	088	64,000
Acetone	7.7J	96>	26J	<610UJ ²⁾	201	<6.1	5.23	76J	<30	200	8x10 ⁶
1,2-Dichloroethene (total cis and trans)	3.0J	8.9>	<6.0	<610 ⁽³⁾	<6.1	<6.1	5.6J	8.1	1,100	410	2.8x10 ⁶ (total)
Toluene	8:5>	1.4J	<6.0	<610	<6.1	<6.1	<5.7	<5.8	<30	2,100	$20x10^{6}$
Ethyl benzene	<5.8	14)	<6.0	2500	<b>∠</b> 6.1	<6.1	<5.7	<5.8	<30	7,700	$8x10^6$
Total xylenes	<5.8	583	<6.0	10,000	1.8J	<6.1	<5.7	<5.8	<30	1,680	$2x10^{8}$
										Ì	

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective



	Well or E	Sorehole No	o., Soil Sam	ple Depi	th in ft]	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	centration (	ug/Kg)			
202	S48	S49	S49	S49	S50	SS0	S50	S51	S51	Cleanup	Action
	14-16'	6-8,	10-12,	14- 16'	2-4,	.8-9	14-16,	2-4'	10-12,	Objective (µg/Kg) ¹	Level (µg/Kg)²
Vinyl chloride	31	34	28	180	16J	<610 ⁽³⁾	(<009>	(<)009>	<640(3)	200	360
Methylene chloride	6.7>	<6.2	<22	<19	<22	<610 ⁽³⁾	<900ء	(c)009>	<640(3)	150	93.000
Trichloroethene	280	45	790	620	220	1,800	850	3.500	3.600	880	64.000
Acetone	18J	133	<22	24J	<22	<610UJ ⁽³⁾	<600UJ ⁽³⁾	<600UJ ⁽³⁾	<640UJ ⁽³⁾	200	8x10°
1,2-Dichloroethene (total cis and trans)	801	160	424	1,720	830	2,700	1,200	5,500	4,700	410	2.8x10°
Toluene	6.7>	<6.2	<22	<19	<22	<610	009>	009>	<640	2.100	20x10 ⁶
Ethyl benzene	6.7>	<6.2	<22	<19	<22	<610	009>	009>	<640	7,700	8x10°
Total xylenes	6.7>	<6.2	<22	<19	<22	<610	009>	009>	<640		2x10 ⁸

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
  - When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit. તં હ

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	or Borehol	Well or Borehole No., Soil Sam	mple Depth	in ft BGS,	, and Concer	ple Depth in ft BGS, and Concentration (μg/Kg)	Kg)			
COC S54	S54	S55	S55	958	S56	S56	S57	S57	Cleanup	Action
									Objective	Level
2-3	6,	2.5	.9	<b>&amp;</b>	12,	15,	2-4,	.8-9	(µg/Kg) ¹	$(\mu g/Kg)^2$
Vinyl chloride <10	<6.5	<6.1	<6.2	<13	<000 ₍₃₎	<590(3)	0.9>	14	200	360
Methylene chloride <10	<6.5	<6.1	<6.2	<13	<009ج	<290 ₍₃₎	0.9>	<7.0	150	93,000
Trichloroethene 3.1J	4.03	99	27	320	3,800	350J	<6.0	0.7>	088	64,000
Acetone <30	121	120J	4.83	9.61	$ <\!\! 600U1^{(3)}$	(<200D1 ₍₃₎	161	193	200	$8x10^{6}$
1,2-Dichloroethene (total <i>cis</i> and <i>trans</i> )	2.31	26	2.33	152.7J	1,700	2,300	0.9>	170J	410	2.8x10° (total)
Toluene <10	<6.5	3.23	<6.2	<13	009>	<590	<6.0	<7.0	2,100	$20x10^{6}$
Ethyl benzene 11J	2.73	8.0	<6.2	<13	910	5903	<6.0	<7.0	7,700	$8x10^{\circ}$
Total xylenes 5.2J	<6.5	16	<6.2	<13	540J	<590	0.9>	<7.0	1,680	$2x10^8$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	Well or B	orehole N	o., Soil San	nple Depth	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	and Conce	ntration (µg	y/Kg)			
coc	S57	858	858	829	829	S59	S59	S60	09S	Cleanup	Action
	14-16,	0-2,	, 9	0-5,	6,	8-9,	12,	2-4,	.8-9	Objective Objective	Level $(119/K_{\rm P})^2$
Vinyl chloride	62	9.9>	<6.1	<6.2	<5.9	<6.2	<5.6	0.9>	<5.8	200	360
Methylene chloride	<16	9.9>	<6.1	<6.2	<5.9	<6.2	<5.6	<6.0	<5.8	150	93.000
Trichloroethene	28	32J	54	17J	2.6J	22	1.93	<6.0	<5.8	880	64,000
Acetone	30J	7.03	6.91	<130	213	<6.2	11	353	<5.8		8x10°
1,2-Dichloroethene	640	74.83	57	5.03	3.43	6.2	4.33	<6.0	<5.8		2.8x10°
Toluene	<16	<6.6	<6.1	<6.2	<5.9	<6.2	<5.6	0.9>	<5.8	2.100	(total)
Ethyl benzene	<16	9.9>	<6.1	<6.2	<5.9	<6.2	<5.6	<6.0	<5.8		8x10°
Total xylenes	<16	9:9>	<6.1	<6.2	<5.9	9.1	<5.6	<6.0	<5.8		2x108

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
  - 2. Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
    3. When the sample quantitation limit is greater than the clean-up object
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

	Well or B	Well or Borehole No., Soil Samp	., Soil San	ple Depth	ple Depth in ft BGS, and Concentration (µg/Kg)	and Concer	ntration (με	y/Kg)		
202	S61	S61	Z9S	S62	S63	S63	S64	S64	Cleanup	Action
									Objective	Level
	2-4,	6-8,	1-2,	4-6,	1-2,	.8-9	1-2,	4-6,	(µg/Kg) ¹	$(\mu g/Kg)^2$
Vinyl chloride	<5.7	<5.7	9:5>	<5.9	0.9>	0.9>	<5.7	<5.8	200	360
Methylene chloride	<5.7	<5.7	<5.6	<5.9	0.9>	0.9>	<5.7	<5.8	150	93,000
Trichloroethene	<5.7	2.5J	<5.6	<5.9	<6.0	<6.0	<5.7	<5.8	880	64,000
Acetone	28J	9.01	111	<5.9	0.9>	<6.0	22J	<5.8	200	8x10°
1,2-Dichloroethene (total cis and trans)	<5.7	<5.7	<5.6	<5.9	<6.0	<6.0	<5.7	<5.8	410	2.8x10 ⁶ (total)
Toluene	<5.7	<5.7	<5.6	<5.9	<6.0	0.9>	<5.7	<5.8	2,100	$20x10^{6}$
Ethyl benzene	<5.7	<5.7	<5.6	<5.9	<6.0	<6.0	<5.7	<5.8	7,700	8x10°
Total xylenes	<5.7	<5.7	<5.6	<5.9	<6.0	<6.0	<5.7	<5.8	1,680	$2x10^{8}$

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
- Soil Action Level (NYSDEC TAGM #3028, November 30, 1992).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.

Indicates that concentration exceeds recommended soil cleanup objective



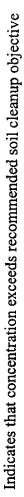
	Well or B	Well or Borehole No	:	ple Depth	in ft BGS, a	Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	ation (µg/	Xg)		
) ) )	9-MM	9-MM	MW-7b	MW-7b	S-S	S-18	S-18	S-19	S-19	Cleanup
	0-2,	10-12,	0-2,	16-18'	0-2,	0-2,	12-14'	2-4,	16-18,	Ubjective (µg/Kg) ¹
Acenaphthylene	<300	<300	<300	00£>	2,600	<3,000	<300	<300	009>	128,000
Anthracene	2,000	<300	<300	00£>	5,200J	33,000	<300	<300	2,300	980,000
Benzo(a)anthracene	006'9	<300	<300	<300	14,000J	22,000	<300	<300	009>	3,860
Benzo(a)pyrene	<1,500	<1,500	<1,500	<1,500	11,0001	<15,000	<1,500	<1,500	<3,000	15.400
Benzo(b)fluoranthene	<300	<300	<300	<300	14,0001	<3,000 ⁽²⁾	<300	<300	009>	1,500
Benzo(k)fluoranthene	<300	<300	<300	00€>	f00Z'9	<3,000 ⁽²⁾	<300	<300	009>	1,500
Chrysene	11,000	<300	<300	<300	14,0001	32,000	<300	<300	(z)009>	560
Fluoranthene	-	-	-	ı	27,000J	37,000	<300	<300	800	$2.66 \times 10^{6}$
Fluorene	720	<300	<300	<300	4,900J	5,100	<300	≪300	009>	511,000
Indeno(1,2,3- cd)pyrene	<1,500	<1,500	<1,500	<1,500	6,4003	<15,000 ⁽²⁾	<1,500	<1,500	<3,000	4,480
Naphthalene	340	<300	<300	<300	4,300J	3,900	<300	<300	009>	182.000
Phenanthrene	7,500	<300	<300	<300	28,000J	<3,000	300	<300	009>	305,000
Pyrene	17,000	<300	<300	<300	23,000J	35,000	300	<300	750	930,000
Note										

### Note:

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit. ri

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



	Well or Bo	orehole	Well or Borehole No., Soil Sample Depth in ft BGS, and Concentration (µg/Kg)	aple Depth	in ft BGS,	and Concer	ıtration (μg	/Kg)	
202	S-33	S-33	S-34	S-34	S-35	S-35	9E-S	S-36	Cleanup
									Objective
	0-2,	6,	0-2,	5,	0-2,	,9	0-2,	5,	(µg/Kg) ¹
Acenaphthylene	1,200J	24J	<14,000U J	<390UJ	<410UJ	<410UJ	7703	<370UJ	128,000
Anthracene	17,000J	160J	12,000J	<390UJ	<410UJ	<410UJ	17,000J	<370UJ	980,000
Benzo(a)anthracene	36,000	420	26,000	<390	<410	<410	35,000	42J	3,860
Benzo(a)pyrene	31,000J	450J	26,000J	<390UJ	<410UJ	<410UJ	41,000J	57J	15,400
Benzo(b/k)fluoranthene	47,000	730	35,000	<390	<410	<410	23,000	75J	1,500
Chrysene	36,000J	460J	27,000J	<390UJ	<410UJ	<410UJ	36,000J	47.1	560
Fluoranthene	81,000	9801	51,000J	<390UJ	<410UJ	<410UJ	66,0001	85J	$2.66 \times 10^{0}$
Fluorene	7,400J	73J	3,500J	<390UJ	<410UJ	<410UJ	7,0001	<370UJ	511,000
Indeno(1,2,3-cd)pyrene	22,000	3901	18,000	<390	<410	<410	29,000	36J	4,480
Naphthalene	6,500J	581	2,100J	<390UJ	<410UJ	<410UJ	12,000J	<370UJ	182,000
Phenanthrene	55,000J	6401	38,000J	<390UJ	<410UJ	<410UJ	49,000J	61J	305,000
Pyrene	83,000J	9601	58,000J	<390UJ	<410UJ	<410UJ	76,000J	82J	930,000

### Note

- Recommended Soil Cleanup Objectives calculated based on 1.4% TOC in soil (NYSDEC TAGM HWR-94-4046, January 24, 1994).
- When the sample quantitation limit is greater than the clean-up objective, the assumed COC concentration is half of the quantitation limit.

J indicates estimated value.

UJ indicates that the analyte was not detected above the sample quantitation limit and the reported quantitation limit is an estimated quantity.



Indicates that concentration exceeds recommended soil cleanup objective

### APPENDIX B Summary of Groundwater Sampling

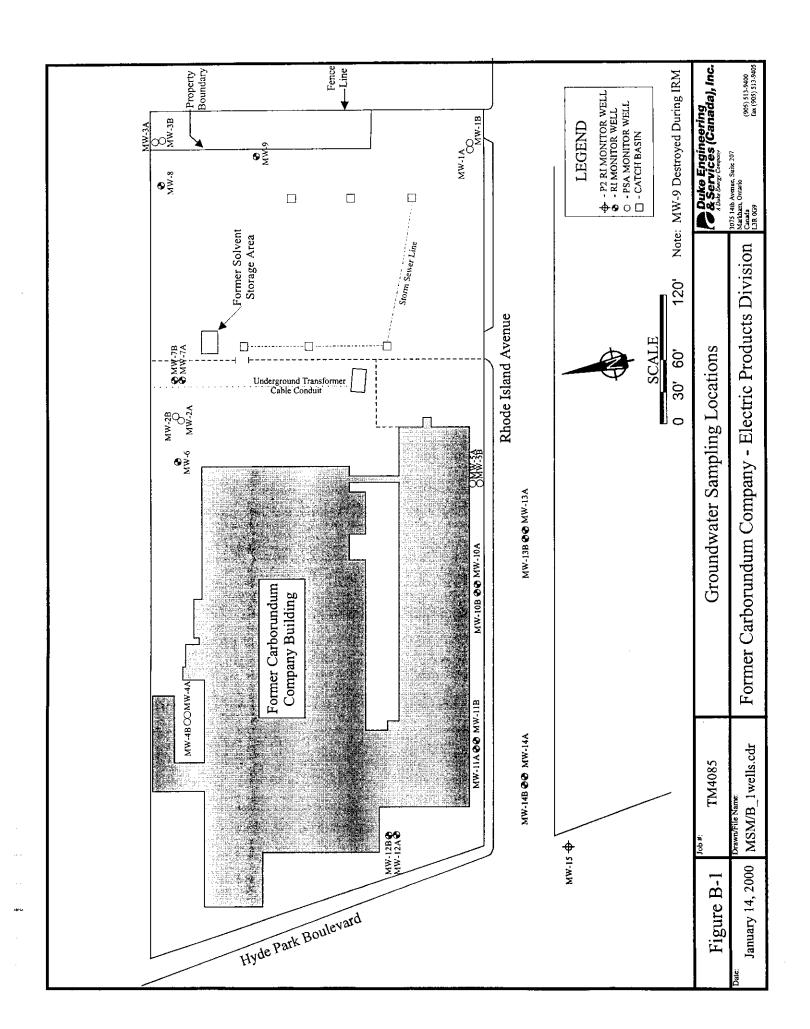


Table B-1 Groundwater Analytical Results

				Well ID,		Sample Date and Concentration (µg/L)	nd Conce	ntration	(µg/L)				Wa	Water
Contaminant Of	MW	MW-1A	MW	MW-1B	MV	MW-2A	MW	MW-2B	MW	MW-3A	MW	MW-3B	Stan	Standard
Concern	8/92	11/97	8/92	11/97	8/92	11/97	8/92	11/97	8/92	11/97	8/92	11/97	8H)	(48/17)
Vinyl chloride	23	7	<10	\$	<10	<2J	99	. 29.T	<10	77	5	<2J	2	i
cis- and frans-1 2-												ì		
dichloroethene		\$		\$	<10	\$	2300	4501	<10	\$	18	5.1		ν.
Trichloroethene	<10	<5	<10	\$	<10	<5J	670	<b>P9</b>	4.5	\$	<10	155		v
Benzene	<10	<0.7	<10	<0.7	<10	<0.7J	15	<0.7J	<10	\\$	0.6J	251	0.7	
1,1-dichloroethane	2.3	\$	33	\$	33	12.1	<10	<5J	<10	<0.7	<10	<0.7J		w

Note: 1. NYSDEC (1991) (6NYCRR Part 703) 2. NYSDEC (1991) (TOGS 1.1.1)

well located on upgradient boundary

J indicates estimated value

1200 indicates that concentration exceeds water quality standard

Wells MW-6, 7A, 7B, 8, 9, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, 14A, and 14B sampled May 1996 during the Remedial Wells MW-1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, and 5B sampled August 1992 during the Preliminary Site Assessment Investigation

All wells sampled November.1997 during the Phase II Remedial Investigation

Table B-1 Groundwater Analytical Results (continued)

	Well ID	, Sample	Date and	Concent	Well ID, Sample Date and Concentration (μg/L)	g/L)		1					Water Quality	ter lity
Contaminant Of	MW	MW-4A	MW-4B	-4B	MW-5A	-5A	MW-5B	'-5B	*9-MW	/-6*	MW-7A*	-7A*	Standard (μg/L)	lard (L)
Concern	8/92	11/97	8/92	11/97	8/92	11/97	8/92	11/97	96/5	11/97	96/5	11/97	1.	2.
Vinyl chloride	13	32J	26	22	1300	14	75	331	<100	f89	<1000	113	2	
cis- and trans-1,2-	230	493	130	45	0061	110	520	270	1000	£95J	1200	5206J		ĸ
Trichloroethene	3J	<5J	5.1	\$	<200	\$		53	<100	<5J	8700	14007		S.
Benzene	<10	<5J	<10	<0.7	<200	<0.7	<10	<0.7J	<100	<0.7J	<1000	41	0.7	
1,1-dichloroethane	2J	<0.7J	<10	2J	<200	<5	33	f\$>	<100	<5J	<100	15007		S

Note: 1. NYSDEC (1991) (6NYCRR Part 703) 2. NYSDEC (1991) (TOGS 1.1.1)

well located on upgradient boundary

J indicates estimated value

1200 indicates that concentration exceeds water quality standard

Wells MW-6, 7A, 7B, 8, 9, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, 14A, and 14B sampled May 1996 during the Remedial Wells MW-1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, and 5B sampled August 1992 during the Preliminary Site Assessment Investigation

All wells sampled November 1997 during the Phase II Remedial Investigation

Table B-1 Groundwater Analytical Results (continued)

				Well ID,		le Date aı	ıd Conce	Sample Date and Concentration (µg/L)	(μg/L)				Water	ter
Contaminant Of	MW	MW-7B*	MV	MW-8*	W	MW-9	MW	MW-10A	MW	MW-10B	MW	MW-11A	Standard (µg/L)	lard (T.)
Concern	2/96	11/97	96/5	11/97	96/9	11/97	96/5	11/97	96/5	11/97	96/5	11/97	1	7.
vinyl chloride	<100	235	<10	<2J	<10	41	38.1	9	120J	52	<10	77	2	
cis- and trans-1,2-dichloroethene	370	8	<10	3		19	069	1212	006	921	<10	δ.		S.
Trichloroethene	<100	<5J	<10	<5J	<10	<5J	<250	\$>	503	28	<10	\$		r.
Benzene	<100	<0.7J	<10	<0.7J	<10	<0.7J	<250	<0.7	<250	<0.7	<10	<0.7	0.7	
1,1-dichloroethane	<100	<5J	<10	<5.5	<10	<5J	<250	18	<250	<5	<10	\$		S.

Note: 1. NYSDEC (1991) (6NYCRR Part 703)

2. NYSDEC (1991) (TOGS 1.1.1)

well located on upgradient boundary

J indicates estimated value

1200 indicates that concentration exceeds water quality standard

Wells MW-6, 7A, 7B, 8, 9, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, 14A, and 14B sampled May 1996 during the Remedial Wells MW-1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, and 5B sampled August 1992 during the Preliminary Site Assessment Investigation

All wells sampled November 1997 during the Phase II Remedial Investigation

Table B-1 Groundwater Analytical Results (continued)

:				Well ID,		Sample Date and Concentration (µg/L)	d Conce	ntration	(µg/L)				Water Quality	ter lity
Contaminant Of	MW	MW-11B	MW-12A	-12A	MW-12B	.12B	MW-13A	-13A	MW	MW-13B	MW-14A	.14A	Standard (µg/L)	lard L)
Concern	96/9	11/97	96/9	11/97	96/2	11/97	96/5	5/96 11/97	96/5		96/5	11/97	1.	2.
vinyl chloride	<50	95	13.1	[4]	16J	53J	<10	<2.J	<100	31J	<10	<2.5	2	
cis- and trans-1,2-	390	70SJ	430	DZ1	250	2503	<10	<5J	810	4100	<10	<51		w
Trichloroethene	<\$0	<5	<50	<5J	181	<5J	<10	<5J	48J	36	<10	<5J		S
Benzene	<50	<0.7	<50	<0.7J	<50	<0.7J	<10	<0.7J	<100	<1J	<10	<0.7J	0.7	
1,1-dichloroethane	<50	\$>	<20	<\$1	<50	<5J	<10	<5J	<100	<10J	<10	<5J	•	ις.

Note: 1. NYSDEC (1991) (6NYCRR Part 703) 2. NYSDEC (1991) (TOGS 1.1.1)

well located on upgradient boundary

J indicates estimated value

1200 mindicates that concentration exceeds water quality standard

Wells MW-6, 7A, 7B, 8, 9, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, 14A, and 14B sampled May 1996 during the Remedial Wells MW-1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, and 5B sampled August 1992 during the Preliminary Site Assessment Investigation

All wells sampled November 1997 during the Phase II Remedial Investigation

Table B-1 Groundwater Analytical Results (continued)

	Wel	Well ID, Sample Date and Concentration (μg/L)	nple Date tion (µg/	e and L)	ĭă ∧ïo	Water Quality
Contaminant	MW	MW-14B	M	MW-15	Stan (μg	Standard (μg/L)
Concern	96/9	11/97	96/9	11/97	1.	2.
Vinyl chloride	0\$>	159	n/a	- 68:	2	
cis- and trans-1,2-	310	1372	,,	10.74		
dichloroethene			11/4			n
Trichloroethene	<50	<5J	n/a	<10		5
benzene	<50	<0.73	n/a	\	0.7	
1,1-dichloroethane	<50	<5J	n/a	<10		N.

Note: 1. NYSDEC (1991) (6NYCRR Part 703) 2. NYSDEC (1991) (TOGS 1.1.1)

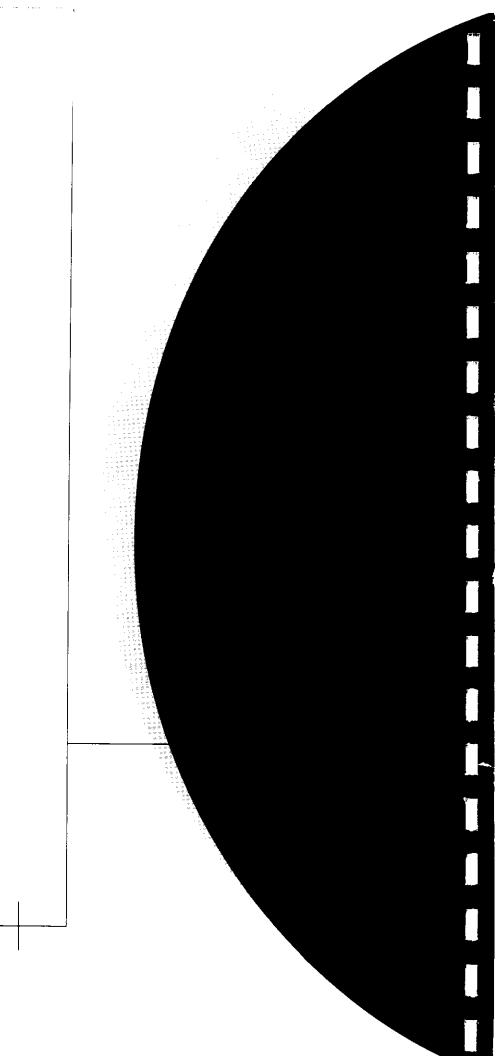
well located on upgradient boundary

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Wells MW-6, 7A, 7B, 8, 9, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, 14A, and 14B sampled May 1996 during the Remedial Wells MW-1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, and 5B sampled August 1992 during the Preliminary Site Assessment Investigation. All wells sampled November 1997 during the Phase II Remedial Investigation.

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A Duke Energy Company

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### Feasibility Study for the Remediation of the Former Carborundum Company -Electric Products Division, Hyde Park Facility Town of Niagara, Niagara County, New York SITE NO. 932036

### FINAL DOCUMENT

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