Schreck's Scrapyard
55 Schenck Street
N. TONAWANDA, NEW YORK

Site Management Plan

NYSDEC Site Number: 932099

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Revisions to Final Approved Site Management Plan:

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SITE MANAGEMENT PLAN

1.0 INTRODUCTION

This document is required as an element of the remedial program at Schreck's Scrapyard (hereinafter referred to as the "Site") under the New York State (NYS) Inactive Hazardous Waste Disposal Site Remedial Program administered by New York State Department of Environmental Conservation (NYSDEC). The site was remediated by Occidental Chemical Corporation (Occidental) which entered into an Order on Consent with the NYSDEC on January 16, 1991 to conduct the Removal Action predicated on previous site investigations. The remedial action was performed in accordance with the requirements of the Work Plan entitled "Industrial Waste and Soil Removal Action at Schreck's Scrapyard North Tonawanda, New York" dated, November, 1990.

1.1 General

Occidental entered into an Order on Consent with the NYSDEC to remediate a 1.5 acre property located in City of North Tonawanda, New York. This Order on Consent, required the Remedial Party, Occidental, to remediate contaminated media at the site. A figure showing the site location and boundaries of this 1.5 acre site is provided in Figure 1. The boundaries of the site are more fully described in the metes and bounds site description that is part of the Deed Restriction.

After completion of the remedial work described in the Remedial Action Work Plan, some contamination was left in the subsurface at this site, which is hereafter referred to as 'remaining contamination." This Site Management Plan (SMP) was prepared to manage remaining contamination at the site until the Deed Restriction is extinguished in accordance with ECL Article 71, Title 36. All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State.

This SMP was prepared by NYSDEC – Region 9 Office in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation and the guidelines provided by NYSDEC. This SMP addresses the means for implementing the Institutional Controls (ICs) that are required by the Deed Restriction for the site.

1.2 Purpose

The site contains residual contamination left in place after completion of the remedial action. Institutional Controls have been incorporated into the site remedy to control exposure to remaining contamination during the use of the site to ensure protection of public health and the environment. A Deed Restriction granted to the NYSDEC, and recorded with the Niagara County Clerk, will require compliance with this SMP and all applicable ICs placed on the site. The ICs place restrictions on site use, and mandate operation, maintenance, monitoring and reporting measures for ICs. This SMP specifies the methods necessary ensure compliance with ICs required by the Deed Restriction for contamination that remains at the site. This plan has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Deed Restriction and the grantor's successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

This SMP provides a detailed description of all procedures required to manage remaining contamination at the site after completion of the Remedial Action, including:

(1) implementation and management of all Institutional Controls; and (2) performance of periodic inspections, certification of results, and submittal of Periodic Review Reports.

To address these needs, this SMP includes an Institutional Control Plan for implementation and management of the ICs.

As this plan only includes an IC, Periodic Review Reports for the periodic submittal of data, information, recommendations, and certifications to NYSDEC as required is not required as of this writing.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Deed Restriction. Failure to properly implement the SMP is a violation of the Deed Restriction, which is grounds for revocation of the Certificate of Completion (COC);

- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 and the Order on Consent for the site, and thereby subject to applicable penalties.

1.3 Revisions

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. In accordance with the Environmental Easement for the site, the NYSDEC will provide a notice of any approved changes to the SMP, and append these notices to the SMP that is retained in its files.

2.0 SITE BACKGROUND

2.1 Site Location and Description

The Schreck's Scrapyard Site consists of a single parcel at 55 Schenck Street in the City of North Tonawanda, Niagara County, New York (Figures 2-1 and 2-2) identified as SBL 160.18-1-80.2, 160.18-1-81, 160.18-1-82, and 160.18-1-83.1on the North Tonawanda Tax Map.. The site occupies an area of approximately 1.5 acres in a mixed light industrial, commercial and residential neighborhood. The site is bounded on the north by Schenck Street and the Smurfit Stone box making facility, on the east by railroad tracks and an empty lot, on the south by a warehouse owned by Idek, LLC, and on the west by a warehouse utilized by Smurfit Stone (Figure 2). Although no residential properties are adjacent to the site, a dense residential neighborhood lies approximately one block to the east.

Prior to remediation, the site contained four significant structures; a cinder block office building, a garage, the frame of an abandoned bailer machine with a concrete foundation, and an abandoned press pit (Figure 2-2). The site's soil was oily and essentially void of vegetation.

Miscellaneous scrap was found throughout the site. The surface topography of the site is relatively flat, with an elevation of approximately 573 feet above mean sea level (amsl). The surface of the Schreck's Scrapyard Site is now covered with clean soil utilized as backfill during the remediation of the site. The boundaries of the site are more fully described in Appendix B – Deed Restriction.

2.2 Site History

Schreck's Iron and Metal Company operated a scrap iron business at this site from 1951 to 1953. Site operations prior to this time are unknown. In 1953, the business was sold to Bengart and Menel, Inc., who reportedly continued the same operation until 1977. From 1951 until 1975, drums of phenolic waste from Occidental-Durez were reportedly brought to the site and subsequently hauled by the facility's trucks to local waste disposal facilities. In 1965, 50 to 60 drums of phenolic wastes were reportedly landfilled in the abandoned press pit. The pit was approximately 18 to 20 feet deep and

also contained building debris. Following the placement of the drums, the pit was reportedly covered with approximately two feet of soil.

From 1960 to 1975, transformers from Niagara Mohawk Power Corporation were routinely brought to the site for salvage. The metal exterior was sheared and the oil was allowed to spill onto the ground surface. It has been reported that the oil-soaked soils were periodically pushed by a bulldozer toward the eastern boundary of the property.

Previous Investigations:

In 1983, the Lawless Container Corporation retained RECRA Research, Inc. (RECRA) to conduct a pre-purchase environmental audit of the former Schreck's Scrapyard property. Analyses from two composite soil samples revealed the presence of polychlorinated biphenyl (PCB) at concentrations of 18 and 66 parts per million (ppm), respectively, elevated concentrations of heavy metals, and the presence of cyanide, phenols and volatile organic compounds (VOCs). Based upon the results of this audit Lawless did not purchase the property.

In 1986, the NYSDEC retained RECRA to complete a Phase I Investigation of the site. The analyses from the Lawless environmental audit were used in this report. Due to the presence of PCBs in site soil at concentrations greater than 50 ppm, the Schreck's Scrapyard Site was listed as a Class 2 inactive hazardous waste site in the Registry of Inactive Hazardous Waste Disposal Sites in New York State (Registry). In 1989, the NYSDEC retained Eder Associates Consulting Engineers, P.C. (Eder Associates) to conduct a Remedial Investigation of the site. This investigation, completed in 1990, delineated the extent of PCB contaminated soils, identified the presence of deteriorated drums in the abandoned press pit, and determined the extent of groundwater contamination resulting from the buried drums and contaminated soils. Utilizing the results from the RI, Eder Associates completed a Feasibility Study (FS) for the site in August 1990. In September 1990 the NYSDEC issued a Record of Decision for the Schreck's Scrapyard Site. The elements of the selected remedy are summarized as follows:

- the excavation, treatment and off-site disposal of contaminated soils;

- the decontamination of on-site buildings and a portion of Schenk Street;
- the removal of buried drums from the abandoned press pit and any soils contaminated by the drummed waste; and
- the backfilling of all excavated areas to grade with clean soils.

Upon the satisfactory completion of the remedial activities the site was reclassified to a Class 4 site on November 9, 1994.

2.3 Geologic and Hydrogeologic Conditions

Geology:

The bedrock formation first encountered underlying the site, is the Camillus Shale of Silurian age. This unit is described as a gray, red and green thin-bedded shale. Limestone and dolomite interbed with the shale and beds and lenses of gypsum up to five feet thick are found in the unit. The Camillus Shale is estimated to be about 400 feet thick and dips southward at approximately 40 feet per mile. Unconsolidated materials are found above the bedrock, which in this area are of glacial origin and consist primarily of lacustrine clays with stringers of sand and silt. The U.S. Geological Survey drilled a test boring approximately three miles northeast of the site in 1982. Unconsolidated deposits consisted mostly of pink to gray-green clay with some sandy pink clay. Bedrock at the U.S. Geological survey boring was encountered at 27 feet below ground surface. The remedial investigation also drilled a test boring to bedrock. The bedrock at the site was encountered at a depth of 40.5 feet below ground surface.

Hydrogeology:

The hydrogeologic system in areas near the site consist of a bedrock aquifer in the Camillus Shale overlain by an aquifer in the unconsolidated deposits. Where gypsum has been dissolved in the Camillus Shale, openings exist for the passage and storage of water. Water within the bedrock flows through solution zones, joints, and fractures. The Camillus Shale is estimated to have a transmissivity ranging from 7000 to 70,000 gallons per day per foot. Groundwater in the shallow bedrock discharges to Tonawanda Creek, Ellicott Creek and the Niagara River. The low permeability of the glacial lacustrine deposits results in a seasonal high water table following wet periods. This perched water table discharges into areas of low topography and eventually into nearby surface water bodies.

A geologic section is shown in Figures 7 through 12

A groundwater flow figure is shown in Figure 6-1

3.0 SUMMARY OF SITE INVESTIGATION FINDINGS

3.1 Investigation Reports

Four investigations have been undertaken to identify environmental conditions at the Site. The first investigation was undertaken in 1983 when Lawless Container Corporation retained Recra Research, Inc. (Recra) to conduct a pre-purchase environmental assessment of the property. Analysis of two composite soil samples from outside the Pit revealed the presence of PCBs (18 and 66 mg/kg), elevated levels of metals, and the presence of cyanide, phenolics and volatile organic compounds.

In 1986, Recra was retained by the NYSDEC to conduct a Phase I Investigation, the purpose of which was to collect available information and score the Site, using standard ranking models, to determine if the Site was eligible for the State and/or Federal priority list of uncontrolled hazardous material sites. The Site is currently ranked as a Class 2 Site on the NYSDEC Registry of Inactive Hazardous Waste Disposal Sites.

In 1988, Eder Associates was retained by the NYSDEC to conduct a Remedial Investigation/ Feasibility Study (RI/FS) at the Schreck's Scrapyard Site. The RI/FS analytical results indicated that the Site is contaminated with PCBs, as well as some organic compounds and metals. In 1989, DUNN was retained by Whiteman Osterman & Hanna to sample three of the drums and the soil in the Pit. The analytical results from these samples have been shared with the NYSDEC and were included in the Work Plan and herein, as Appendix A. The analysis of samples from within the Pit also revealed the presence of PCBs at levels less than 50 ppm. The presence of waste in the Pit prompted the development of an Order on Consent and a Work Plan for the removal of industrial waste and contaminated material in the Pit and the performance of the pit hydraulic integrity tests. The Work Plan, formally approved by the NYSDEC, served as the basis of the waste removal effort; defined sampling and analytical protocols; outlined waste material excavation, storage and transportation requirements; and provided a health and safety plan.

3.2 Summary of Remedial Actions

The site was remediated in accordance with the NYSDEC-approved Remedial Action Work Plan, dated November 1990.

The following is a summary of the Remedial Actions performed at the site:

3.2.1 Abandoned Press Pit - Occidental Remediation

In 1991, under an Order on Consent with the NYSDEC, Occidental completed the remediation of the abandoned press pit by removing 160 drums of phenolic resin wastes, 23 truck-loads of contaminated soil and debris (totaling approximately 380 tons), and 10,950 gallons of contaminated liquids. All liquid wastes were transported to DuPont's Deepwater, New Jersey permitted facility for treatment, while all solid wastes were transported to the United States Pollution Control Lone Mountain permitted facility in Oklahoma for disposal.

Following the excavation and removal of drums, soil, debris and liquids from the pit, the inside of the pit was cleaned by first scraping chemical tar and caked oil residues off the floor and walls with flat shovels, then sandblasting the entire pit to remove all visible contamination. Sandblasted material, including the sand, was loaded into a roll-off for disposal with the other solid waste. The final step in the cleaning operation was the washing of the pit with water from a high pressure hose. Wipe samples of the concrete walls and floor were not collected following this work. Once the abandoned press pit was clean, a wooden roof was constructed over the pit to prevent the pit from filling with rain water.

3.2.2 NYSDEC Remediation:

In 2000, as part of the ongoing Operation and Maintenance Program at the site, the wooden roof covering the press pit, which had deteriorated since 1991, was removed by the NYSDEC Division of Operations. Following the removal of the roof, approximately twelve feet of water was pumped from the pit. At the bottom of the pit, oily debris was encountered. At this point, it was decided that the Division of Operations could not continue its work until the oily debris had been investigated and removed by a qualified waste contractor. As a result, Op-Tech Environmental Services, Inc. (Op-Tech), a NYSDEC Spill Response Contractor, was hired to remove and dispose of the petroleum contaminated pit debris.

Op-Tech began work on August 2, 2000 and had filled three roll-offs with debris by the end of the day. Once the debris was removed, an oily liquid was observed seeping

through a crack in the concrete floor. A 5' x 5' area of the concrete floor was broken open to observe the soils underneath the floor. Oily liquid was observed. A sample of this oil was collected for chemical analysis and found to contain #2 fuel oil at 66,494 ppm, lube oil at 312,418 ppm and PCBs at 24.8 ppm. The remaining concrete floor was broken into pieces to facilitate the removal of contaminated soil beneath the floor.

Once the concrete floor was breached, a chemical odor similar to that observed at the former Occidental-Durez Plant in North Tonawanda was detected. Due to these odors, Glenn Springs Holdings, Inc. (a subsidiary of Occidental that is responsible for the company's site remediation projects) was contacted. On August 4, 2000, Glenn Springs agreed to transport soils potentially contaminated with Occidental-Durez waste from the pit to the former Durez Plant for staging, testing and appropriate off-site disposal.

Excavation of the abandoned press pit was completed by Op-Tech on August 9, 2000. Following the collection of confirmatory soil samples (see Section 3.1.3), the excavation was backfilled with clean soil to within four feet of finished grade. At this stage of the project, the NYSDEC Division of Operations returned to the site and backfilled the remaining excavation with clean soil, and graded, seeded and mulched the areas adjacent to and north of the press pit. This work was completed on November 3, 2000.

An estimated 135 cubic yards of Occidental-Durez contaminated soils were ultimately transported by Occidental to the CWM Chemical Services permitted facility in Model City, New York for disposal, while approximately 125 cubic yards of petroleum contaminated soils were transported by Op-Tech to the CID permitted landfill in Chaffee, New York for disposal.

Following the completion of excavation activities by Op-Tech, six confirmatory soil samples were collected from the floor and sidewalls of the excavation. The wall samples were collected from soils beneath the footer of each wall, while the floor samples were collected from the east and west sections of the excavation. Several VOCs, SVOCs and pesticides were detected in the samples however none of the contaminants were detected at concentrations that exceeded the Part 375 residential or TAGM 4046 soil cleanup objectives.

3.2.3 Building Demolition

Prior to building demolition, an asbestos survey was conducted that identified non-friable asbestos in the office building. Asbestos abatement of this building began on September 23, 1993 and was completed on September 25, 1993. Approximately 5.31 tons of asbestos containing materials were transported to the CID permitted landfill in Chaffee, New York for disposal. Once the asbestos was removed from the office building, demolition and removal of PCB contaminated materials from the garage and office building took place. The footings and foundations of the garage remain on site (Figure 2-2). Approximately 145.6 tons of construction and demolition debris were transported to the CID permitted landfill in Chaffee, New York for disposal.

3.2.4 Soil Removal Activities:

The excavation of contaminated soils from the Schreck's Scrapyard Site began in August 1993 and was completed in January 1994. Due to limited space, access roads were constructed as the excavation progressed to maneuver trucks around the site. All access roads terminated at the decon pad. Soil excavation began along the eastern portion of the site and continued in a clockwise direction. The site was remediated in sections (cells), with the depth of excavation in each cell established during the remedial design phase of the project. When the soil in a given cell was excavated to the design depth, confirmatory soil samples were collected and analyzed to determine if remediation in that cell was complete. In areas where soils at the design depth were still contaminated, the soil was excavated an additional foot and re-sampled. This procedure continued until the PCB concentrations achieved the 10 ppm cleanup goal for the site. Final excavation depths ranged from 1 to 9 feet and a total of 16,329 tons of contaminated soil and debris was excavated from the site. This total includes 5,530 tons of hazardous soil and debris (PCB concentrations >50 ppm), 91 tons of RCRA-hazardous soil and debris (TCLP failures for metals), and 10,708 tons of contaminated non-hazardous soil and debris. In addition, approximately 685 cubic yards of non-hazardous soil was removed from the Conrail property adjacent to the eastern boundary of the site. Excavation in this area was to 2 feet depth. The hazardous soils were transported to the CWM Chemical Services permitted facility in Model City, New York for disposal, while the non-hazardous soils

were transported to either the High Acres Landfill in Ohio or the Lakeview Landfill in Erie, Pennsylvania for disposal.

Following the completion of excavation activities and the partial backfilling of the site, activities were suspended from February 23, 1994 thru June 1, 1994. Final backfilling and grading operations resumed after this shutdown period and were completed by August 1994. The Construction Certification Report does not indicate if the soils utilized for backfill were tested prior to use, nor are any analytical results contained in the report if such testing was completed.

During the remediation of the Schreck's Scrapyard Site, a total of 165 confirmatory soil samples from 60 cells were collected and analyzed for PCBs using both immunoassay field kits (144 samples) and laboratory analysis (21 samples). The immunoassay field kits were calibrated to provide a positive result for PCB concentrations greater than 10 ppm. These results indicate that all samples achieved the 10 ppm PCB cleanup goal for the site. These results also indicate, however, that the concentration of PCBs in five samples exceeded the Part 375 residential and commercial soil cleanup objective for PCBs. Specific details of the remedial action can be found in the Construction completion report entitled: INDUSTRIAL WASTE AND SOIL REMOVAL ACTION FINAL REPORT, SCHRECK SCRAPYARD, dated June 1991.

No long-term treatment systems were installed as part of the site remedy.

Results of all soil samples remaining at the site after completion of Remedial Action are provided in the report entitled: INDUSTRIAL WASTE AND SOIL REMOVAL ACTION FINAL REPORT, SCHRECK'S SCRAPYARD, North Tonawanda, New York, Prepared for: OCCIDENTAL CHEMICAL CORPORATION, Niagara Falls, New York, Prepared by: DUNN GEOSCIENCE CORPORATION, Amherst, New York, Dated:, June2, 1991, Appendix C.

4.0 INSTITUTIONAL CONTROL PLAN

Since contaminated soil and groundwater exist beneath the site, Institutional Controls (ICs) are required to protect human health and the environment.

4.1 Institutional Controls

A series of Institutional Controls is required by the NYSDEC to: (1) prevent future exposure to contaminated media by controlling disturbances of the residual subsurface contamination; and, (2) limit the use and development of the site to Commercial or Industrial uses only. Adherence to these Institutional Controls on the site is required by the Deed Restriction and will be implemented under this Site Management Plan.

These Institutional Controls are:

1. Compliance with the Deed Restriction and this SMP by the Grantor and the Grantor's successors and assigns;
2. The Site owner or a qualified environmental professional will certify each IC in a manner defined in Section 4.3 of this SMP;
3. The property may only be used for Commercial or Industrial use provided that the long-term Institutional Controls included in this SMP are employed;
4. The property may not be used for a higher level of use, such as Unrestricted or Restricted Residential use, without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
5. Institutional Controls identified in the Deed Restriction may not be discontinued without an amendment to or extinguishment of the Deed Restriction.
6. All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP;
7. The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
8. NYSDEC retains the right to access the Site at any time in order to evaluate the continued maintenance of the soil cover;

9. Excavation Work Plan (EWP): Any future intrusive work that will penetrate the soil cover or encounter or disturb the contaminated media, including any modifications or repairs to the existing soil cover will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix A to this SMP.

4.2 Excavation Work Plan

The Shreck Scrapyard site was remediated for restricted commercial/industrial use. Any future intrusive work that may encounter or disturb the remaining contamination will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix A to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) Appendix D prepared for the site. A sample HASP is attached as Appendix E to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section A-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

The site owner and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of all intrusive work, the structural integrity of excavations, proper disposal of excavation de-water, control of runoff from open excavations into remaining contamination, and for structures that may be affected by excavations (such as building foundations and bridge footings). The site owner will ensure that site development activities will not interfere with, or otherwise impair or compromise, the engineering controls described in this SMP.

4.3 Notifications

Notifications will be submitted by the property owner to the NYSDEC for the following reasons:

- Written 60-day advance notice of any proposed changes in site use that are required under the terms of the Deed Restriction, 6NYCRR Part 375, and/or Environmental Conservation Law.
- Written 7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan (EWP).

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of all approved work plans and reports, including this SMP
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing.

4.4 Certification of Institutional Controls

On an annual basis, or as otherwise directed by the NYSDEC, the Site owner or a qualified environmental professional will prepare and sign the following certification:

For each institutional control identified for the site, I certify that all of the following statements are true:

- The institutional control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- Use of the site is compliant with the deed restriction;
- The information presented in this report is accurate and complete.

- I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as *[Owner or Owner's Designated Site Representative]* for the site.

The signed certification will be included in the Periodic Review Report described below.

4.5 Periodic Review Report

A Periodic Review Report (PRR) will be submitted to the Department periodically as directed by the Department. The first PRR will be submitted beginning fifteen months after the effective date of the site delisting. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site as described in the Deed Restriction (Metes and Bounds). The report will be prepared in accordance with NYSDEC DER-10 and submitted within 30 days of the end of each certification period. Media sampling results will also incorporated into the Periodic Review Report. The report will include:

- Identification, assessment and certification of all ICs required for the site;
- Results of the any periodic site inspections and severe condition inspections, if applicable;

The Periodic Review Report will be submitted, in electronic format, to the NYSDEC Regional Office in which the site is located, the NYSDEC Central Office, and to the NYSDOH Bureau of Environmental Exposure Investigation.

4.6 Contingency Plan

Emergencies may include injury to personnel, fire or explosion, environmental release, or serious weather conditions. Buried drums and underground storage tanks at the subject site have not been identified nor are expected to be present. If drums or tanks are found, excavation activities must cease and the site owner and/or remedial party, and NYSDEC will be notified within two hours of discovery. The drums and tanks shall be

handled, removed and cleaned by appropriately trained personnel in accordance with all applicable federal, state and local regulations. Soils surrounding the tanks and drums shall be assessed for impacts in accordance with applicable guidance documents (i.e., PBS regulations, DER-10, etc.).

In the event of any environmentally related situation or unplanned occurrence requiring assistance the Owner or Owner's representative(s) should contact the appropriate party from the contact list below. For emergencies, appropriate emergency response personnel should be contacted. These emergency contact lists must be maintained in an easily accessible location at the site.

Table 3: Contact Numbers

Medical, Fire, and Police:	911
One Call Center:	(800) 272-4480 (3 day notice required for utility markout)
Poison Control Center:	(800) 222-1222
Pollution Toxic Chemical Oil Spills:	(800) 424-8802
NYSDEC Spills Hotline	(800) 457-7362
DAVE HROMOWYK - Rocktenn	(716) 628-5799

TABLES

Table 3-2.
Analytical Results of Confirmatory Samples Collected During the Press Pit Remediation at the Schreck's Scrapyard Site.

Sample Number Date Sampled Sample Depth Sample Location	Part 375 Residential Soil Cleanup Objective *	Part 375 Commercial Soil Cleanup Objective *	S-1 08/07/00 ± 15.0 North Wall	S-2 08/07/00 ± 15.0 East Wall	S-3 08/07/00 ± 15.0 South Wall	S-4 08/07/00 ± 15.0 West Wall	S-5 08/07/00 ± 15.0 East Floor	S-6 08/07/00 ± 15.0 West Floor
Volatile Organic Compounds (µg/kg or ppb)								
Acetone	100,000	500,000	71.0	140.0	64.0	44.0	90.0	24.0
Carbon Disulfide	2,700 +	NS	3 J	4 J		1 J	2 J	4 J
1,2-Dichloroethene	100,000	500,000		19.0				3 J
Ethylbenzene	30,000	390,000		3 J	20.0		81.0	5 J
Methylene Chloride	51,000	500,000	9 BJ	10 BJ	10 BJ	14 B	13 BJ	12 B
Tetrachloroethene	5,500	150,000		2 J				
Toluene	100,000	500,000	2 J	8 J	5 J	5 J	9 J	3 J
Trichloroethene	10,000	200,000		28.0			7 J	
Total Xylenes	100,000	500,000		19.0	61.0	3 J	240 D	35.0
Semivolatile Organic Compounds (µg/kg or ppb)								
Benzo(a)anthracene	1,000	5,600					34 J	
Bis(2-ethylhexyl)phthalate	50,000 +	NS		44 J			44 J	
Dibenzofuran	14,000	350,000					300 J	100 J
2,4-Dichlorophenol	400 +	NS		51 J	42 J	78 J	140 J	
2,4-Dimethylphenol	NS	NS	40 J	76 J	97 J	62 J	210 J	26 J
Di-n-butylphthalate	8,100 +	NS				62 J		44 J
2-Methylphenol	100,000	500,000	22 J	50 J	160 J	84 J	210 J	
4-Methylphenol	34,000	500,000	110 J	160 J	210 J	23 J	270 J	
Naphthalene	100,000	500,000	260 J	1,000	640.0	500.0	2,100	220 J

Table 3-2 (continued).
Analytical Results of Confirmatory Samples Collected During the Press Pit Remediation at the Schreck's Scrapyard Site.

Sample Number Date Sampled Sample Depth Sample Location	Part 375 Residential Soil Cleanup Objective *	Part 375 Commercial Soil Cleanup Objective *	S-1 08/07/00 ± 15.0 North Wall	S-2 08/07/00 ± 15.0 East Wall	S-3 08/07/00 ± 15.0 South Wall	S-4 08/07/00 ± 15.0 West Wall	S-5 08/07/00 ± 15.0 East Floor	S-6 08/07/00 ± 15.0 West Floor
Semivolatile Organic Compounds (Continued)								
Phenol	100,000	500,000	200 J	4,000 D	34,000 D	14,000 D	28,000 D	440.0
2,4,6-Trichlorophenol	NS	NS		92 J	37 J	160 J	1,600	
Pesticides (µg/kg or ppb)								
beta-BHC	72.0	3,000					5.0	
Heptachlor	420.0	15,000					1.7 JP	
Methoxychlor	NS	NS					4.8 JP	
PCBs (µg/kg or ppb)								
Total PCBs	1,000	1,000						

***** **6 NYCRR Part 375: Environmental Remediation Programs, Restricted Use Soil Cleanup Objectives, NYSDEC, 2006.**
+ **NYSDEC Technical and Guidance Memorandum (TAGM) 4046: Determination of Soil Cleanup Objectives and Cleanup Levels, 1995.**
B **Analyte detected in the associated blank, as well as in the sample.**
D **Compound identified in an analysis at a secondary dilution factor.**
J **Compound reported at an estimated concentration below the sample quantitation limit.**
NS **No standard or guidance value available.**
P **>25% difference between the analytical results on two GC columns. The lower value is reported.**
Blanks indicate that the sample was analyzed for the associated compound but it was not detected.
Shaded values equal or exceed the Part 375 residential or TAGM 4046 soil cleanup objectives.
Hachured values equal or exceed both the Part 375 residential and commercial soil cleanup objectives.

Table 3-3.
Analytical Results of the Final Confirmatory Samples Collected During the State Funded Remediation of the Schreck's Scrapyard Site.

Sample Number **Date Sampled** **Sample Depth**	**Part 375** **Soil Cleanup** **Objective ***	**42** **10/27/93** **4.0'**	**58** **11/05/93** **8.0'**	**60** **11/10/93** **2.0'**	**74** **12/06/93** **4.0'**	**94** **12/15/93** **2.5'**
PCBs (µg/kg or ppb)						
Aroclor-1242						
Aroclor-1248			890			780
Aroclor-1254		2,600	1,600			
Aroclor-1260				400		
Total PCBs	1,000	**2,600**	**2,490**	400	ND (2,800)	780

Sample Number **Date Sampled** **Sample Depth**	**Part 375** **Soil Cleanup** **Objective ***	**157** **02/07/94** **0.0'**	**160** **02/07/94** **2.5'**	**161** **02/10/94** **0.0'**	**162** **02/10/94** **0.0'**	**163** **02/10/94** **0.0'**
PCBs (µg/kg or ppb)						
Aroclor-1242						
Aroclor-1248		63				
Aroclor-1254						
Aroclor-1260		37 J	110	910	3,600	6,100
Total PCBs	1,000	100	110	910	**3,600**	**6,100**

***** **6 NYCRR Part 375: Environmental Remediation Programs, Restricted Residential Soil Cleanup Objectives, NYSDEC, 2006.**
ND **Indicates that the compound was analyzed for but was not detected at the method detection limit in parentheses.**
Blanks also indicate that the compound was analyzed for but was not detected. ND's were not utilized to aid clarity.
Yellow shaded values equal or exceed the Part 375 soil cleanup objective (1.0 ppm) but are lower than the site action limit (10 ppm).

Table 4-1.
Analytical Results of Documentation Samples Collected During the State Funded Remediation of the Schreck's Scrapyard Site.

Sample Number Date Sampled Sample Depth Sample Location	Part 375 Residential Soil Cleanup Objective *	Part 375 Commercial Soil Cleanup Objective *	9 09/03/93 10.0' Test Trench 3	12 09/17/93 7.0' Test Trench 7	UST-1 11/09/93 10.0' UST Excavation 1	UST-2 12/14/93 10.0' UST Excavation 2	UST-3 01/11/94 10.0' UST Excavation 3
Volatile Organic Compounds (µg/kg or ppb)							
Acetone	100,000	500,000	ND (1,400)	65.0	NA	NA	NA
Benzene	2,900	44,000	ND (700)	ND (29)	ND (1)	900.0	ND (790)
n-Butylbenzene	10,000 +	NS	NA	ND (29)	2,700	2,500	**31,000**
sec-Butylbenzene	100,000	500,000	NA	NA	ND (1)	ND (1)	1,100
tert-Butylbenzene	100,000	500,000	NA	NA	3.1	920.0	ND (790)
Chloroform	10,000	350,000	ND (700)	46.0	NA	NA	NA
2-Chlorotoluene	NS	NS	NA	69.0	NA	NA	NA
Ethylbenzene	30,000	390,000	ND (700)	77.0	ND (1)	1,300	2,700
Isopropylbenzene	2,300 +	NS	NA	NA	**3,700**	1,360	**7,600**
n-Propylbenzene	100,000	500,000	NA	NA	1,200	ND (1)	4,500
Toluene	100,000	500,000	ND (700)	49.0	3,500	ND (1)	ND (790)
1,2,4-Trimethylbenzene	47,000	190,000	NA	750.0	3.1	920.0	30,000
1,3,5-Trimethylbenzene	47,000	190,000	NA	740.0	1,700	ND (1)	23,000
Total Xylenes	100,000	500,000	ND (700)	490.0	ND (1)	1,460	6,200
Semivolatile Organic Compounds (µg/kg or ppb)							
Anthracene	100,000	500,000	ND (56,000)	ND (3,900)	810.0	ND (300)	ND (2,100)
Bis(2-ethylhexyl)phthalate	50,000 +	NS	ND (56,000)	7,800	NA	NA	ND (2,100)
2-Methylnaphthalene	36,400 +	NS	ND (56,000)	ND (3,900)	NA	NA	19,000
Naphthalene	100,000	500,000	ND (56,000)	ND (3,900)	6,000 (2,080)	322.0	15,000 (4,100)
Phenanthrene	100,000	500,000	ND (56,000)	ND (3,900)	770.0	ND (300)	ND (2,100)

Table 4-1 (continued).
Analytical Results of Documentation Samples Collected During the State Funded Remediation of the Schreck's Scrapyard Site.

Sample Number Date Sampled Sample Depth Sample Location	Part 375 Residential Soil Cleanup Objective *	Part 375 Commercial Soil Cleanup Objective *	9 09/03/93 10.0' Test Trench 3	12 09/17/93 7.0' Test Trench 7	UST-1 11/09/93 10.0' UST Excavation 1	UST-2 12/14/93 10.0' UST Excavation 2	UST-3 01/11/94 10.0' UST Excavation 3
PCBs (µg/kg or ppb)							
Aroclor-1242			400 J				
Aroclor-1248							
Aroclor-1254			1,400				
Aroclor-1260			580 J				
Total PCBs	1,000	1,000	**2,380**	NA	NA	NA	NA

***** 6 NYCRR Part 375: Environmental Remediation Programs, Restricted Use Soil Cleanup Objectives, NYSDEC, 2006.
+ NYSDEC Technical and Guidance Memorandum (TAGM) 4046: Determination of Soil Cleanup Objectives and Cleanup Levels, 1995.
J Compound reported at an estimated concentration below the sample quantitation limit.
NA Not analyzed.
ND Indicates that the value was not detected at the method detection limit specified in parentheses.
NS No standard or guidance value available.
( ) Results of a duplicate analysis.
Yellow shaded values equal or exceed the Part 375 residential or TAGM 4046 soil cleanup objectives.
Orange Hachured values equal or exceed both the Part 375 residential and commercial soil cleanup objectives.

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TABLE 5-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF VOLATILE ORGANIC COMPOUND RESULTS
SHRECK'S SCRAPYARD SITE

Well MW-3

Analyte	Groundwater Standards*	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/13/10	5/27/11	5/24/12	5/13/13
Chloromethane	NS	U	U	U	U	NA	NA	U	U	U	U	U	U
Bromochloromethane	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Vinyl Chloride	2	U	U	U	U	NA	NA	U	U	U	U	U	U
Chloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Methylene Chloride	5	U	**9 BJ**	U	U	NA	NA	U	U	U	U	U	U
Acetone	50 G	U	3 BJ	U	2J	NA	NA	2.6 J	U	U	U	U	U
Carbon Disulfide	NS	U	U	U	U	NA	NA	U	U	U	U	U	U
1,1-Dichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
1,1-Dichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U	U
1,2-Dichloroethene (total)	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Chloroform	7	U	U	U	U	NA	NA	U	U	U	U	U	U
1,2-Dichloroethane	0.6	U	U	U	U	NA	NA	U	U	U	U	U	U
2-Butanone	50 G	U	2 BJ	U	U	NA	NA	U	U	U	U	U	U
1,1,1-Trichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Carbon Tetrachloride	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Bromodichloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U	U
1,2-Dichloropropane	1	U	U	U	U	NA	NA	U	U	U	U	U	U
cis-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U	U
Trichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Dibromochloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U	U
1,1,2-Trichloroethane	1	U	U	U	U	NA	NA	U	U	U	U	U	U
Benzene	1	U	U	U	U	NA	NA	U	U	U	U	U	U
Trans-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U	U
Bromoform	50 G	U	U	U	U	NA	NA	U	U	U	U	U	U
4-Methyl-2-Pentanone	NS	U	U	U	U	NA	NA	U	U	U	U	U	U
2-Hexanone	50 G	U	U	U	U	NA	NA	U	U	U	U	U	U
Tetrachloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
1,1,2,2-Tetrachloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Toluene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Chlorobenzene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Ethylbenzene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Styrene	5	U	U	U	U	NA	NA	U	U	U	U	U	U
Total Xylenes	5	U	U	U	U	NA	NA	U	U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

G Guidance value.

B Analyte found in the associated blank as well as the sample.

J Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA Not analyzed. Compound removed from long term monitoring in 2001 due to consistent non-detections.

NS No standard or guidance value available.

U Indicates that the compound was not detected.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 5-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF VOLATILE ORGANIC COMPOUND RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-4

Analyte	Groundwater Standards*	6/23/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	5/29/09	5/13/10	5/27/11	5/25/12	5/13/13
Chloromethane	NS	U	U	U	U	NA	NA	U	U	U	U	U
Bromochloromethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Vinyl Chloride	2	U	U	U	U	NA	NA	U	U	U	U	U
Chloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Methylene Chloride	5	U	**8 BJ**	U	U	NA	NA	U	U	U	U	U
Acetone	50 G	U	3 BJ	U	U	NA	NA	U	U	U	U	U
Carbon Disulfide	NS	U	U	U	U	NA	NA	U	U	U	U	U
1,1-Dichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
1,1-Dichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloroethene (total)	5	U	U	U	U	NA	NA	U	U	U	U	U
Chloroform	7	U	U	U	U	NA	NA	1.7	U	U	3.74	U
1,2-Dichloroethane	0.6	U	U	U	U	NA	NA	U	U	U	U	U
2-Butanone	50 G	U	2 BJ	U	U	NA	NA	U	U	U	U	U
1,1,1-Trichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Carbon Tetrachloride	5	U	U	U	U	NA	NA	U	U	U	U	U
Bromodichloromethane	50 G	U	U	U	U	NA	NA	0.66	U	U	U	U
1,2-Dichloropropane	1	U	U	U	U	NA	NA	U	U	U	U	U
cis-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U
Trichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
Dibromochloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,1,2-Trichloroethane	1	U	U	U	U	NA	NA	U	U	U	U	U
Benzene	1	U	U	U	U	NA	NA	U	U	U	U	U
Trans-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U
Bromoform	50 G	U	U	U	U	NA	NA	U	U	U	U	U
4-Methyl-2-Pentanone	NS	U	U	U	U	NA	NA	U	U	U	U	U
2-Hexanone	50 G	U	U	U	U	NA	NA	U	U	U	U	U
Tetrachloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
1,1,2,2-Tetrachloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Toluene	5	U	U	U	U	NA	NA	U	U	U	U	U
Chlorobenzene	5	U	U	U	U	NA	NA	U	U	U	U	U
Ethylbenzene	5	U	U	U	U	NA	NA	U	U	U	U	U
Styrene	5	U	U	U	U	NA	NA	U	U	U	U	U
Total Xylenes	5	U	U	U	U	NA	NA	U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

G Guidance value.

B Analyte found in the associated blank as well as the sample.

J Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA Not analyzed. Compound removed from long term monitoring in 2001 due to consistent non-detections.

NS No standard or guidance value available.

U Indicates that the compound was not detected.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 5-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF VOLATILE ORGANIC COMPOUND RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-5A[(1)]

Analyte	Groundwater Standards*	4/16/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/25/12	5/13/13
Chloromethane	NS	U	U	U	U	NA	NA	U	U	NA	U	U
Bromochloromethane	5	U	U	U	U	NA	NA	U	U	NA	U	U
Vinyl Chloride	2	U	U	U	U	NA	NA	U	U	NA	U	U
Chloroethane	5	U	U	U	U	NA	NA	U	U	NA	U	U
Methylene Chloride	5	U	**9 BJ**	U	U	NA	NA	U	U	NA	U	U
Methyl tert-Butyl Ether	10	NA	NA	NA	NA	NA	NA	**11**	**12**	NA	U	U
Acetone	51 G	U	U	U	U	NA	NA	2.4	U	NA	16.5	U
Carbon Disulfide	NS	U	U	U	U	NA	NA	U	U	NA	2.35	U
1,1-Dichloroethene	5	U	U	U	U	NA	NA	U	U	NA	U	U
1,1-Dichloroethane	5	U	U	U	U	NA	NA	U	U	NA	U	U
1,2-Dichloroethene (total)	5	U	U	U	U	NA	NA	U	U	NA	U	U
Chloroform	7	U	U	U	U	NA	NA	U	U	NA	U	U
1,2-Dichloroethane	0.6	U	U	U	U	NA	NA	U	U	NA	U	U
2-Butanone	50 G	U	U	U	U	NA	NA	U	U	NA	U	U
1,1,1-Trichloroethane	5	U	U	U	U	NA	NA	U	U	NA	U	U
Carbon Tetrachloride	5	U	U	U	U	NA	NA	U	U	NA	U	U
Bromodichloromethane	50 G	U	U	U	U	NA	NA	U	U	NA	U	U
1,2-Dichloropropane	1	U	U	U	U	NA	NA	U	U	NA	U	U
cis-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	NA	U	U
Trichloroethene	5	U	U	U	U	NA	NA	U	U	NA	U	U
Dibromochloromethane	50 G	U	U	U	U	NA	NA	U	U	NA	U	U
1,1,2-Trichloroethane	1	U	U	U	U	NA	NA	U	U	NA	U	U
Benzene	1	U	U	U	U	NA	NA	U	U	NA	U	U
Trans-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	NA	U	U
Bromoform	50 G	U	U	U	U	NA	NA	U	U	NA	U	U
4-Methyl-2-Pentanone	NS	U	U	U	U	NA	NA	U	U	NA	U	U
2-Hexanone	50 G	U	U	U	U	NA	NA	U	U	NA	U	U
Tetrachloroethene	5	U	U	U	U	NA	NA	U	U	NA	U	U
1,1,2,2-Tetrachloroethane	5	U	U	U	U	NA	NA	U	U	NA	U	U
Toluene	5	U	U	U	U	NA	NA	U	U	NA	U	U
Chlorobenzene	5	U	U	U	U	NA	NA	U	U	NA	U	U
Ethylbenzene	5	U	U	U	U	NA	NA	U	U	NA	U	U
Styrene	5	U	U	U	U	NA	NA	U	U	NA	U	U
Total Xylenes	5	U	U	U	U	NA	NA	U	U	NA	U	U

All concentrations in ug/l.

(1) Formerly MW-5R

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

G Guidance value.

B Analyte found in the associated blank as well as the sample.

J Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA Not analyzed. Compound removed from long term monitoring in 2001 due to consistent non-detections.

NS No standard or guidance value available.

U Indicates that the compound was not detected.

Well MW-5R not sampled in 2011 due to well blockage

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 5-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF VOLATILE ORGANIC COMPOUND RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-6R

Analyte	Groundwater Standards*	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/24/12	5/13/13
Chloromethane	NS	U	U	U	U	NA	NA	U	U	U	U	U
Bromochloromethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Vinyl Chloride	2	U	U	U	U	NA	NA	U	U	U	U	U
Chloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Methylene Chloride	5	U	**9 BJ**	U	U	NA	NA	U	U	U	U	U
Acetone	50 G	U	U	U	3J	NA	NA	2.2 J	U	U	U	U
Carbon Disulfide	NS	U	U	U	U	NA	NA	U	U	U	U	U
1,1-Dichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
1,1-Dichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloroethene (total)	5	U	U	U	U	NA	NA	U	U	U	U	U
Chloroform	7	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloroethane	0.6	U	U	U	U	NA	NA	U	U	U	U	U
2-Butanone	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,1,1-Trichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Carbon Tetrachloride	5	U	U	U	U	NA	NA	U	U	U	U	U
Bromodichloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloropropane	1	U	U	U	U	NA	NA	U	U	U	U	U
cis-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U
Trichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
Dibromochloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,1,2-Trichloroethane	1	U	U	U	U	NA	NA	U	U	U	U	U
1,4-Dichlorobenzene	3							0.45 J	U	U	U	U
Benzene	1	**6 J**	U	**2 J**	**27**	NA	**16**	0.40 J	U	**2.36**	U	**1.1**
Trans-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U
Bromoform	50 G	U	U	U	U	NA	NA	U	U	U	U	U
4-Methyl-2-Pentanone	NS	U	U	U	U	NA	NA	U	U	U	U	U
2-Hexanone	50 G	U	U	U	U	NA	NA	U	U	U	U	U
Tetrachloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
1,1,2,2-Tetrachloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Toluene	5	2 J	U	U	U	NA	U	U	U	U	U	U
Chlorobenzene	5	U	U	1 J	4 J	NA	NA	3.9	U	U	U	**5.7**
Ethylbenzene	5	U	U	U	U	NA	U	U	U	U	U	U
Styrene	5	U	U	U	U	NA	NA	U	U	U	U	U
Total Xylenes	5	U	U	U	U	NA	U	U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

G Guidance value.

B Analyte found in the associated blank as well as the sample.

J Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA Not analyzed. Compound removed from long term monitoring in 2001 due to consistent non-detections. 8021 STARS ran on 6/11/02.

NS No standard or guidance value available.

U Indicates that the compound was not detected.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 5-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF VOLATILE ORGANIC COMPOUND RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-7

Analyte	Groundwater Standards*	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/25/12	5/13/13
Chloromethane	NS	U	U	U	U	NA	NA	U	U	U	U	U
Bromochloromethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Vinyl Chloride	2	U	U	U	U	NA	NA	U	U	U	U	U
Chloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Methylene Chloride	5	U	**10 BJ**	U	U	NA	NA	U	U	U	U	U
Acetone	50 G	U	U	U	U	NA	NA	U	U	U	U	U
Carbon Disulfide	NS	U	U	U	U	NA	NA	U	U	U	U	U
1,1-Dichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
1,1-Dichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloroethene (total)	5	U	U	U	U	NA	NA	U	U	U	U	U
Chloroform	7	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloroethane	0.6	U	U	U	U	NA	NA	U	U	U	U	U
2-Butanone	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,1,1-Trichloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Carbon Tetrachloride	5	U	U	U	U	NA	NA	U	U	U	U	U
Bromodichloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,2-Dichloropropane	1	U	U	U	U	NA	NA	U	U	U	U	U
cis-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U
Trichloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
Dibromochloromethane	50 G	U	U	U	U	NA	NA	U	U	U	U	U
1,1,2-Trichloroethane	1	U	U	U	U	NA	NA	U	U	U	U	U
Benzene	1	U	U	U	U	NA	NA	U	U	U	U	U
Trans-1,3-dichloropropene	0.4	U	U	U	U	NA	NA	U	U	U	U	U
Bromoform	50 G	U	U	U	U	NA	NA	U	U	U	U	U
4-Methyl-2-Pentanone	NS	U	U	U	U	NA	NA	U	U	U	U	U
2-Hexanone	50 G	U	U	U	U	NA	NA	U	U	U	U	U
Tetrachloroethene	5	U	U	U	U	NA	NA	U	U	U	U	U
1,1,2,2-Tetrachloroethane	5	U	U	U	U	NA	NA	U	U	U	U	U
Toluene	5	U	U	U	U	NA	NA	U	U	U	U	U
Chlorobenzene	5	U	U	U	U	NA	NA	U	U	U	U	U
Ethylbenzene	5	U	U	U	U	NA	NA	U	U	U	U	U
Styrene	5	U	U	U	U	NA	NA	U	U	U	U	U
Total Xylenes	5	U	U	U	U	NA	NA	U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

G Guidance value.

B Analyte found in the associated blank as well as the sample.

J Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA Not analyzed. Compound removed from long term monitoring in 2001 due to consistent non-detections.

NS No standard or guidance value available.

U Indicates that the compound was not detected.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 6-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF PESTICIDES/PCB RESULTRY
SCHRECK'S SCRAPYARD SITE

Well MW-3

Date Sampled	Groundwater Standard*	5/10/95	9/5/95	12/19/95	8/1/96	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/24/12	5/13/13
alpha-BHC	0.01	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
beta-BHC	0.04	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
delta-BHC	0.04	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
gamma-BHC (Lindane)	0.05	0.029 JP	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Heptachlor	0.04	U	U	U	U	0.0034 JP	U	U	U	U	U	NA	NA	NA	NA	NA
Aldrin	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Heptachlor epoxide	0.03	U	U	U	U	0.010 JP	U	U	U	U	U	NA	NA	NA	NA	NA
Endosulfan I	ND	U	U	U	U	0.0086 JP	U	U	U	U	U	NA	NA	NA	NA	NA
Dieldrin	0.004	U	U	U	U	**0.012 J**	U	U	U	U	U	NA	NA	NA	NA	NA
4,4'-DDE	0.2	U	0.016 JP	U	U	0.0070 JP	U	U	U	U	U	NA	NA	NA	NA	NA
Endrin	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endosulfan II	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
4,4' - DDD	0.3	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endosulfan sulfate	ND	U	U	U	U	U	U	U	0.10 P	U	U	NA	NA	NA	NA	NA
4,4'-DDT	0.2	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Methoxychlor	35	U	U	U	U	U	U	U	0.34 JP	U	U	NA	NA	NA	NA	NA
Endrin ketone	5	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endrin aldehyde	5	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
alpha-Chlordane	0.05	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
gamma -Chlordane	0.05	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Toxaphene	0.06	U	U	U	U	U	U	U	U	NA	U	NA	NA	NA	NA	NA
Aroclor-1016	0.09[1]	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1221		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1232		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1242		**0.48 JP**	**1.2**	**0.31 JP**	U	U	U	**1.0 PX**	U	U	U	U	U	U	U	U
Aroclor-1248		U	U	U	U	U	U	U	**4.1**	U	U	**0.46**	U	U	U	U
Aroclor-1254		U	U	U	U	U	U	**0.59 JPX**	U	U	U	U	U	U	U	U
Aroclor-1260		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

J - Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA - Not analyzed.

ND - No detection standard established.

P >25% difference between the analytical results on two GC columns. The lower value is reported.

X - Manually integrated and calculated.

U - Indicates that the compound was not detected.

(1) Groundwater standard 0.09 applies to the sum of these substances.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 6-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF PESTICIDES/PCB RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-4

Date Sampled	Groundwater Standard*	5/10/95	9/5/95	12/19/95	8/1/96	6/23/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/25/12	5/13/13
alpha-BHC	0.01	U	U	U	U	0.0072 J	U	U	U	U	U	NA	NA	NA	NA	NA
beta-BHC	0.04	U	U	U	U	0.0090 JP	U	U	U	U	U	NA	NA	NA	NA	NA
delta-BHC	0.04	U	U	U	U	0.0067 J	U	U	U	U	U	NA	NA	NA	NA	NA
gamma-BHC (Lindane)	0.05	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Heptachlor	0.04	U	U	U	U	0.0054 JP	U	U	U	U	U	NA	NA	NA	NA	NA
Aldrin	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Heptachlor epoxide	0.03	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endosulfan I	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Dieldrin	0.004	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
4,4'-DDE	0.2	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endrin	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endosulfan II	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
4,4' - DDD	0.3	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endosulfan sulfate	ND	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
4,4'-DDT	0.2	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Methoxychlor	35	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endrin ketone	5	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Endrin aldehyde	5	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
alpha-Chlordane	0.05	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
gamma -Chlordane	0.05	U	U	U	U	U	U	U	U	U	U	NA	NA	NA	NA	NA
Toxaphene	0.06	U	U	U	U	U	U	U	U	NA	U	NA	NA	NA	NA	NA
Aroclor-1016	0.09(1)	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1221		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1232		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1242		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1248		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1254		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Aroclor-1260		U	**0.14 JP**	**0.57 JP**	U	**0.18 JP**	U	**0.69 JPX**	**1.1 P**	U	**0.39 JP**	U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

J - Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA - Not analyzed.

ND - No detection standard established.

P >25% difference between the analytical results on two GC columns. The lower value is reported.

X - Manually integrated and calculated.

U - Indicates that the compound was not detected.

(1) Groundwater standard 0.09 applies to the sum of these substances.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 6-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF PESTICIDES/PCB RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-5A[(1)]

Date Sampled	Groundwater Standard*	5/10/95	9/5/95	12/19/95	8/1/96	4/16/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/25/12	5/13/13
alpha-BHC	0.01	U	U	U	U	U	U	U	U	U	NOT SAMPLED	NA	NA	NOT SAMPLED	NA	NA
beta-BHC	0.04	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
delta-BHC	0.04	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
gamma-BHC (Lindane)	0.05	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Heptachlor	0.04	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Aldrin	ND	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Heptachlor epoxide	0.03	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Endosulfan I	ND	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Dieldrin	0.004	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
4,4'-DDE	0.2	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Endrin	ND	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Endosulfan II	ND	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
4,4' - DDD	0.3	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Endosulfan sulfate	ND	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
4,4'-DDT	0.2	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Methoxychlor	35	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Endrin ketone	5	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Endrin aldehyde	5	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
alpha-Chlordane	0.05	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
gamma -Chlordane	0.05	U	U	U	U	U	U	U	U	U		NA	NA		NA	NA
Toxaphene	0.06	U	U	U	U	U	U	U	U	NA		NA	NA		NA	NA
Aroclor-1016	0.09[(1)]	U	U	U	U	U	U	U	U	U		U	U		U	U
Aroclor-1221		U	U	U	U	U	U	U	U	U		U	U		U	U
Aroclor-1232		U	U	U	U	U	U	U	U	U		U	U		U	U
Aroclor-1242		U	U	U	U	U	U	U	U	U		U	U		U	U
Aroclor-1248		U	U	U	U	U	U	U	U	U		U	U		U	U
Aroclor-1254		U	U	U	U	U	U	U	U	U		U	U		U	U
Aroclor-1260		U	U	U	U	U	U	U	U	U		U	U		U	U

All concentrations in ug/l.

(1) Formerly MW-5R

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

J - Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA - Not analyzed.

ND - No detection standard established.

P >25% difference between the analytical results on two GC columns. The lower value is reported.

X - Manually integrated and calculated.

U - Indicates that the compound was not detected.

(1) Groundwater standard 0.09 applies to the sum of these substances.

Well MW-5R not sampled in 2011 due to well blockage

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 6-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF PESTICIDES/PCB RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-6R

Date Sampled	Groundwater Standard*	5/10/95	9/5/95	12/19/95	8/1/96	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	11/2/06	5/13/10	5/27/11	5/25/12	5/13/13
alpha-BHC	0.01	U	U	U	U	U	U	U	U	U	NOT SAMPLED	NA	NA	NA	U	NA
beta-BHC	0.04	0.019 JP	0.020 JP	U	U	U	U	U	U	U		NA	NA	NA	U	NA
delta-BHC	0.04	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
gamma-BHC (Lindane)	0.05	U	U	U	U	0.018 JP	U	U	U	U		NA	NA	NA	U	NA
Heptachlor	0.04	U	U	U	U	U	U	U	0.011 JP	U		NA	NA	NA	U	NA
Aldrin	ND	U	U	U	U	U	U	U	U	U		NA	NA	NA	NA	NA
Heptachlor epoxide	0.03	U	U	U	U	U	U	U	U	U		NA	NA	NA	NA	NA
Endosulfan I	ND	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Dieldrin	0.004	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
4,4'-DDE	0.2	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Endrin	ND	U	U	U	U	U	U	**0.14**	U	U		NA	NA	NA	U	NA
Endosulfan II	ND	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
4,4' - DDD	0.3	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Endosulfan sulfate	ND	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
4,4'-DDT	0.2	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Methoxychlor	35	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Endrin ketone	5	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Endrin aldehyde	5	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
alpha-Chlordane	0.05	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
gamma -Chlordane	0.05	U	U	U	U	U	U	U	U	U		NA	NA	NA	U	NA
Toxaphene	0.06	U	U	U	U	U	U	U	U	NA		NA	NA	NA	U	NA
Aroclor-1016	0.09[1]	U	U	U	U	U	U	U	U	U		U	U	U	U	U
Aroclor-1221		U	U	U	U	U	U	U	U	U		U	U	U	U	U
Aroclor-1232		U	U	U	U	U	U	U	U	U		U	U	U	U	U
Aroclor-1242		U	U	U	U	U	U	U	U	U		U	U	U	U	U
Aroclor-1248		U	U	U	U	U	U	U	U	U		U	U	U	U	U
Aroclor-1254		U	U	U	U	U	U	U	U	U		U	U	U	U	U
Aroclor-1260		U	U	U	U	U	U	U	U	U		U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

J - Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA - Not analyzed.

ND - No detection standard established.

P >25% difference between the analytical results on two GC columns. The lower value is reported.

X - Manually integrated and calculated.

U - Indicates that the compound was not detected.

(1) Groundwater standard 0.09 applies to the sum of these substances.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 6-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF PESTICIDES/PCB RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-7

Date Sampled	Groundwater Standard*	5/10/95	9/5/95	12/19/95	8/1/96	6/23/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	5/28/09	5/13/10	5/27/11	5/25/12	5/13/13
alpha-BHC	0.01					U	U	U	U	U	NOT SAMPLED	NA	NA	NA	U	NA
beta-BHC	0.04					U	U	U	U	U		NA	NA	NA	U	NA
delta-BHC	0.04					0.0069 JP	U	U	U	U		NA	NA	NA	U	NA
gamma-BHC (Lindane)	0.05					U	U	U	U	U		NA	NA	NA	U	NA
Heptachlor	0.04					U	U	U	U	U		NA	NA	NA	U	NA
Aldrin	ND					U	U	U	U	U		NA	NA	NA	U	NA
Heptachlor epoxide	0.03					U	U	U	U	U		NA	NA	NA	NA	NA
Endosulfan I	ND					U	U	U	U	U		NA	NA	NA	NA	NA
Dieldrin	0.004					U	U	U	U	U		NA	NA	NA	U	NA
4,4'-DDE	0.2					0.011 JP	U	U	U	U		NA	NA	NA	U	NA
Endrin	ND					U	U	**0.073 J**	U	U		NA	NA	NA	U	NA
Endosulfan II	ND					U	U	U	U	U		NA	NA	NA	U	NA
4,4' - DDD	0.3					U	U	U	U	U		NA	NA	NA	U	NA
Endosulfan sulfate	ND					U	U	U	U	U		NA	NA	NA	U	NA
4,4'-DDT	0.2					U	U	U	U	U		NA	NA	NA	U	NA
Methoxychlor	35					U	U	U	U	U		NA	NA	NA	U	NA
Endrin ketone	5					U	U	U	U	U		NA	NA	NA	U	NA
Endrin aldehyde	5					U	U	U	U	U		NA	NA	NA	U	NA
alpha-Chlordane	0.05					U	U	U	U	U		NA	NA	NA	U	NA
gamma -Chlordane	0.05					U	U	U	U	U		NA	NA	NA	U	NA
Toxaphene	0.06					U	U	U	U	NA		NA	NA	NA	U	NA
Aroclor-1016	0.09(1)					U	U	U	U	U		U	U	U	U	U
Aroclor-1221						U	U	U	U	U		U	U	U	U	U
Aroclor-1232						U	U	U	U	U		U	U	U	U	U
Aroclor-1242						U	U	U	U	U		U	U	U	U	U
Aroclor-1248						U	U	U	U	U		U	U	U	U	U
Aroclor-1254						U	U	U	U	U		U	U	U	U	U
Aroclor-1260						U	U	U	U	U		U	U	U	U	U

All concentrations in ug/l.

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

J - Estimated value. The indicated value is less than the sample quantification limit but greater than zero.

NA - Not analyzed.

ND - No detection standard established.

P >25% difference between the analytical results on two GC columns. The lower value is reported.

X - Manually integrated and calculated.

U - Indicates that the compound was not detected.

(1) Groundwater standard 0.09 applies to the sum of these substances.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 7-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF TOTAL METAL RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-3

Date Sampled	Groundwater Standards*	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	Dissolved 5/28/09	Total 5/28/09	Total 5/13/10	Total 5/27/11	Total 5/24/12	Total 5/13/13
Aluminum	NS	7,880	5,810	6,160	2,490	NOT SAMPLED	1,700	U	U	U	U	1,220	762
Antimony	3	U	U	U	U		U	U	U	U	U	U	U
Arsenic	25	U	4.6 B	11.7	9.5 B		U	U	U	U	U	U	U
Barium	1,000	152 B	112 B	142 B	128 B		101 B	134	138	115	U	109	113
Beryllium	3 G	U	U	U	U		0.30 B	U	U	U	U	U	U
Cadmium	5	U	0.64 B	U	U		0.30 B	U	U	U	U	U	U
Calcium	NS	158,000	139,000	143,000	163,000		148,000	203,000	207,000	184,000	U	170,000	184,000
Chromium	50	11.3	9.7 B	12.7	8.8 B		4.8 B	U	U	U	U	U	U
Cobalt	NS	5.4 B	3.3 B	4.4 B	1.9 B		1.9 B	U	U	U	U	U	U
Copper	200	14.8 B	16.3 B	20.0 B	14.4 B		7.6 B	U	U	U	U	U	U
Iron	500	**11,300**	**17,200**	**26,300**	**19,000**		**3,800**	**534**	**1,970**	**370**	U	**2,200**	**1,800**
Lead	25	7.2	7.6	12.4	10.2		3.7	U	U	U	U	U	U
Magnesium	35,000 G	28,300	26,000	27,500	30,500		27,100	29,400	28,800	24,800	U	24,700	26,900
Manganese	300	**790**	**982**	**1,050**	**568**		**729**	275	**323**	179	U	**393**	291
Mercury	0.7	0.2	0.1	U	U		U	U	U	U	U	U	U
Nickel	100	12.1 B	9.8 B	10.1 B	7.4 B		6.1 B	11.9	14.2	U	U	U	U
Potassium	NS	5,480	3,350	3,630 B	3,670 B		3,220 B	4,220	4,060	3,800	U	5,450	U
Selenium	10	4.0 B	U	U	U		U	U	U	11	U	U	U
Silver	50	U	U	2.1	U		U	U	U	U	U	U	U
Sodium	20,000	19,500	15,600	11,000	12,700		8,690	**22,400**	**21,900**	**29,900**	U	**38,000**	**42,300**
Thallium	0.5 G	U	U	U	U		U	U	U	U	U	U	U
Vanadium	NS	16.9	12.0 B	26.3 B	8.0 B		3.6 B	U	U	U	U	U	U
Zinc	2,000	76.6	32.5	59.6	44.9		12.0 B	30.9	10.7	U	U	U	26

All concentrations in µg/l.
* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.
G - Guidance value.
B - Value greater than or equal to the instrument detection limit, but less than the contract required detection limit.
NA - Compound not analyzed.
NS - No standard or guidance value available.
U - Indicates that the compound was not detected.
Total represents a total metal analysis including the metal content dissolved in the water and present in the particles in the water.
Dissolved represents a dissolved metals analysis of a water sample after removing the particles with a filter then analyzing the filtered water for metals.
Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 7-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF TOTAL METAL RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-4

Date Sampled	Groundwater Standards*	6/23/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	Dissolved 5/29/09	Total 5/29/09	Total 5/13/10	Total 5/27/11	Total 5/24/12	Total 5/13/13
Aluminum	NS	21,900	208	111,000	31,500	NOT SAMPLED	31,700	U	2,650	740	481	U	2,470
Antimony	3	U	U	U	**14.1 B**		U	U	U	U	U	U	U
Arsenic	25	19.3	U	9.9 B	23		21.9	U	U	U	U	U	U
Barium	1,000	190 B	25.5 B	93.3 B	229		245	224	37.9	35	U	U	U
Beryllium	3 G	1.5 B	U	U	1.6 B		1.9 B	U	U	U	U	U	U
Cadmium	5	U	1.3 B	1.3 B	2.8 B		2.0 B	U	U	U	U	U	U
Calcium	NS	80,800	36,700	38,000	60,400		73,900	35,200	35,200	44,300	U	81,400	41,400
Chromium	50	49.9	2.2 B	39.3 B	**92.8**		**72.9**	U	6	U	U	U	44.6
Cobalt	NS	12.4 B	U	5.9 B	16.8 B		18.8 B	U	U	U	U	U	U
Copper	200	82.7	7.9 B	52.9	151		116	U	U	U	U	U	U
Iron	500	**34,200**	360	**16,900**	**50,600**		**50,000**	U	**2,660**	**660**	U	143	**2,620**
Lead	25	**79.8**	U	**59.1**	**225**		**122**	U	11.6	**U**	U	U	14.5
Magnesium	35,000 G	26,300	5,290	11,700	24,200		29,100	4,310	5,100	5,800	U	14,500	6,870
Manganese	300	**537**	8.6 B	256	**622**		**674**	19.8	63.7	U	U	86	52.4
Mercury	0.7	**3.6**	U	U	**9.9**		**6**	U	U	U	U	U	U
Nickel	100	46.7	U	26.2 B	77.2		66.7	U	U	U	U	U	U
Potassium	NS	6,490	1,320 B	3,910 B	8,780		8,760	1,300	2,080	2500	U	3,350	U
Selenium	10	U	U	U	7.4		7.6	U	U	U	U	U	U
Silver	50	U	U	U	U		U	U	U	U	U	U	U
Sodium	20,000	7,600	907 B	4,050 B	5,550		1,650 B	3,000	3,200	11700	U	**28,600**	5,310
Thallium	0.5 G	U	U	U	U		U	U	U	U	U	U	U
Vanadium	NS	43.6 B	U	23.1 B	62.6		57.3	U	U	U	U	U	U
Zinc	2,000	**2,790**	229	1,730	**5,320**		**3,700**	30.9	266	61	U	U	174

All concentrations in µg/l.
* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.
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NS - No standard or guidance value available.
U - Indicates that the compound was not detected.
Total represents a total metal analysis including the metal content dissolved in the water and present in the particles in the water.
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Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 7-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF TOTAL METAL RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-5A[(1)]

Date Sampled	Groundwater Standards*	4/16/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	Dissolved 5/28/09	Total 5/28/09	Total 5/13/10	Total 5/27/11	Total 5/24/12	Total 5/13/13
Aluminum	NS	1,550	577	1,240	9,320	NOT SAMPLED	523	U	U	U	NOT SAMPLED	U	4,220
Antimony	3	U	U	U	U		U	U	U	U		U	U
Arsenic	25	5.4 B	U	7.7 B	15.8		U	U	U	U		U	21.8
Barium	1,000	63.1 B	46.7 B	63.7 B	122 B		49.9 B	29.1	31.4	32		U	53.3
Beryllium	3 G	U	U	U	U		0.30 B	U	U	U		U	U
Cadmium	5	1.7 B	1.7 B	2.1 B	2.8 B		**7**	U	U	U		U	U
Calcium	NS	124,000	120,000	132,000	152,000		126,000	106,000	111,000	113,000		140,000	126,000
Chromium	50	8.8 B	4.4 B	10.2	17		**59**	U	U	U		U	U
Cobalt	NS	U	1.5	2.3 B	7 B		1.4 B	U	U	U		U	U
Copper	200	11.0 B	13.7 B	12.9 B	16.1 B		4.3 B	U	U	4		U	U
Iron	500	**2,330**	**935**	**1,740**	**13,000**		**1,320**	225	380	420		**753**	**11,700**
Lead	25	U	U	U	9.4		2.4 B	U	U	U		U	U
Magnesium	35,000 G	**55,300**	**52,600**	**54,700**	**62,600**		**57,300**	**50,500**	**51,300**	**48,700**		**54,300**	**54,600**
Manganese	300	246	130	189	**448**		180	114	130	113		144	163
Mercury	0.7	U	U	U	0.3		U	U	U	U		U	U
Nickel	100	20.2 B	14.9 B	18.8 B	24.8 B		37.8 B	U	U	U		U	U
Potassium	NS	3,350 B	2,250 B	2,520 B	5,060		2,270 B	1,430	1,510	U		4,130	U
Selenium	10	U	U	U	U		U	U	U	14		U	U
Silver	50	U	U	U	U		U	U	U	U		U	U
Sodium	20,000	**61,000**	**56,300**	**67,100**	**68,500**		**69,600**	**56,800**	**58,800**	**59,400**		**64,500**	**64,900**
Thallium	0.5 G	U	U	U	U		U	U	U	U		U	U
Vanadium	NS	3.3 B	U	6.4 B	17.5 B		1.8 B	U	U	U		U	U
Zinc	2,000	34.1	22.4	50.7	67.6		11.3 B	U	U	U		63	85.3

(1) Formerly MW-5R

* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.

All concentrations in µg/l.

G - Guidance value.

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NA - Compound not analyzed.

NS - No standard or guidance value available.

U - Indicates that the compound was not detected.

Total represents a total metal analysis including the metal content dissolved in the water and present in the particles in the water.

Dissolved represents a dissolved metals analysis of a water sample after removing the particles with a filter then analyzing the filtered water for metals.

Well MW-5R not sampled in 2011 due to blockage in well.

Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 7-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF TOTAL METAL RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-6R

Date Sampled	Groundwater Standards*	4/16/97	6/17/98	4/21/99	5/31/00	5/16/01	6/11/02	Dissolved 5/28/09	Total 5/28/09	Total 5/13/10	Total 5/27/11	Total 5/24/12	Total 5/13/13
Aluminum	NS	19,100	3,630	13,900	7,990	NOT SAMPLED	19,900	U	8,650	190	U	205	401
Antimony	3	U	U	U	U		U	U	U	U	U	U	U
Arsenic	25	6.8 B	U	13.8	U		8.9 B	U	U	U	U	U	U
Barium	1,000	375	212	185 B	299		282	167	213	185	U	112	90.5
Beryllium	3 G	1.2 B	U	U	U		1.0 B	U	U	U	U	U	U
Cadmium	5	U	1.1 B	U	U		1.4 B	U	U	U	U	U	U
Calcium	NS	194,000	112,000	252,000	163,000		179,000	172,000	184,000	182,000	U	145	148,000
Chromium	50	31.3	22.1	24.6	13.7		37.4	U	**135**	U	U	U	U
Cobalt	NS	18.8 B	2.6 B	11.2 B	6.6 B		18.5 B	U	9.7	U	U	U	U
Copper	200	35.9	11.3 B	30.1	12.4 B		43.2	U	12.5	U	U	U	U
Iron	500	**29,900**	**5,670**	**22,600**	**10,700**		**31,100**	314	**11,300**	380	U	438	**505**
Lead	25	14.9	4.8	11.8	9.7		18.9	U	5.2	U	U	U	U
Magnesium	35,000 G	**35,800**	21,100	**37,600**	31,000		**38,800**	32,100	**35,400**	31,400	U	29,000	30,100
Manganese	300	**793**	263	**554**	**392**		**852**	294	**505**	283	U	257	207
Mercury	0.7	U	U	U	U		U	U	U	U	U	U	U
Nickel	100	37.7 B	12.8 B	35.5 B	15.3 B		**198**	U	**163**	U	U	U	U
Potassium	NS	16,800	8,980	11,000	12,600		14,400 B	6,300	9030	5,900	U	7,250	6,100
Selenium	10	U	U	7.5	U		U	U	U	14	U	U	U
Silver	50	U	U	U	U		U	U	U	U	U	U	U
Sodium	20,000	**84,300**	**74,200**	**92,800**	**140,000**		**97,400**	**73,800**	**72,000**	**87,900**	U	**76,300**	**77,100**
Thallium	0.5 G	**5.1 B**	U	U	U		U	U	U	U	U	U	U
Vanadium	NS	45.1 B	9.3 B	34.3 B	17.5 B		40.4 B	U	18.4	U	U	U	U
Zinc	2,000	209	21.5	113	46.8		107	U	33.2	U	U	U	U

All concentrations in µg/l.
* NYSDEC Ambient Water Quality Standards and Guidance Values, June 1998.
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Shaded values equal or exceed groundwater standards or guidance values.

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TABLE 7-1
PERIODIC REVIEW GROUNDWATER MONITORING REPORT
SUMMARY OF TOTAL METAL RESULTS
SCHRECK'S SCRAPYARD SITE

Well MW-7

Date Sampled	Groundwater Standards*	6/23/97	6/18/98	4/21/99	5/31/00	5/16/01	6/11/02	Dissolved 5/28/09	Total 5/28/09	Dissolved 5/13/10	Total 5/13/10	Total 5/27/11	Total 5/25/12	Total 5/13/13
Aluminum	NS	276,000	45,700	17,200	49,200	NOT SAMPLED	31,600	U	592	U	3,680	714	7,390	2,380
Antimony	3	U	U	U	U		U	U	U	U	U	U	U	U
Arsenic	25	**151**	19.5	9.0 B	22.4		14.3	U	U	U	NA	U	U	U
Barium	1,000	**2,080**	347	137 B	370		202	15	16.2	U	NA	U	U	U
Beryllium	3 G	**12.5**	2.3 B	U	1.9 B		1.6 B	U	U	U	NA	U	U	U
Cadmium	5	U	U	U	1.9 B		0.79 B	U	U	U	NA	U	U	U
Calcium	NS	1,190,000	232,000	141,000	242,000		167,000	112,000	106,000	110,000	NA	101,000	107,000	111,000
Chromium	50	**403**	**67.3**	24.4	**71.9**		45.6	U	U	U	NA	U	U	U
Cobalt	NS	224	34.6 B	12.2 B	41.9 B		25.3 B	U	U	U	NA	U	U	U
Copper	200	**653**	74.8	34.5	67		40.7	U	U	U	NA	U	U	U
Iron	500	**486,000**	**78,400**	**24,700**	**80,400**		**51,700**	U	**519**	**U**	NA	**735**	**7,110**	**3,000**
Lead	25	**281**	**37.1**	10.8	**42**		24.7	U	U	U	NA	U	U	U
Magnesium	35,000 G	**333,000**	**86,800**	**59,100**	**91,500**		**69,600**	**52,100**	**48,400**	**48,400**	NA	**46,300**	**48,000**	**48,800**
Manganese	300	**9,470**	**1,570**	**486**	**1,810**		**1,250**	8	35	19	NA	15	146	72.9
Mercury	0.7	0.69	U	U	U		U	U	U	U	NA	U	U	0.48
Nickel	100	**500**	79.8	25.1 B	84.2		51.6	U	U	U	NA	U	U	U
Potassium	NS	46,000	12,500	7,200	13,200		9,640	1,600	1,500	U	NA	U	4,470	U
Selenium	10	**47.1**	U	5.2	5.6		4.4 B	U	U	**12**	NA	U	U	U
Silver	50	U	U	U	U		U	U	U	U	NA	U	U	U
Sodium	20,000	**71,800**	**61,400**	**73,100**	**79,800**		**73,200**	**73,500**	**69,700**	**75,900**	NA	**62,700**	**69,800**	**74,300**
Thallium	0.5 G	**30.1**	U	U	U		U	U	U	U	NA	U	U	U
Vanadium	NS	516	83.5	36.8 B	87.8		57.6	U	U	U	NA	U	U	U
Zinc	2,000	1,660	225	93.9	278		131	32	U	U	NA	U	U	U

All concentrations in µg/l.
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NYSDEC DER-10, Appendix 5
Allowable Constituent Levels for Imported Fill or Soil
Subdivision 5.4(e)

Source: This table is derived from soil cleanup objective (SCO) tables in 6 NYCRR 375. Table 375-6.8(a) is the source for unrestricted use and Table 375-6.8(b) is the source for restricted use.

Note: For constituents not included in this table, refer to the contaminant for supplemental soil cleanup objectives (SSCOs) in the Commissioner Policy on *Soil Cleanup Guidance*. If an SSCO is not provided for a constituent, contact the DER PM to determine a site-specific level.

Constituent	Unrestricted Use	Residential Use	Restricted Residential Use	Commercial or Industrial Use	If Ecological Resources are Present
Metals					
Arsenic	13	16	16	16	13
Barium	350	350	400	400	433
Beryllium	7.2	14	47	47	10
Cadmium	2.5	2.5	4.3	7.5	4
Chromium, Hexavalent[1]	1 [3]	19	19	19	1 [3]
Chromium, Trivalent[1]	30	36	180	1500	41
Copper	50	270	270	270	50
Cyanide	27	27	27	27	NS
Lead	63	400	400	450	63
Manganese	1600	2000	2000	2000	1600
Mercury (total)	0.18	0.73	0.73	0.73	0.18
Nickel	30	130	130	130	30
Selenium	3.9	4	4	4	3.9
Silver	2	8.3	8.3	8.3	2
Zinc	109	2200	2480	2480	109
PCBs/Pesticides					
2,4,5-TP Acid (Silvex)	3.8	3.8	3.8	3.8	NS
4,4'-DDE	0.0033 [3]	1.8	8.9	17	0.0033 [3]
4,4'-DDT	0.0033 [3]	1.7	7.9	47	0.0033 [3]
4,4'-DDD	0.0033 [3]	2.6	13	14	0.0033 [3]
Aldrin	0.005	0.019	0.097	0.19	0.14
Alpha-BHC	0.02	0.02	0.02	0.02	0.04 [4]
Beta-BHC	0.036	0.072	0.09	0.09	0.6
Chlordane (alpha)	0.094	0.91	2.9	2.9	1.3
Delta-BHC	0.04	0.25	0.25	0.25	0.04 [4]
Dibenzofuran	7	14	59	210	NS
Dieldrin	0.005	0.039	0.1	0.1	0.006
Endosulfan I	2.4[2]	4.8	24	102	NS
Endosulfan II	2.4[2]	4.8	24	102	NS
Endosulfan sulfate	2.4[2]	4.8	24	200	NS
Endrin	0.014	0.06	0.06	0.06	0.014
Heptachlor	0.042	0.38	0.38	0.38	0.14
Lindane	0.1	0.1	0.1	0.1	6
Polychlorinated biphenyls	0.1	1	1	1	1

ii. be free of extraneous debris or solid waste;

iii. be recognizable soil or other unregulated material as set forth in 6 NYCRR Part 360 and materials for which DEC has issued a beneficial use determination, which comply with the requirements of paragraph 2 below;

iv. not exceed the allowable constituent levels for imported fill or soil as described in paragraph 2 below, unless a site-specific exemption is provided by DER in accordance with paragraph 8 below; and

v. be tested as described in paragraph 3 below.

2. The fill material should not exceed the allowable constituent levels for imported fill or soil for the use of the site which are provided in Appendix 5, taking consideration that where the protection of ecological resources SCO is required for the site, the protection of ecological resources SCO must also be considered in selecting the lowest of the applicable SCGs. Where a compound is detected which is not on the Appendix 5 table the remedial party should:

i. determine if the constituent of concern is included on the supplemental soil cleanup objective tables in CP-Soil and if so use the CP-Soil values as the allowable constituent level; or

ii. consult with DER to determine an allowable constituent level.

3. Sampling is required for all imported soil for use as backfill or cover material. Sampling frequency of the material will be determined by the remedial design or remedial action work plan:

i. considering Table 5.4(e)10 and paragraph 10 below, and sampling will be performed consistent with sections 2.1 through 2.3;

ii. with a minimum one sample analyzed from every new source, at the following sampling frequency for:

(1) soil or sand imported from a virgin mine/pit, at least one round of characterization samples for the initial 100 cubic yards of material, in accordance with Table 5.4(e)10 below;

(2) material sources other than a virgin mine/pit (e.g., a former manufacturing site), in accordance with Table 5.4(e)10; or

(3) sites where large amounts of cover material/backfill are required, the sampling frequency can be reduced from that specified in Table 5.4(e)10 once a trend of compliance is established; and

iii. the DER project manager may modify the number of samples required by subparagraph ii above based on the site being remediated and the source of the material, in accordance with the modification provisions set forth in section 1.6.

4. Reuse of soil from the site. Soil originating on the site may be reused on the site or exported for reuse provided sampling demonstrates compliance with SCGs as detailed in Table 5.4(e)4. Soil which is not going off-site for reuse will be disposed in a permitted treatment, storage or disposal facility, unless paragraph 10 below provides for such export.

Table 5.4(e)4 Reuse of Soil [for Paragraph 5.4(e)4]		
Soil on the Site Meets:	**Reuse on the Site:**	**Off-site Export & Reuse:**
Unrestricted Soil SCGs	Without restrictions	Without restrictions
Meets the Applicable Use-based and Groundwater Protection SCG and where Appropriate Protection of Ecological Resources Soil SCGs for a Site w/ an IC & SMP.	In the soil cover/cap or as backfill within the area of the site subject to the IC.	Not Allowed, unless going to a site with IC subject to a 6 NYCRR Part 360 Beneficial Use Determination (BUD).
Meets Site-Specific Background Soil Levels.	Without restrictions. (Does not apply to sites in the BCP.)	Not Allowed, unless going to a site with IC subject to a 6 NYCRR Part 360 BUD.
Site-specific cleanup goals for subsurface soil	Placement below the soil cover/cap within the area of the site subject to the IC.	Not Allowed, unless going to a site with IC subject to a 6 NYCRR Part 360 BUD.

5. Material other than soil imported to a site. The following material may be imported, without chemical testing, to be used as backfill beneath pavement, buildings or as part of the final site cover, provided that it contains less than 10% by weight material which would pass through a size 80 sieve and consists of:

i. gravel, rock or stone, consisting of virgin material from a permitted mine or quarry; or

ii. recycled concrete or brick from a DEC registered construction and demolition debris processing facility if the material conforms to the requirements of Section 304 of the New York State Department of Transportation *Standard Specifications Construction and Materials Volume 1* (2002).

6. The remedial party must provide documentation of the source of fill to DER for approval of the source of the material before it is used on the site, which should include:

i. the name of the person providing the documentation and relationship to the source of the fill;

ii. the location where the fill was obtained;

iii. identification of any state or local approvals as a fill source; and

iv. if no prior approval is available for the source, a brief history of the use of the property which is the source of the fill.

7. Bills of lading should be provided to DER to document that the fill delivered was from a DER-approved source(s).

8. For all remedial programs except those developed pursuant to the BCP, DEC may issue a

site-specific exemption for one or more of the requirements set forth in this section, based upon site-specific conditions, such as:

i. use and redevelopment of the site;

ii. depth of the placement of the backfill material relative to the surface or subsurface structures;

iii. depth of the placement of the backfill material relative to groundwater;

iv. volume of backfill material;

v. potential for odor from the backfill material;

vi. presence of historic fill in the vicinity of the site;

vii. DEC-issued beneficial use determination, pursuant to 6 NYCRR Part 360; or

viii. background levels of contamination in areas surrounding the site.

9. For remedial programs pursuant to the BCP, DEC can only provide a site-specific exemption for backfill consistent with the provisions of paragraph 8 above as follows:

i. for Track 2 and Track 3 cleanups, for soils greater than 15 feet below ground surface; or

ii. for Track 4 cleanups, for soils beneath buildings, pavement and other improvements or for soils beneath the soil cover system or soil cap over exposed surface soils.

10. Sampling fill imported to or exported from a site. The remedial party will sample and analyze the fill being imported to the site in accordance with this subdivision and Table 5.4(e)10. Samples of the fill will be collected based on the soil quantity and type of constituents identified in the table and will be a combination of discrete and composite samples, handled as follows:

i. for VOCs only, grab samples are allowed. These grab samples are one or more discrete samples taken from the fill, with the number as specified in the volatile column of Table 5.4(e)10 for the soil quantity in question, and analyzed for the VOCs identified in Appendix 5; or

ii. for SVOCs, inorganics and PCBs/pesticides:

(1) one or more composite samples are collected from the volume of soil identified in Table 5.4(e)10 for analysis, with each composite from a different location in the fill volume;

(2) each composite is prepared by collecting discrete samples from 3 to 5 random locations from the volume of soil to be tested; and

(3) the discrete samples are mixed, and after mixing, a sample of the mixture is analyzed for the SVOCs, inorganic and PCBs/pesticide constituents identified in Appendix 5.

Table 5.4(e)10 Recommended Number of Soil Samples for Soil Imported To or Exported From a Site			
Contaminant	**VOCs**	**SVOCs, Inorganics & PCBs/Pesticides**	
Soil Quantity (cubic yards)	**Discrete Samples**	**Composite**	**Discrete Samples/Composite**
0-50	1	1	3-5 discrete samples from different locations in the fill being provided will comprise a composite sample for analysis
50-100	2	1	
100-200	3	1	
200-300	4	1	
300-400	4	2	
400-500	5	2	
500-800	6	2	
800-1000	7	2	
➢ 1000	Add an additional 2 VOC and 1 composite for each additional 1000 Cubic yards or consult with DER		

(f) Compliance for soil exported from a site for reuse. For soil that is being exported from a site to locations other than permitted disposal facilities, the handling requirements are set forth in this subdivision and in paragraph 5.4(e)4.

1. Levels of contamination must not exceed the lower of the groundwater and residential use levels as shown in Appendix 5, absent a beneficial use determination issued by DEC. DER will coordinate with the Division of Solid & Hazardous Materials (DSHM), prior to the start of the remedial action, relative to whether the exported soil can be used beneficially in accordance with 6 NYCRR 360-1. The sampling and analysis requirements are set forth in paragraph 5.4(e)10.

2. The number of required samples are specified in Table 5.4(e)10 and paragraph (e)10 above, which may be modified by the DER project manager based on various factors, including the location of the site receiving the soil.

(g) Compliance for the decommissioning of monitoring wells. All monitoring wells not required for site management should be decommissioned in accordance with paragraph (d)6 above prior to DER approval of the FER.

~~**5.5 Underground Storage Tank Closure**~~

~~(a) The first step for underground storage tank (UST) closure is the identification, removal, treatment, containment and/or stabilization of the contents to prevent contaminant exposure to receptors and to prevent further movement of contaminants through any pathway as set forth herein.~~

~~1. A health and safety plan for the site is developed, as described in section 1.9, by a qualified individual in accordance with subparagraph 1.5(a)3.i.~~

~~2. Underground tank closures not performed in accordance with this section will require a certification of the closure report by a professional engineer, as described in section 1.5.~~

Constituent	Unrestricted Use	Residential Use	Restricted Residential Use	Commercial or Industrial Use	If Ecological Resources are Present
Semi-volatile Organic Compounds					
Acenaphthene	20	98	98	98	20
Acenaphthylene	100	100	100	107	NS
Anthracene	100	100	100	500	NS
Benzo(a)anthracene	1	1	1	1	NS
Benzo(a)pyrene	1	1	1	1	2.6
Benzo(b)fluoranthene	1	1	1	1.7	NS
Benzo(g,h,i)perylene	100	100	100	500	NS
Benzo(k)fluoranthene	0.8	1	1.7	1.7	NS
Chrysene	1	1	1	1	NS
Dibenz(a,h)anthracene	0.33 [3]	0.33 [3]	0.33 [3]	0.56	NS
Fluoranthene	100	100	100	500	NS
Fluorene	30	100	100	386	30
Indeno(1,2,3-cd)pyrene	0.5	0.5	0.5	5.6	NS
m-Cresol(s)	0.33 [3]	0.33 [3]	0.33 [3]	0.33 [3]	NS
Naphthalene	12	12	12	12	NS
o-Cresol(s)	0.33 [3]	0.33 [3]	0.33 [3]	0.33 [3]	NS
p-Cresol(s)	0.33	0.33	0.33	0.33	NS
Pentachlorophenol	0.8 [3]	0.8 [3]	0.8 [3]	0.8 [3]	0.8 [3]
Phenanthrene	100	100	100	500	NS
Phenol	0.33 [3]	0.33 [3]	0.33 [3]	0.33 [3]	30
Pyrene	100	100	100	500	NS
Volatile Organic Compounds					
1,1,1-Trichloroethane	0.68	0.68	0.68	0.68	NS
1,1-Dichloroethane	0.27	0.27	0.27	0.27	NS
1,1-Dichloroethene	0.33	0.33	0.33	0.33	NS
1,2-Dichlorobenzene	1.1	1.1	1.1	1.1	NS
1,2-Dichloroethane	0.02	0.02	0.02	0.02	10
1,2-Dichloroethene(cis)	0.25	0.25	0.25	0.25	NS
1,2-Dichloroethene(trans)	0.19	0.19	0.19	0.19	NS
1,3-Dichlorobenzene	2.4	2.4	2.4	2.4	NS
1,4-Dichlorobenzene	1.8	1.8	1.8	1.8	20
1,4-Dioxane	0.1 [3]	0.1 [3]	0.1 [3]	0.1 [3]	0.1
Acetone	0.05	0.05	0.05	0.05	2.2
Benzene	0.06	0.06	0.06	0.06	70
Butylbenzene	12	12	12	12	NS
Carbon tetrachloride	0.76	0.76	0.76	0.76	NS
Chlorobenzene	1.1	1.1	1.1	1.1	40
Chloroform	0.37	0.37	0.37	0.37	12
Ethylbenzene	1	1	1	1	NS
Hexachlorobenzene	0.33 [3]	0.33 [3]	1.2	3.2	NS
Methyl ethyl ketone	0.12	0.12	0.12	0.12	100
Methyl tert-butyl ether	0.93	0.93	0.93	0.93	NS
Methylene chloride	0.05	0.05	0.05	0.05	12

Volatile Organic Compounds (continued)					
Propylbenzene-n	3.9	3.9	3.9	3.9	NS
Sec-Butylbenzene	11	11	11	11	NS
Tert-Butylbenzene	5.9	5.9	5.9	5.9	NS
Tetrachloroethene	1.3	1.3	1.3	1.3	2
Toluene	0.7	0.7	0.7	0.7	36
Trichloroethene	0.47	0.47	0.47	0.47	2
Trimethylbenzene-1,2,4	3.6	3.6	3.6	3.6	NS
Trimethylbenzene-1,3,5	8.4	8.4	8.4	8.4	NS
Vinyl chloride	0.02	0.02	0.02	0.02	NS
Xylene (mixed)	0.26	1.6	1.6	1.6	0.26

All concentrations are in parts per million (ppm)
NS = Not Specified

Footnotes:
[1] The SCO for Hexavalent or Trivalent Chromium is considered to be met if the analysis for the total species of this contaminant is below the specific SCO for Hexavalent Chromium.
[2] The SCO is the sum of endosulfan I, endosulfan II and endosulfan sulfate.
[3] For constituents where the calculated SCO was lower than the contract required quantitation limit (CRQL), the CRQL is used as the Track 1 SCO value.
[4] This SCO is derived from data on mixed isomers of BHC.

(b) Restricted use soil cleanup objectives.

Table 375-6.8(b): Restricted Use Soil Cleanup Objectives

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
Metals							
Arsenic	7440-38-2	16[f]	16[f]	16[f]	16[f]	13[f]	16[f]
Barium	7440-39-3	350[f]	400	400	10,000 [d]	433	820
Beryllium	7440-41-7	14	72	590	2,700	10	47
Cadmium	7440-43-9	2.5[f]	4.3	9.3	60	4	7.5
Chromium, hexavalent [h]	18540-29-9	22	110	400	800	1[e]	19
Chromium, trivalent [h]	16065-83-1	36	180	1,500	6,800	41	NS
Copper	7440-50-8	270	270	270	10,000 [d]	50	1,720
Total Cyanide [h]		27	27	27	10,000 [d]	NS	40
Lead	7439-92-1	400	400	1,000	3,900	63[f]	450
Manganese	7439-96-5	2,000[f]	2,000[f]	10,000 [d]	10,000 [d]	1600[f]	2,000[f]
Total Mercury		0.81[j]	0.81[j]	2.8[j]	5.7[j]	0.18[f]	0.73
Nickel	7440-02-0	140	310	310	10,000 [d]	30	130
Selenium	7782-49-2	36	180	1,500	6,800	3.9[f]	4[f]
Silver	7440-22-4	36	180	1,500	6,800	2	8.3
Zinc	7440-66-6	2200	10,000 [d]	10,000 [d]	10,000 [d]	109[f]	2,480
PCBs/Pesticides							
2,4,5-TP Acid (Silvex)	93-72-1	58	100[a]	500[b]	1,000[c]	NS	3.8
4,4'-DDE	72-55-9	1.8	8.9	62	120	0.0033 [e]	17
4,4'-DDT	50-29-3	1.7	7.9	47	94	0.0033 [e]	136
4,4'- DDD	72-54-8	2.6	13	92	180	0.0033 [e]	14
Aldrin	309-00-2	0.019	0.097	0.68	1.4	0.14	0.19
alpha-BHC	319-84-6	0.097	0.48	3.4	6.8	0.04[g]	0.02
beta-BHC	319-85-7	0.072	0.36	3	14	0.6	0.09
Chlordane (alpha)	5103-71-9	0.91	4.2	24	47	1.3	2.9

Table 375-6.8(b): Restricted Use Soil Cleanup Objectives

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
delta-BHC	319-86-8	100[a]	100[a]	500[b]	1,000[c]	0.04[g]	0.25
Dibenzofuran	132-64-9	14	59	350	1,000[c]	NS	210
Dieldrin	60-57-1	0.039	0.2	1.4	2.8	0.006	0.1
Endosulfan I	959-98-8	4.8[i]	24[i]	200[i]	920[i]	NS	102
Endosulfan II	33213-65-9	4.8[i]	24[i]	200[i]	920[i]	NS	102
Endosulfan sulfate	1031-07-8	4.8[i]	24[i]	200[i]	920[i]	NS	1,000[c]
Endrin	72-20-8	2.2	11	89	410	0.014	0.06
Heptachlor	76-44-8	0.42	2.1	15	29	0.14	0.38
Lindane	58-89-9	0.28	1.3	9.2	23	6	0.1
Polychlorinated biphenyls	1336-36-3	1	1	1	25	1	3.2
Semivolatiles		NOTE: In the case of PCBs a site specific SCO of 10 ppm was used					
Acenaphthene	83-32-9	100[a]	100[a]	500[b]	1,000[c]	20	98
Acenapthylene	208-96-8	100[a]	100[a]	500[b]	1,000[c]	NS	107
Anthracene	120-12-7	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Benz(a)anthracene	56-55-3	1[f]	1[f]	5.6	11	NS	1[f]
Benzo(a)pyrene	50-32-8	1[f]	1[f]	1[f]	1.1	2.6	22
Benzo(b)fluoranthene	205-99-2	1[f]	1[f]	5.6	11	NS	1.7
Benzo(g,h,i)perylene	191-24-2	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Benzo(k)fluoranthene	207-08-9	1	3.9	56	110	NS	1.7
Chrysene	218-01-9	1[f]	3.9	56	110	NS	1[f]
Dibenz(a,h)anthracene	53-70-3	0.33[e]	0.33[e]	0.56	1.1	NS	1,000[c]
Fluoranthene	206-44-0	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Fluorene	86-73-7	100[a]	100[a]	500[b]	1,000[c]	30	386
Indeno(1,2,3-cd)pyrene	193-39-5	0.5[f]	0.5[f]	5.6	11	NS	8.2
m-Cresol	108-39-4	100[a]	100[a]	500[b]	1,000[c]	NS	0.33[e]
Naphthalene	91-20-3	100[a]	100[a]	500[b]	1,000[c]	NS	12

Table 375-6.8(b): Restricted Use Soil Cleanup Objectives

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
o-Cresol	95-48-7	100[a]	100[a]	500[b]	1,000[c]	NS	0.33[e]
p-Cresol	106-44-5	34	100[a]	500[b]	1,000[c]	NS	0.33[e]
Pentachlorophenol	87-86-5	2.4	6.7	6.7	55	0.8[e]	0.8[e]
Phenanthrene	85-01-8	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Phenol	108-95-2	100[a]	100[a]	500[b]	1,000[c]	30	0.33[e]
Pyrene	129-00-0	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Volatiles							
1,1,1-Trichloroethane	71-55-6	100[a]	100[a]	500[b]	1,000[c]	NS	0.68
1,1-Dichloroethane	75-34-3	19	26	240	480	NS	0.27
1,1-Dichloroethene	75-35-4	100[a]	100[a]	500[b]	1,000[c]	NS	0.33
1,2-Dichlorobenzene	95-50-1	100[a]	100[a]	500[b]	1,000[c]	NS	1.1
1,2-Dichloroethane	107-06-2	2.3	3.1	30	60	10	0.02[f]
cis-1,2-Dichloroethene	156-59-2	59	100[a]	500[b]	1,000[c]	NS	0.25
trans-1,2-Dichloroethene	156-60-5	100[a]	100[a]	500[b]	1,000[c]	NS	0.19
1,3-Dichlorobenzene	541-73-1	17	49	280	560	NS	2.4
1,4-Dichlorobenzene	106-46-7	9.8	13	130	250	20	1.8
1,4-Dioxane	123-91-1	9.8	13	130	250	0.1[e]	0.1[e]
Acetone	67-64-1	100[a]	100[b]	500[b]	1,000[c]	2.2	0.05
Benzene	71-43-2	2.9	4.8	44	89	70	0.06
Butylbenzene	104-51-8	100[a]	100[a]	500[b]	1,000[c]	NS	12
Carbon tetrachloride	56-23-5	1.4	2.4	22	44	NS	0.76
Chlorobenzene	108-90-7	100[a]	100[a]	500[b]	1,000[c]	40	1.1
Chloroform	67-66-3	10	49	350	700	12	0.37
Ethylbenzene	100-41-4	30	41	390	780	NS	1
Hexachlorobenzene	118-74-1	0.33[e]	1.2	6	12	NS	3.2
Methyl ethyl ketone	78-93-3	100[a]	100[a]	500[b]	1,000[c]	100[a]	0.12

Table 375-6.8(b): Restricted Use Soil Cleanup Objectives

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
Methyl tert-butyl ether	1634-04-4	62	100[a]	500[b]	1,000[c]	NS	0.93
Methylene chloride	75-09-2	51	100[a]	500[b]	1,000[c]	12	0.05
n-Propylbenzene	103-65-1	100[a]	100[a]	500[b]	1,000[c]	NS	3.9
sec-Butylbenzene	135-98-8	100[a]	100[a]	500[b]	1,000[c]	NS	11
tert-Butylbenzene	98-06-6	100[a]	100[a]	500[b]	1,000[c]	NS	5.9
Tetrachloroethene	127-18-4	5.5	19	150	300	2	1.3
Toluene	108-88-3	100[a]	100[a]	500[b]	1,000[c]	36	0.7
Trichloroethene	79-01-6	10	21	200	400	2	0.47
1,2,4-Trimethylbenzene	95-63-6	47	52	190	380	NS	3.6
1,3,5- Trimethylbenzene	108-67-8	47	52	190	380	NS	8.4
Vinyl chloride	75-01-4	0.21	0.9	13	27	NS	0.02
Xylene (mixed)	1330-20-7	100[a]	100[a]	500[b]	1,000[c]	0.26	1.6

All soil cleanup objectives (SCOs) are in parts per million (ppm).
NS=Not specified. See Technical Support Document (TSD).

Footnotes

[a] The SCOs for residential, restricted-residential and ecological resources use were capped at a maximum value of 100 ppm. See TSD section 9.3.

[b] The SCOs for commercial use were capped at a maximum value of 500 ppm. See TSD section 9.3.

[c] The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm. See TSD section 9.3.

[d] The SCOs for metals were capped at a maximum value of 10,000 ppm. See TSD section 9.3.

[e] For constituents where the calculated SCO was lower than the contract required quantitation limit (CRQL), the CRQL is used as the SCO value.

[f] For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department and Department of Health rural soil survey, the rural soil background concentration is used as the Track 2 SCO value for this use of the site.

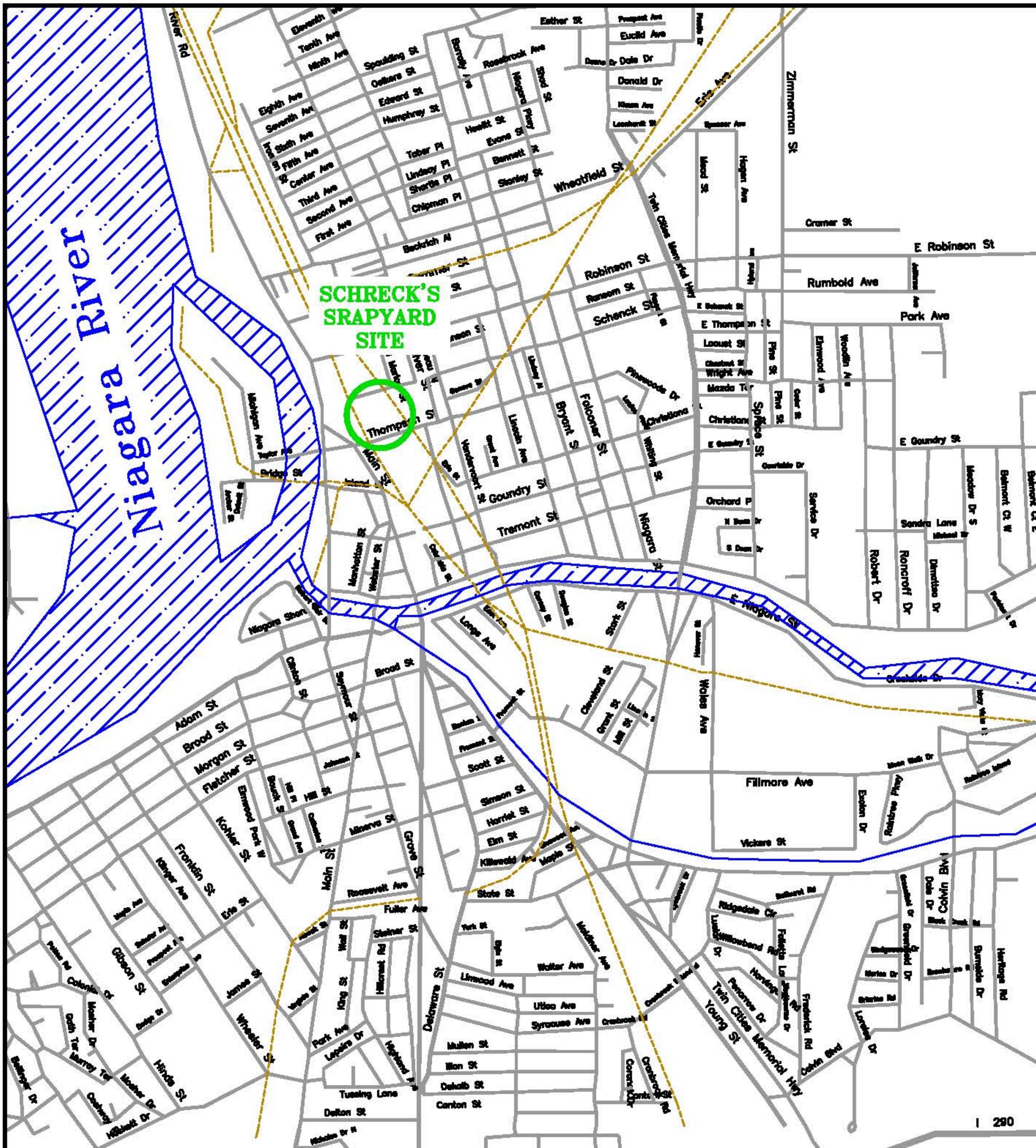
[g] This SCO is derived from data on mixed isomers of BHC.

[h] The SCO for this specific compound (or family of compounds) is considered to be met if the analysis for the total species of this contaminant is below the specific SCO.

[i] This SCO is for the sum of endosulfan I, endosulfan II, and endosulfan sulfate.

[j] This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts). See TSD Table 5.6-1.

FIGURES



Tonawanda East Quadrangle &

Tonawanda West Quadrangle

Scale Depends on Final Plotted Size

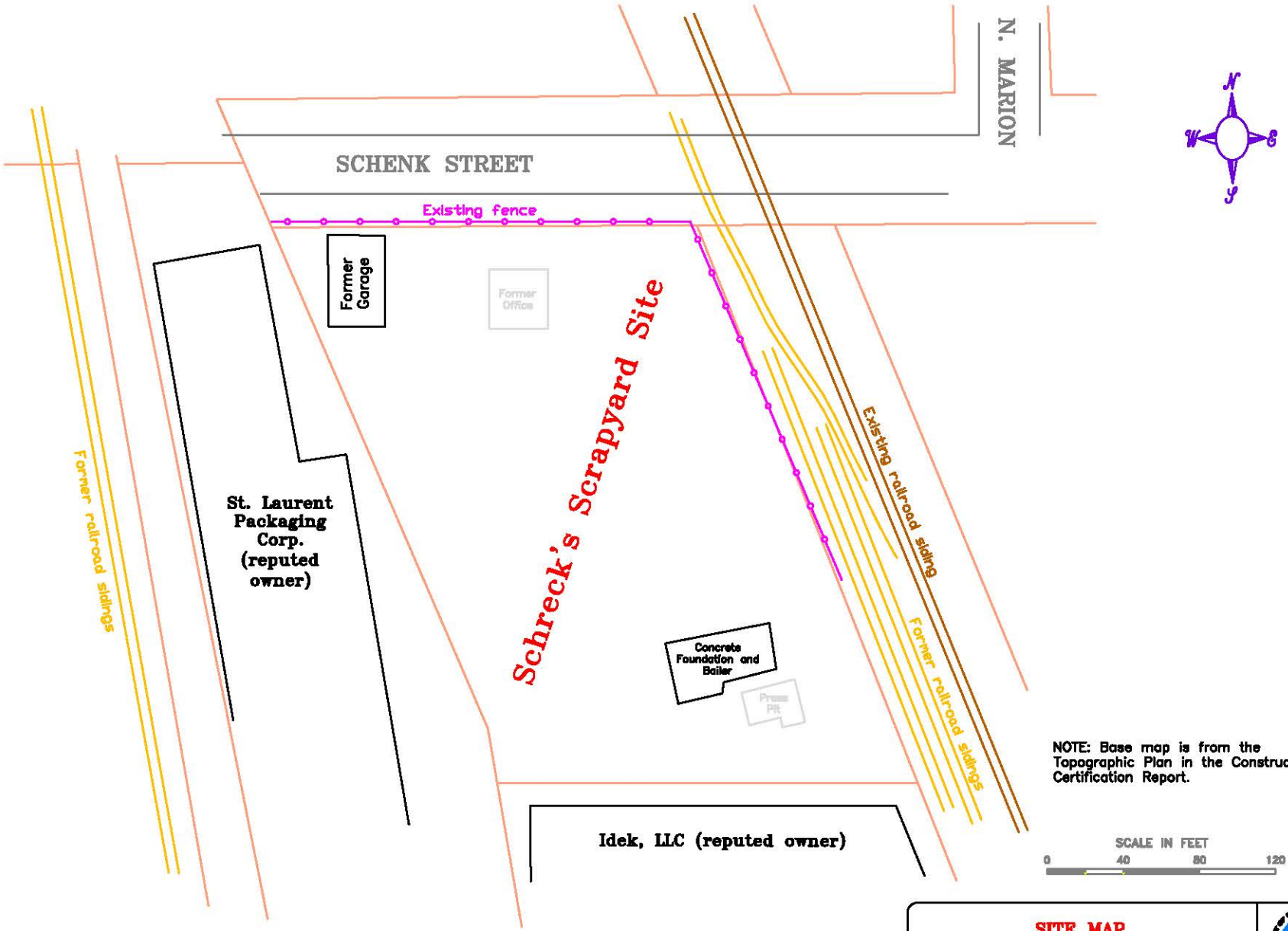
SITE LOCATION MAP

DIVISION OF ENVIRONMENTAL REMEDIATION

DATE: 03/28/08	DRAWING: Site Location Map.dwg

SITE: SCHRECK'S SCRAPYARD SITE

FIGURE 2-1

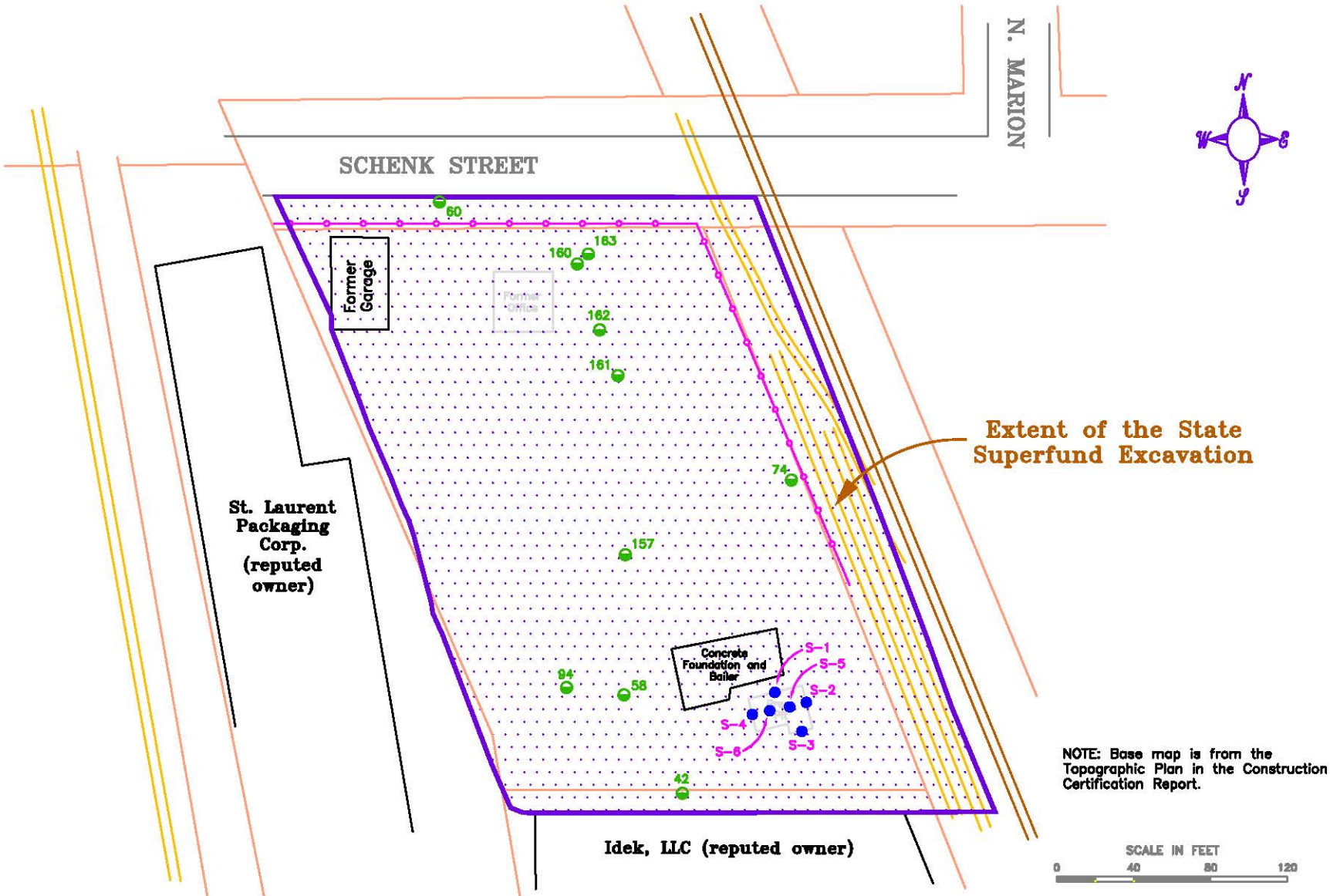


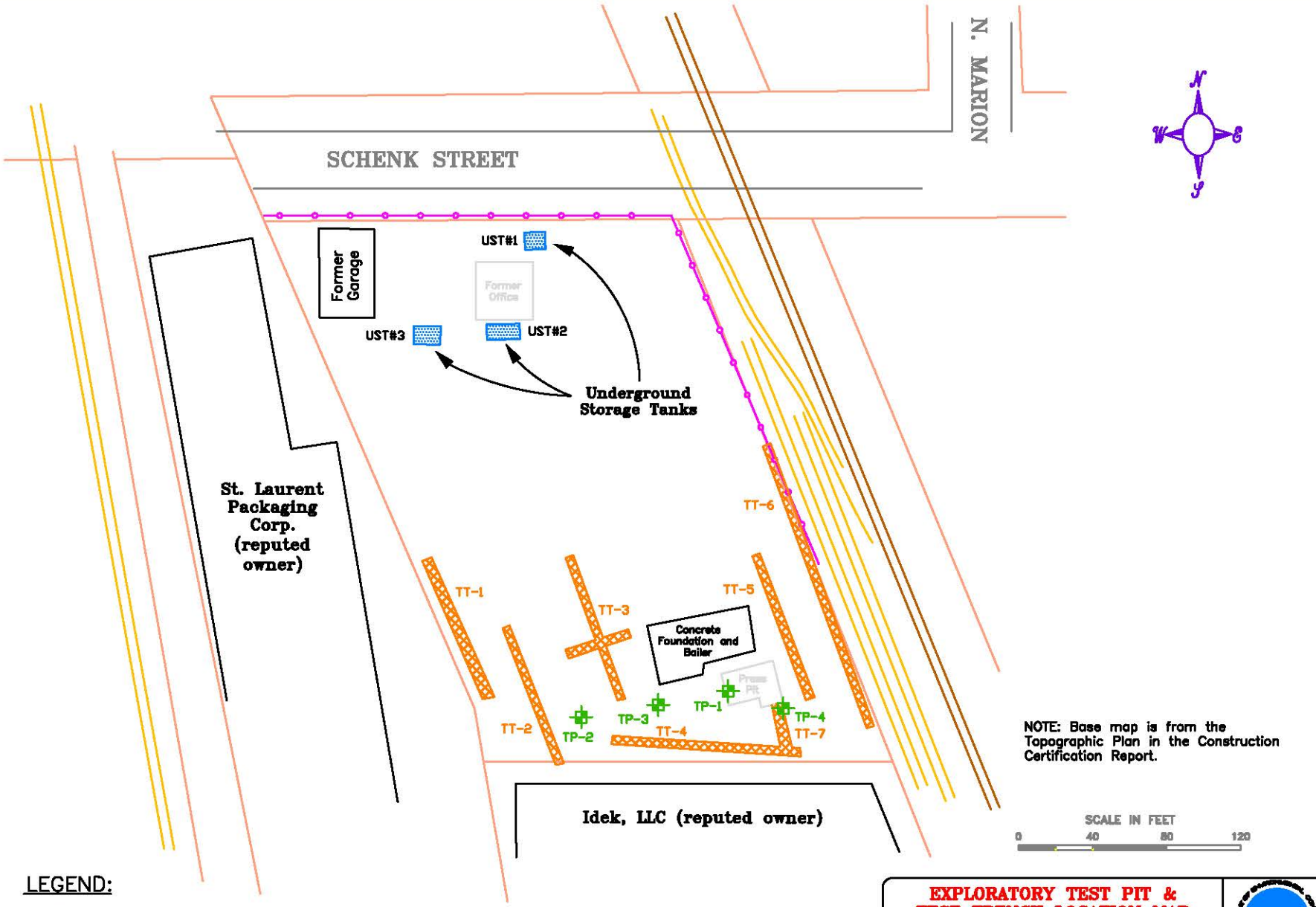
SITE MAP

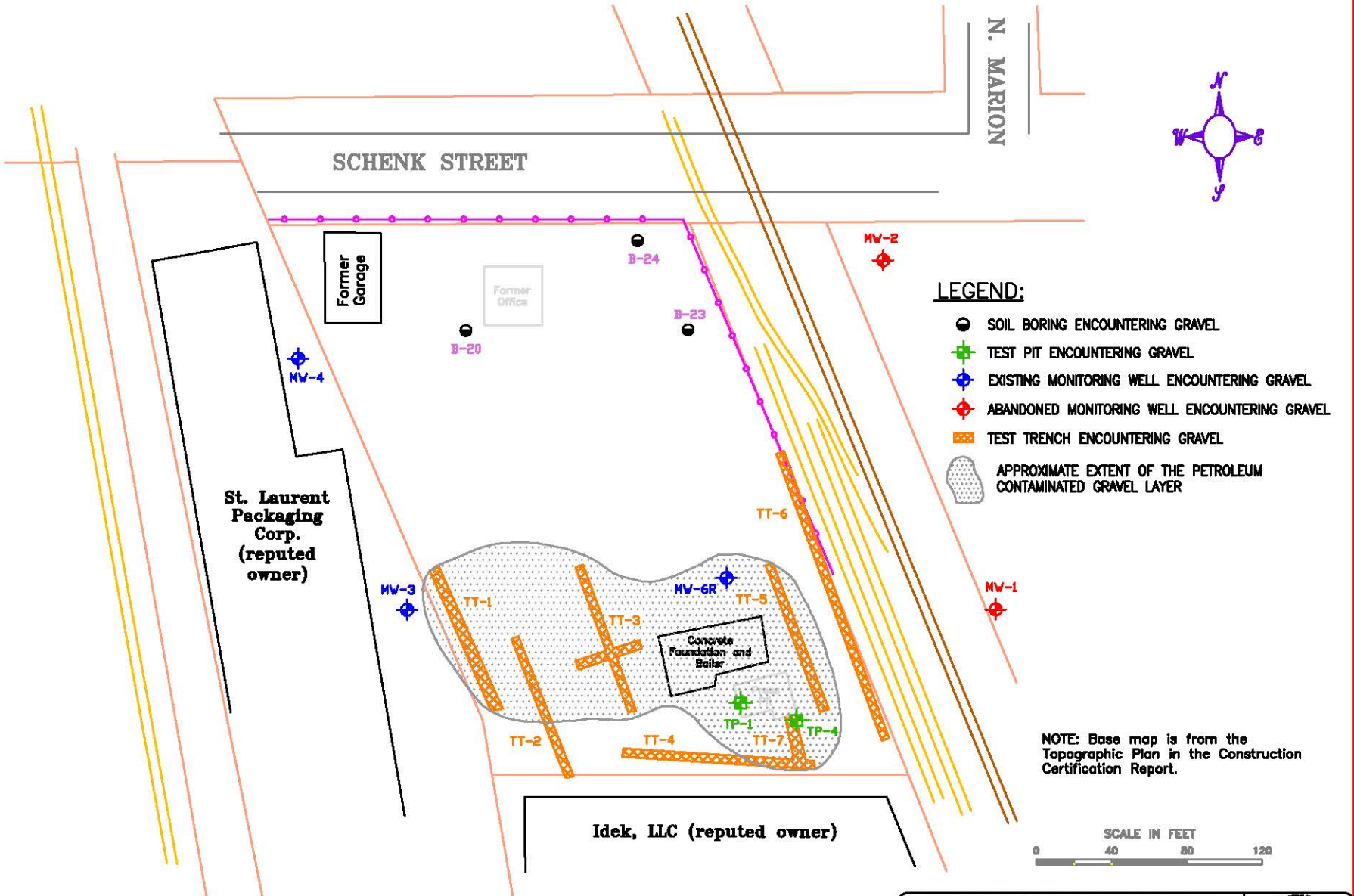
DIVISION OF ENVIRONMENTAL REMEDIATION

DATE 04/29/08 DRAWING Schreckn Site Map.dwg

SITE NAME SCHRECK'S SCRAPYARD SITE FIGURE 2-2


N. MARION
SCHENK STREET
N
W
E
S
60
160
163
162
161
74
157
94
58
42
Former Garage
Boiler Pits
Concrete Foundation and Boiler
S-1
S-5
S-2
S-4
S-6
S-3
Extent of the State Superfund Excavation
St. Laurent Packaging Corp. (reputed owner)
Idek, LLC (reputed owner)
NOTE: Base map is from the Topographic Plan in the Construction Certification Report.
SCALE IN FEET
0
40
80
120
LEGEND:
CONFIRMATORY SOIL SAMPLE (PRESS PIT REMEDIATION)
CONFIRMATORY SOIL SAMPLE (STATE SUPERFUND REMEDIATION)
CONFIRMATORY SAMPLE LOCATION MAP
DIVISION OF ENVIRONMENTAL REMEDIATION
DATE 04/29/08
DRAWING Schrecks Site Map.dwg
SITE NAME SCHRECK'S SCRAPYARD SITE
FIGURE 3-1


N. MARION
SCHENK STREET
N
W
E
S
Former Garage
Former Office
UST#1
UST#2
UST#3
Underground Storage Tanks
St. Laurent Packaging Corp. (reputed owner)
TT-1
TT-2
TT-3
TT-4
TT-5
TT-6
TT-7
TP-1
TP-2
TP-3
TP-4
Concrete Foundation and Bailer
Press Pit
Idek, LLC (reputed owner)
NOTE: Base map is from the Topographic Plan in the Construction Certification Report.
SCALE IN FEET
0
40
80
120
LEGEND:
EXPLORATORY TEST PIT LOCATION
EXPLORATORY TEST TRENCH LOCATION
EXPLORATORY TEST PIT & TEST TRENCH LOCATION MAP
DIVISION OF ENVIRONMENTAL REMEDIATION
DATE 04/29/08
DRAWING Schrecks Site Map.dwg
SITE NAME SCHRECK'S SCRAPYARD SITE
FIGURE 4-1

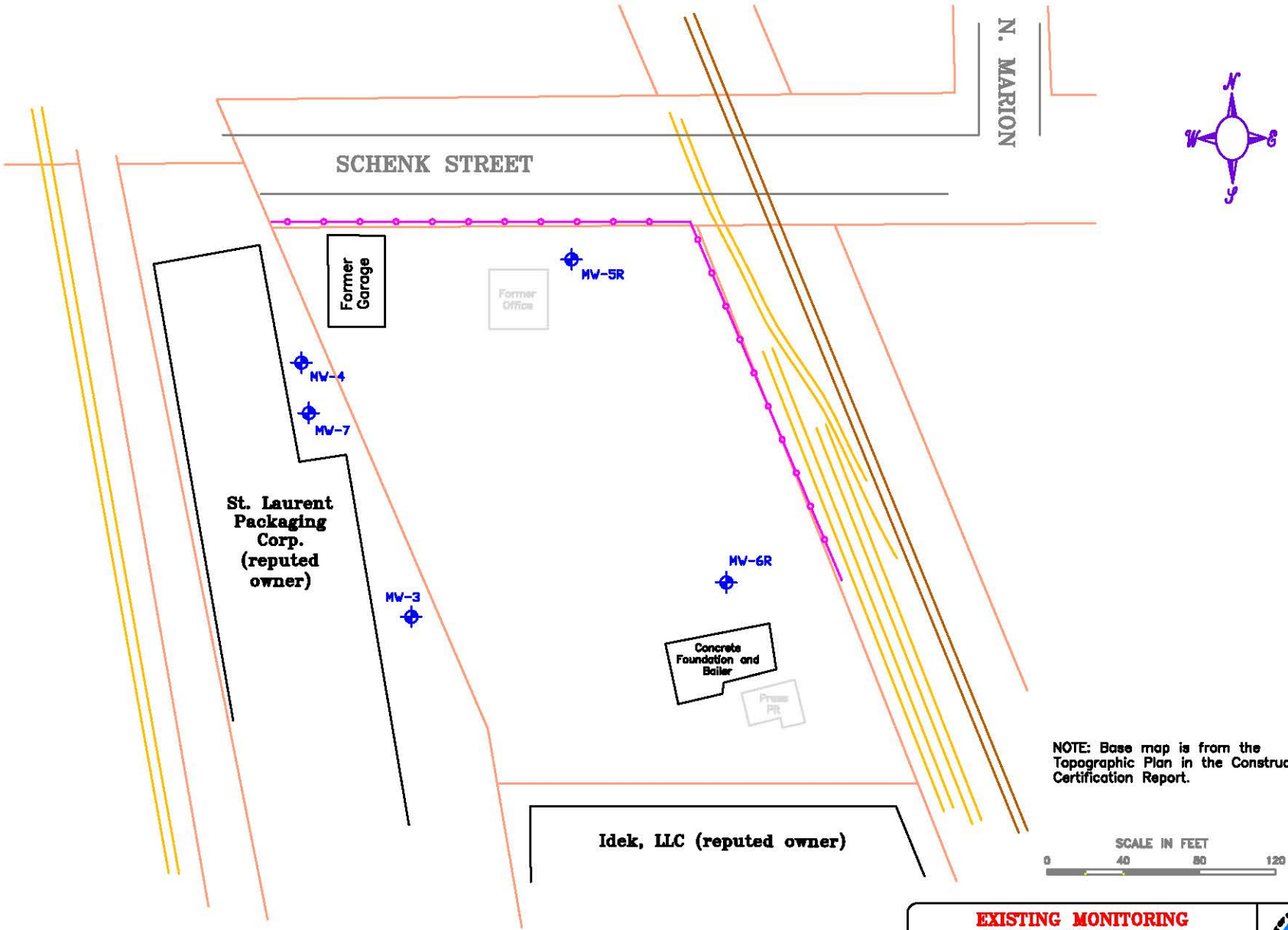


APPROXIMATE EXTENT OF THE CONTAMINATED GRAVEL LAYER

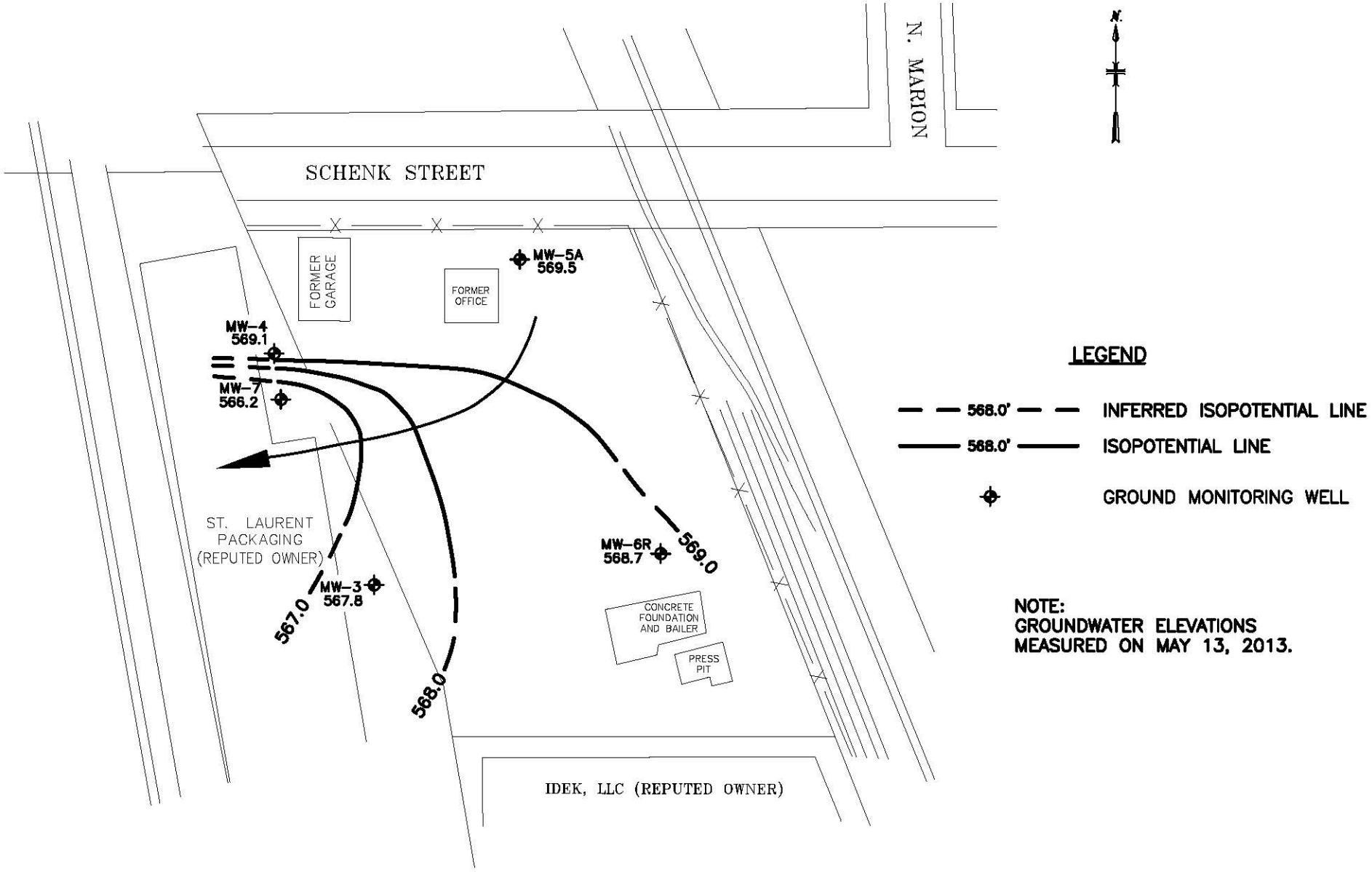
DIVISION OF ENVIRONMENTAL REMEDIATION

DATE 04/29/08 DRAWING Schreckn Site Map.dwg

SITE NAME SCHRECK'S SCRAPYARD SITE FIGURE 4-2


N. MARION
SCHENK STREET
N
W
E
S
Former Garage
Former Office
MW-5R
MW-4
MW-7
St. Laurent Packaging Corp. (reputed owner)
MW-3
MW-6R
Concrete Foundation and Bailer
Press Pit
Idek, LLC (reputed owner)
NOTE: Base map is from the Topographic Plan in the Construction Certification Report.
SCALE IN FEET
0
40
80
120
LEGEND:
EXISTING MONITORING WELL LOCATION
EXISTING MONITORING WELL LOCATION MAP
DIVISION OF ENVIRONMENTAL REMEDIATION
DATE 04/29/08
DRAWING Schrecks Site Map.dwg
SITE NAME SCHRECK'S SCRAPYARD SITE
FIGURE 5-1

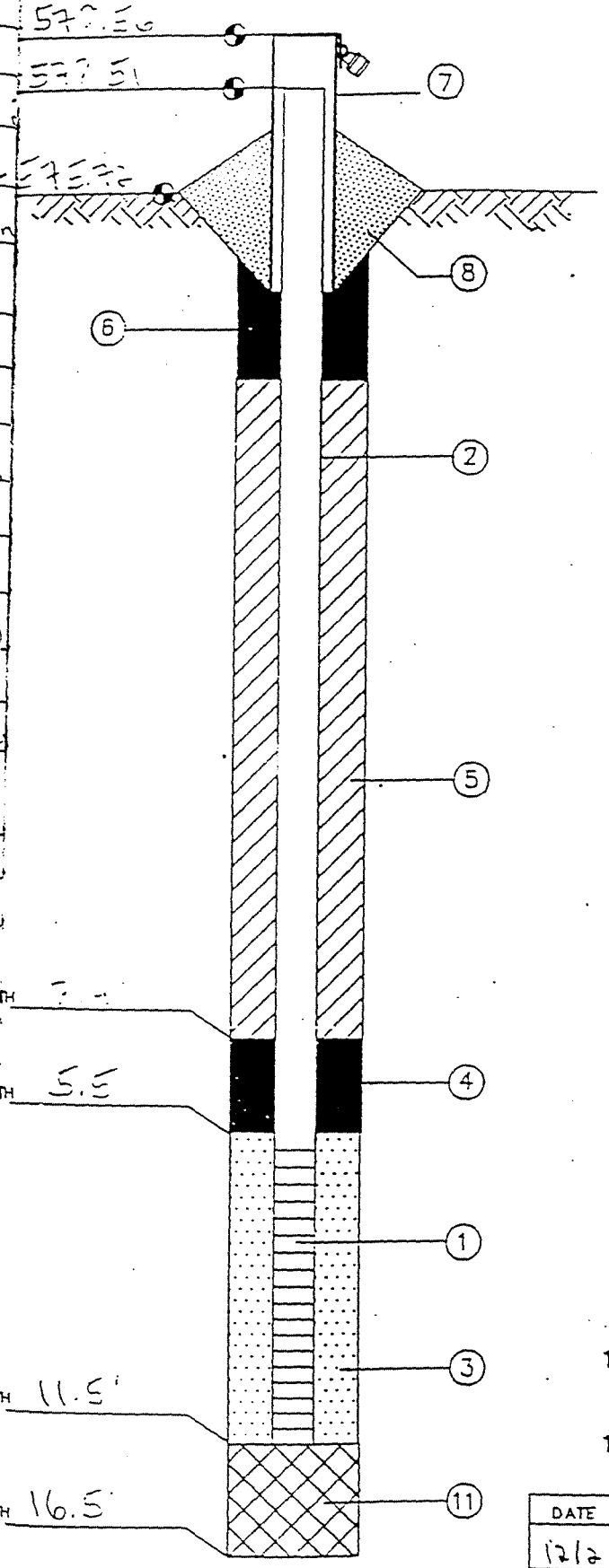
User: welshans Spec: PIRNIE STANDARD File: G:\Projects\4320031\CADD\4320FIG-4.DWG Scale: 1:1 Date: 05/20/2013 Time: 14:53 Layout: Layout1



ARCADIS	SCHRECK'S SCRAPYARD SITE PERIODIC GROUNDWATER MONITORING REPORT JUNE 2013	GROUNDWATER ISOPOTENTIAL MAP NOT TO SCALE	ARCADIS US, INC. JUNE 2013 FIGURE 6-1

Figure 7

ALL DEPTHS MEASURED FROM GROUND SURFACE



MONITORING WELL CONSTRUCTION INFORMATION

JOB No. 611-1 CLIENT NYEREC

LOCATION SCHRECKS LANDF.L

DATE 12/2/99 WELL No. MW-3

HYDROGEOLOGIST Nicholas Rocchia

DRILLING CONTRACTOR Wisc. Test Drilling

1.) SCREEN TYPE Stainless Steel

SLOTTED LENGTH 5.0 ft.

SLOT SIZE 0.010 inches

2.) SOLID PIPE TYPE Stainless Steel

SOLID PIPE LENGTH 10.' ft.

PIPE & SCREEN DIA. 2 in.

JOINT TYPE – SLIP/GLUED ____ THREADED ✓

3.) TYPE OF BACKFILL AROUND SCREEN

#2.0 Silica Sand (Approximately)

4.) TYPE OF LOWER SEAL (IF INSTALLED)

hydrated bentonite pellets

5.) TYPE OF BACKFILL cement

HOW INSTALLED poured

6.) TYPE OF SURFACE SEAL (IF INSTALLED)

Sacrete cement

7.) PROTECTIVE CASING – YES ✓ NO ____

LOCKING CAP YES ✓ NO ____

8.) CONCRETE SEAL – YES ✓ NO ____

9.) DRILLING METHOD hollow stem auger

10.) ADDITIVES USED (IF ANY) water for bentonite pellet hydration

11.) TYPE OF BACKFILL Natural cave-in fine sand

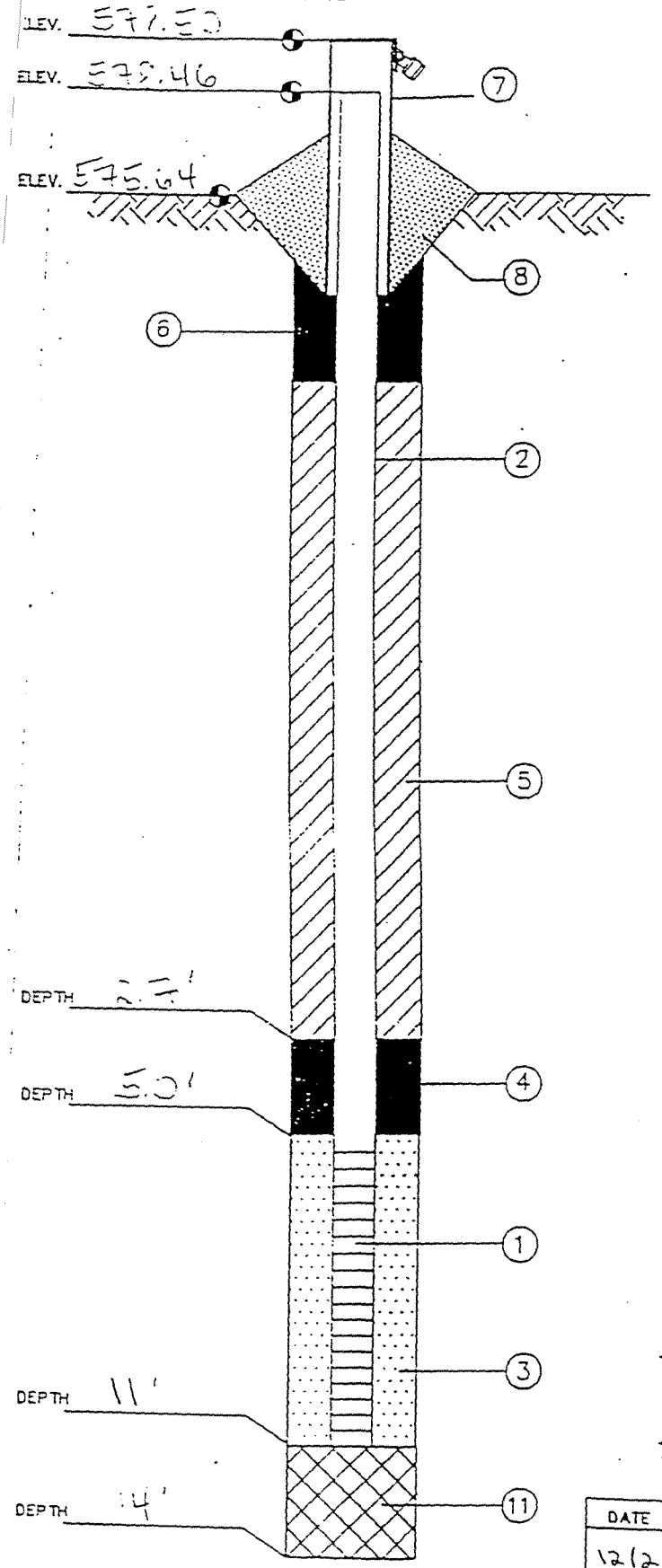
WATER LEVEL CHECKS *

DATE	TIME	DEPTH TO WATER	REMARKS
12/2	EOB	7.30	

* FROM TOP OF WELL CASING

Figure 8

ALL DEPTHS MEASURED FROM GROUND SURFACE



MONITORING WELL CONSTRUCTION INFORMATION

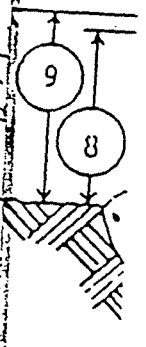
JOB No. 6[illegible]-1 CLIENT NYSEG

LOCATION SCHRECKS SCRAPYARD

DATE 12/7-188 WELL No. MW-4

HYDROGEOLOGIST Nicholas Fiacchia

DRILLING CONTRACTOR Wisc. Test Drilling



1.) SCREEN TYPE stainless steel

SLOTTED LENGTH 5.0

SLOT SIZE 0.010 inches

2.) SOLID PIPE TYPE stainless steel

SOLID PIPE LENGTH 10

PIPE & SCREEN DIA. 2

JOINT TYPE – SLIP/GLUED ____ THREADED

3.) TYPE OF BACKFILL AROUND SCREEN #30 silica sand (American M

4.) TYPE OF LOWER SEAL (IF INSTALLED) hydrated bentonite pellets

5.) TYPE OF BACKFILL concrete

HOW INSTALLED grout

6.) TYPE OF SURFACE SEAL (IF INSTALLED) Sacrete cement

7.) PROTECTIVE CASING – YES ✓ NO ____

LOCKING CAP YES ✓ NO ____

8.) CONCRETE SEAL – YES ✓ NO ____

9.) DRILLING METHOD hollow stem au

10.) ADDITIVES USED (IF ANY) water for bentonite pellet hydration

11.) TYPE OF BACKFILL natural cave-in

WATER LEVEL CHECKS *

DATE	TIME	DEPTH TO WATER	REMARKS
12/2	EOB	8.3	
12/5		8.5	

* FROM TOP OF WELL CASING

TECHNICAL DRILLING SERVICES

531 N. DAVIS RD.
ELMA, N.Y. 14059

HOLE NO. B-2 MW#5R
ELEV. _____

DRILLING LOG

MW#5R

Client ISI
Project Schrek Wrecking Yard Project No. 09421
Location Schenk Road, Tonowanda, N.Y.

Date: Started 7-5-94 Completed 7-5-94 Driller C Rengert
Sampler: Dia 2 ins. Type SS Hammer Wt. 140 lbs. Fall 30 ins.
Casing: Dia _____ ins. Type _____ Hammer Wt. _____ lbs. Fall _____ ins.
Water/Mud used in drilling Yes _____ No X Other _____

Page 1 Of 2 (well diagram)

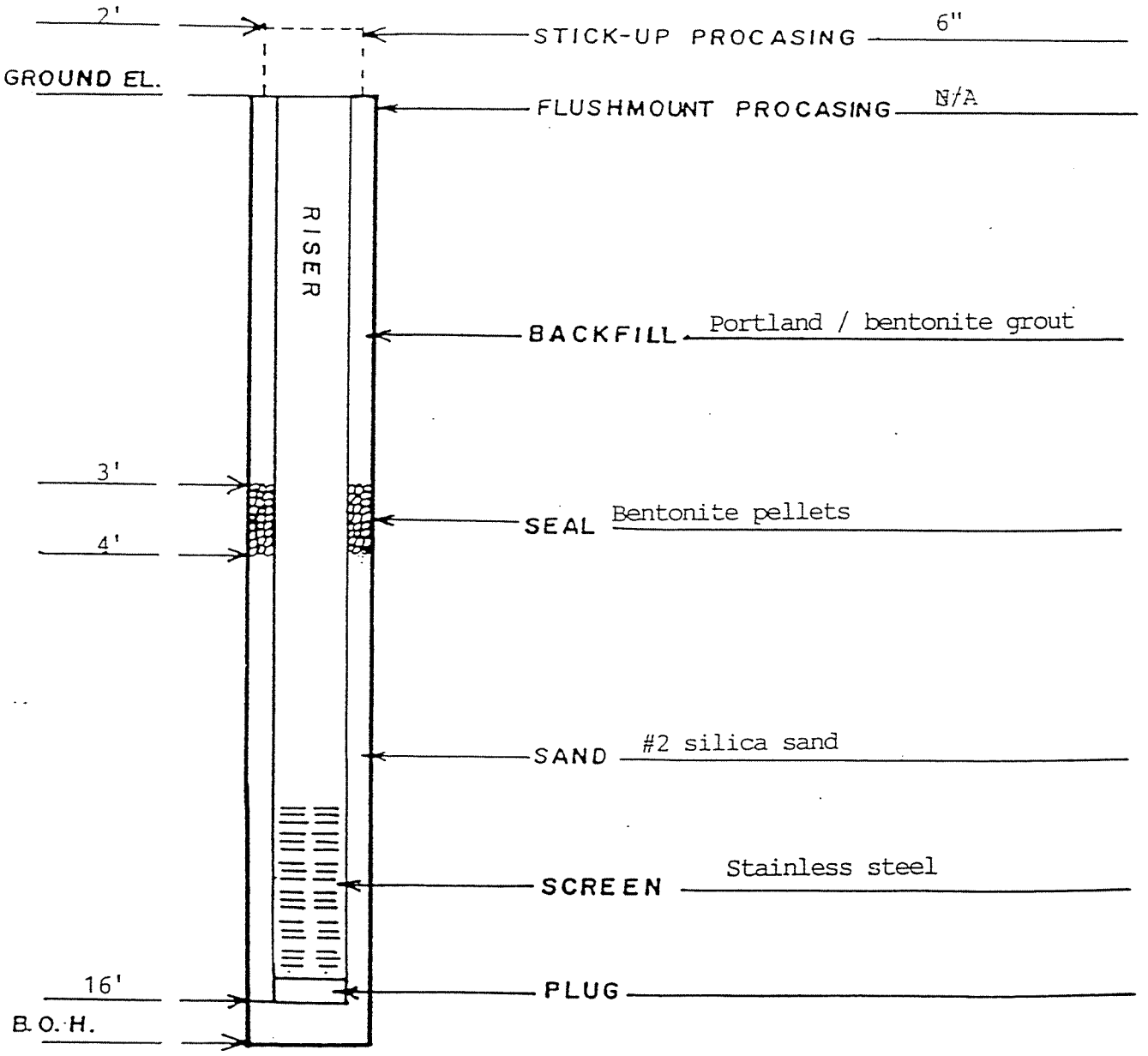
Depth (Ft.)	Material Description	Sample No	Sample Depth	Blows/0.5'	N	Rec (ft.)
4'	Very stiff, gray to black, silt and fine to very fine sand, moist	1	4-6	8-7-8-9	15	2
6.5'		2	6-8	10-22-22-20	44	1.5
	Dense, gray, coarse to fine sand, little silt, damp	3	8-10	4-7-8-8	15	1.3
8'		4	10-12	4-5-7-10	12	1.5
	Very stiff, brown, silt, some fine to very fine sand, wet	5	12-14	10-12-15-14	27	1.8
11'		6	14-16	4-5-6-7	11	1.7
	Stiff, brown, clayey silt, trace fine to very fine sand, moist					
	BOH 16'					

Water Depth: During Drilling _____ Ft.; Upon Compl. _____ Ft.; _____ Hrs. after Compl. _____ Ft.
Weather/Remarks: _____

TECHNICAL DRILLING SERVICES

Auger • Coring • Monitoring Wells
531 North Davis Road
Elma, New York 14059
(716) 652-7858

Client: ISI MW#5R — Start: July 5, 1994
Project No.: 09421 — Completed: July 5, 1994
Boring No.: B-2 S.S — Well: 2 "- Sch. 304



TECHNICAL DRILLING SERVICES

HOLE NO. B-1 MW#6R
ELEV. _____

531 N. DAVIS RD.
ELMA, N.Y. 14059

DRILLING LOG

MW#6R

Client ISI
Project Schrek Wrecking Yard Project No. 09421
Location Schenk Road, Tonowanda, New York

Date: Started 7-5-94 Completed 7-5-94 Driller C. Rengert
Sampler: Dia 2 ins. Type SS Hammer Wt. 140 lbs. Fall 30 ins.
Casing: Dia _____ ins. Type _____ Hammer Wt. _____ lbs. Fall _____ ins.
Water/Mud used in drilling Yes _____ No x Other _____

Page 1 of 2 (well diagram)

Depth (Ft.)	Material Description	Sample No	Sample Depth	Blows/0.5'	N	Rec (ft.)
0	Medium dense, brown, silt, little fine to very fine sand, trace fine gravel damp	1	0-2	13-14-10-8	24	1.6
		2	2-4	5-12-19-50/.4	50/.4	Ø
	cobbles @ 5'					
7'		3	4-6	5 4-6-6	10	1.6
	Very stiff, gray to brown, silt, little fine to very fine sand, wet	4	6-8	6-8-8-9	16	1.6
10.5'		5	8-10	5-2-2-5	4	2
	Loose, gray, fine gravel, some coarse to fine sand, little silt, saturated	6	10-12	5-4-4-7	8	2
11.6'		7	12-14	3-4-6-6	10	1.7
	Medium stiff, red brown, silt, little fine to very fine sand, trace fine gravel, moist	8	14-16	6-8-7-6	15	1.1
	BOH 16'					

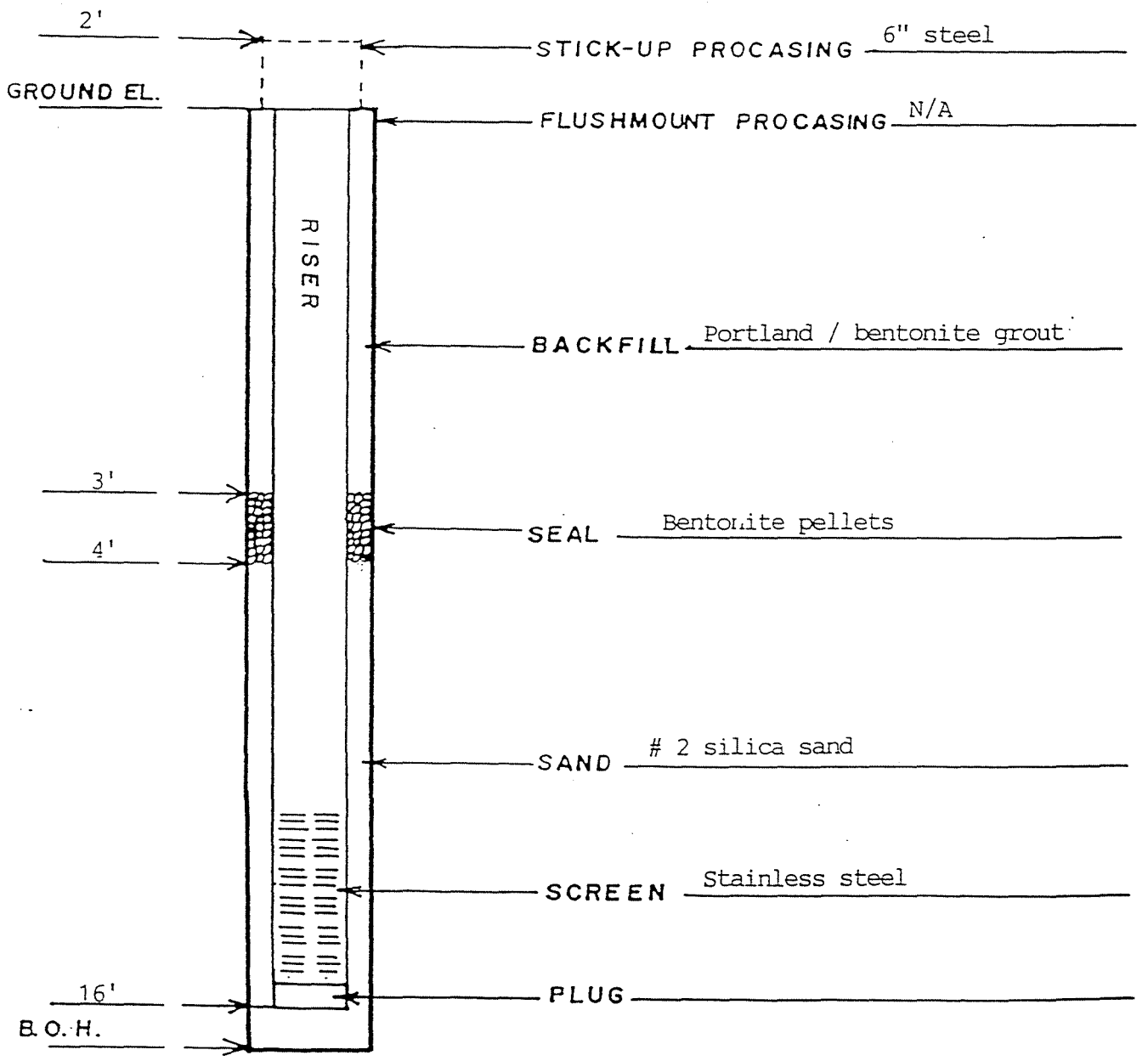
Water Depth: During Drilling _____ Ft.; Upon Compl. _____ Ft.; _____ Hrs. after Compl. _____ Ft.

Weather/Remarks: _____

TECHNICAL DRILLING SERVICES

Auger • Coring • Monitoring Wells
531 North Davis Road
Elma, New York 14059
(716) 652-7858

Client: ISI MW#6R — Start: July 5, 1994
Project No.: 09421 — Completed: July 5, 1994
Boring No.: B-1 — Well: "- Sch.



APPENDICIES

APPENDIX A – EXCAVATION WORK PLAN

INTRODUCTION

The Site owner and associated parties performing this work, are completely responsible for the safe performance of all intrusive work, the structural integrity of excavations, proper disposal of excavation water, control of runoff from open excavations into contaminated media, and for structures that may be affected by excavations (such as sheet piling and bridge foundations).

A-1 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to encounter contaminated media, the site owner or their representative will notify the Department. Currently, this notification will be made to:

Regional Hazardous Waste Remediation Engineer

270 Michigan Avenue, Buffalo, NY 14203-2999

(716) 851-7220

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact any part of the soil barrier,
- A summary of environmental conditions anticipated in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work,
- A summary of the applicable components of this EWP,

- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120,
- A copy of the contractor's health and safety plan (HASP), in electronic format,
- Identification of disposal facilities for potential waste streams,
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

A-2 SOIL SCREENING METHODS

Visual, olfactory and instrument-based soil screening will be performed by a qualified environmental professional during all remedial and development excavations into known or potentially contaminated media. Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal, material that requires testing, material that can be returned to the subsurface, and material that can be used as cover soil.

A-3 STOCKPILE METHODS

Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC.

A-4 MATERIALS EXCAVATION AND LOAD OUT

A qualified environmental professional or person under their supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The owner of the property and its contractors are solely responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash will be operated on-site. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

A-5 MATERIALS TRANSPORT OFF-SITE

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

A-6 MATERIALS DISPOSAL OFF-SITE

All soil/fill/solid waste excavated and removed from the site will be treated as contaminated and regulated material and will be transported and disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

A-7 MATERIALS REUSE ON-SITE

Excavated material may be reused at the same location from which it was removed unless it exhibits signs of gross contamination. Assuming no signs of gross contamination, no laboratory analyses are required provided the material is placed back into the bottom of the excavation. Excavated material which is not reused at the same location shall be disposed off-site in accordance with the procedures described in Section A-6 of the EWP. The qualified environmental professional will be responsible for ensuring that procedures defined for material reuse in this SMP are followed and that unacceptable material will not remain on-site.

A-8 FLUIDS MANAGEMENT

All liquids to be removed from the site, including excavation dewatering and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site, but will be managed off-site.

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a SPDES permit.

A-9 SOIL COVER RESTORATION

After the completion of soil removal and any other invasive activities the soil cover will be restored in a manner that complies with the Excavation Notification. If the type of cover changes from that which exists prior to the excavation (i.e., a soil cover is replaced by asphalt), this will constitute a modification of the cover element. A figure showing the modified cover will be included in the subsequent Periodic Review Report and in any updates to the Site Management Plan.

A-10 BACKFILL FROM OFF-SITE SOURCES

All materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d). Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC. Solid waste will not be imported onto the site.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

A-11 STORMWATER POLLUTION PREVENTION

For larger excavations, procedures for storm water pollution prevention should be specified. For construction projects exceeding 1 acre, this is required. A summary of the Storm Water Pollution Prevention Plan that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulations should be included here. This plan may be included as an Appendix. The following text should appear somewhere in this section:

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in the SMP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters

Silt fencing or hay bales will be installed around the entire perimeter of the construction area.

A-12 CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for full a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the periodic reports prepared pursuant to Section 5 of the SMP.

A-13 ODOR CONTROL PLAN

This odor control plan is capable of controlling emissions of nuisance odors off-site [and on-site, if there are residents or tenants on the property]. If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of the property owner's Remediation Engineer, and any measures that are implemented will be discussed in the Periodic Review Report.

All necessary means will be employed to prevent on-site and off-site nuisances. At a minimum, these measures will include: (a) limiting the area of open excavations and size of soil stockpiles; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-site disposal; (e) use of chemical odorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods.

If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting/filtering systems.

A-14 DUST CONTROL PLAN

A dust suppression plan that addresses dust management during invasive on-site work will include, at a minimum, the items listed below:

- Dust suppression will be achieved through the use of a dedicated on-site water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing of larger sites will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

APPENDIX B – DEED RESTRICTION

DECLARATION of COVENANTS and RESTRICTIONS

THIS COVENANT ("Covenant") is made this 28th day of February, 2014, by **ROCKTENN CP, LLC**, a limited liability company organized and existing under the laws of the State of Delaware, having its principal place of business at 504 Thrasher Street, Norcross, Georgia 30071; and

WHEREAS, RockTenn CP, LLC as successor to Smurfit-Stone Container Enterprises, Inc. is the owner ("Owner") of a parcel of real property located at 55 Schenck Street, North Tonawanda, Niagara County, New York, being part of lands conveyed by Kathleen Greenland to Smirfit-Stone Container Enterprises, Inc., by deed dated July 15, 2008 and recorded on July 21, 2008 in the Niagara County Clerk's Office in Liber 3443 at Page 305, known and designated on the tax map of the County Clerk of Niagara as tax map parcel number: Section 185.05 Block 1 Lot 14, and being more particularly described in Appendix "A," attached to this Covenant and made a part hereof, and hereinafter referred to as the "Property"; and

WHEREAS, the New York State Department of Environmental Conservation (the "Department") approved a remedy to eliminate or mitigate all significant threats to the environment presented by the contamination disposed at the Property, and such remedy included the requirement to perform long-term groundwater monitoring; and

WHEREAS, in 2013, Owner requested the Department's approval to discontinue groundwater monitoring at the Property; and

WHEREAS, based on its review of the long-term monitoring results for the Property, the Department approved Owner's request to discontinue groundwater monitoring activities on August 27, 2013, subject to the requirement that Owner place an appropriate institutional control on the Property; and

NOW, THEREFORE, RockTenn, for itself and its successors and/or assigns, covenants that:

First, the Property subject to this Covenant is as shown on a map attached to this Covenant as Appendix "B" and made a part hereof.

Second, unless prior written approval by the Department, or if the Department shall no longer exist, any New York State agency or agencies subsequently created to protect the environment of the State and the health of the State's citizens (hereinafter referred to as the "Relevant Agency"), is first obtained, where contamination remains at the Property subject to the provisions of the approved Site Management Plan (the "SMP"), there shall be no construction, use or occupancy of the Property which threatens the integrity of any engineering controls, or which results in unacceptable human exposure to contaminated soils.

Third, the Owner of the Property shall not disturb, remove or otherwise interfere with (other than in a de minimis manner) the installation, use, operation, and maintenance of any engineering controls required for the remedy, which are described in an SMP, unless in each

instance the Owner first obtains a written waiver of such prohibition from the Department or Relevant Agency.

Fourth, the Owner of the Property shall prohibit the Property from ever being used for purposes other than commercial or industrial use without the express written waiver of such prohibition by the Department or Relevant Agency.

Fifth, the Owner of the Property shall prohibit the use of the groundwater underlying the Property for drinking water or potable use without treatment rendering it safe, unless the user first obtains permission to do so from the Department or Relevant Agency.

Sixth, at the Department's request, the Owner of the Property shall provide a periodic certification, prepared and submitted by a professional engineer or environmental professional reasonably acceptable to the Department or Relevant Agency, which will certify that the institutional and/or engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired.

Seventh, the Owner of the Property shall continue in full force and effect any institutional and/or engineering controls required for the remedy and maintain such controls, unless the Owner first obtains permission to discontinue such controls from the Department or Relevant Agency, in compliance with the approved SMP, which is incorporated and made enforceable hereto, subject to modifications as approved by the Department or Relevant Agency.

Eighth, this Covenant is and shall be deemed a covenant that shall run with the land and shall be binding upon all future owners of the Property, and shall provide that the Owner and its successors and assigns consent to enforcement by the Department or Relevant Agency of the prohibitions and restrictions that the SMP requires to be recorded, and hereby covenant not to contest the authority of the Department or Relevant Agency to seek enforcement of this Covenant.

Ninth, any deed of conveyance of the Property, or any portion thereof, shall recite, unless the Department or Relevant Agency has consented to the termination of such covenants and restrictions, that said conveyance is subject to this Covenant.

[signature page follows]

IN WITNESS WHEREOF, the undersigned has executed this instrument the day written below.

RockTenn CP, LLC
By: _____
Name: John D. Stakel
Title: Senior Vice President

STATE OF GEORGIA)
) ss:
COUNTY OF GWINNETT)

On the 12th day of May in the year 2014, before me, the undersigned, personally appeared John D. Stakel, personally known to me or provide to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person on behalf of which the individual(s) acted, executed the instrument.

_____
Notary Signature

Notary Stamp & Expiration Date:

M HENRY DAY JR
MY COMMISSION EXPIRES
NOV 28 2014
FULTON CO., GEORGIA
NOTARY PUBLIC

APPENDIX "A"

Legal Description

All that tract or parcel of land, situate in the City of North Tonawanda, County of Niagara and State of New York, being part of Lot 80 Mile Reserve, and being more particularly bounded and described as follows:

Beginning at the point in the southerly line of Schenck Street, distant 125 feet easterly measured along said line of Schenck Street from the point of intersection of the said southerly line of Schenck Street, with the northerly line of land conveyed by Mary F. Vandervoort and others to Niagara Bridge and Canandaigua Railroad Company by deed recorded in Niagara County Clerk's Office in Liber 88 of Deeds at Page 283;

Running thence southeasterly 290 feet to a point distant northeasterly 196 feet at right angles from the northeasterly line of lands conveyed by aforesaid deed;

Thence southeasterly 31.4 feet along the easterly line of land conveyed to the New York Central Railroad Company by deed recorded in Niagara County Clerk's Office in Liber 537 of Deeds at Page 38 (being a line the extension of which southerly intersects the northerly line of Thompson Street) at a point 205 feet easterly measured along the said northerly line of Thompson Street from the northeast line of lands conveyed by the aforesaid deed recorded in Liber 88 of Deeds at Page 283);

Thence easterly on a line parallel with Schenck Street, 221.5 feet to the westerly line of lands of the Erie Railroad Company;

Thence northwesterly and along the westerly line of lands of Erie Railroad Company about 319.375 feet to the southerly line of Schenck Street;

Thence westerly and along the southerly line of Schenck Street about 224 feet to the point or place of beginning.

As-Surveyed Description:

All that tract or parcel of land, situate in the City of North Tonawanda, County of Niagara and State of New York, being part of Lot 80 Mile Reserve, and being more particularly bounded and described as follows:

Beginning at the point in the southerly line of Schenck Street, distant 481.26 feet westerly as measured along said line of Schenck Street from the westerly side of Oliver Street;

Running thence southerly at an interior angle of 111° 59' 57" with said southerly side of Schenck Street, a distance of 319.375 feet;

Thence westerly along a line parallel with Schenck Street, a distance of 221.50 feet to a point of land now or formerly of New York Railroad;

Thence northerly along said lands now or formerly of New York Railroad, 31.40 feet;

Thence northerly along a line a distance of 290.00 feet, and forming an internal angle of 66° 05' 31" with the southerly side of Schenck Street;

Thence easterly along said southerly side of Schenck Street a distance of 224.99 feet to the point or place of beginning.

APPENDIX C.

Remedial Action are provided in the report entitled:

INDUSTRIAL WASTE AND SOIL REMOVAL ACTION FINAL REPORT, SCHRECK'S SCRAPYARD, North Tonawanda, New York, Prepared for: OCCIDENTAL CHEMICAL CORPORATION, Niagara Falls, New York, Prepared by: DUNN GEOSCIENCE CORPORATION, Amherst, New York, Dated:, June2, 1991,

INDUSTRIAL WASTE AND SOIL REMOVAL ACTION FINAL REPORT

SCHRECK'S SCRAPYARD

North Tonawanda, New York

Prepared for:

OCCIDENTAL CHEMICAL CORPORATION
Niagara Falls, New York

Prepared by:

DUNN GEOSCIENCE CORPORATION
Amherst, New York

Dated:
June 2, 1991

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1.0 INTRODUCTION

This report presents the results of an Industrial Waste and Soil Removal Action conducted from January 10 to March 7, 1991 by the Occidental Chemical Corporation (OCC) at the Schreck's Scrapyard Site ("Site") in North Tonawanda, New York, now owned and operated by VJT Salvage, Inc. The Removal Action consisted of the excavation, removal and appropriate disposal of surficial soils, drummed industrial waste, debris, water and contaminated soil, and the performance of hydraulic integrity tests in an abandoned automobile press pit ("Pit") on the "Site". The work conducted during this Removal Action conformed with the Work Plan prepared by Dunn Geoscience Corporation (DUNN) for OCC and submitted to New York State Department of Environmental Conservation (NYSDEC) entitled:

> "Work Plan for an Industrial Waste and Soil Removal Action at Schreck's Scrapyard North Tonawanda, New York" dated, November, 1990.

Occidental Chemical Corporation entered into an Order on Consent with the NYSDEC on January 16, 1991 to conduct the Removal Action predicated on previous site investigations. The Site had been classified as a Class 2 Site on the NYSDEC Registry of Inactive Hazardous Waste Disposal Sites as a result of the prior investigation which identified environmental concerns at the Site. These previous investigations, discussed further in Section 2.3 of this report, indicated that the Site was contaminated with PCBs and contained some organic compounds and metals. The investigations also revealed that an abandoned automobile press pit on the Site contained deteriorated drums of Durez type industrial waste, and that the industrial waste had been in contact with the soil and water in the Pit. The purpose and scope of the Removal Action was to excavate and dispose of the surficial soils, drummed industrial waste, debris, water and contaminated soil and perform hydraulic integrity tests on the Pit. The Order on Consent, stipulated that if the Pit was found to lack hydraulic integrity, as determined by the procedures set forth in the Work Plan, OCC and NYSDEC would seek to enter into a subsequent Order on Consent and Work Plan regarding an investigation of potential migration of Durez type industrial waste from the Pit, and, if necessary, removal of migrated Durez type industrial waste.

2.0 PROJECT BACKGROUND

2.1 Site Location and Description

The Site, located at 55 Schenck Street in North Tonawanda, New York is presently operated as an automotive scrapyard by VJT Salvage, Inc. The site is commonly referred to as Schreck's Scrapyard. Figure 1 shows the scrapyard's location with respect to the regional area.

The Site is located in a mixed light industrial and residential area. The scrapyard is bordered on the north by Schenck Street and the Lawless Container Corporation located across the street

(Figure 2). Lawless also borders the west side of the Site and Tondisco Incorporated borders the south side of the Site. The eastern border of the Site consists of Conrail tracks. East of these tracks is an empty lot which, at one time, was the location of a metal fabrication shop. Although no residential property is adjacent to the Site, a dense residential neighborhood lies approximately one block east of the Site.

The approximately 1.5 acre scrapyard is in a deteriorated condition. The fencing around the Site is damaged at various locations providing easy access to trespassers. The Site contains three significant structures; a cinder block office building, a garage, and the frame of an abandoned bailer machine with a concrete foundation. Adjacent to the bailer machine frame is the Pit. The Site has a soil base containing scrap material, is oily and essentially void of vegetative growth. The site also contains various piles of scrap (tires, cars, refrigerators) and is normally filled with junk cars and automotive parts.

2.2 Site History

Schreck's Iron and Metal Company operated a scrap iron business at the Site from 1951 to 1953, Site operations prior to 1951 are unknown. In 1953, the business was sold to Bengart, Memel and Company who reportedly operated a scrap metal business until 1977. In addition to the metal salvage operation, the Site was used as a transfer station for wastes hauled by the facility's trucks to local waste disposal facilities between 1951 and 1975. When waste in the form of drums was picked up late in the day, the truck loaded with the drums would apparently be kept at the Site overnight. In 1965, allegedly 50-60 drums of industrial waste from Durez Plastics & Chemicals, Inc., of which OCC is the successor in interest, were placed in the Pit located at the south end of the Site. Durez was not notified that the drums of waste were used in this manner. The drums were placed into the Pit on top of building debris, which partially filled the Pit, and were then covered with approximately two feet of soil.

From 1960 to 1975, transformers, said to have originated from the Niagara Mohawk Power Corporation, New York State Electric and Gas and Westinghouse Electric Corporation were routinely brought to the Site for salvage. The metal carcasses were sheared and the oil was then allowed to spill onto the ground. Reportedly, the oil soaked soils were periodically excavated by a dozer and pushed towards the eastern property boundary, as well as onto the Pit.

2.3 Summary of Previous Investigations

Four investigations have been undertaken to identify environmental conditions at the Site. The first investigation was undertaken in 1983 when Lawless Container Corporation retained Recra Research, Inc. (Recra) to conduct a pre-purchase environmental assessment of the property. Analysis of two composite soil samples from outside the Pit revealed the presence of PCBs (18

and 66 mg/kg), elevated levels of metals, and the presence of cyanide, phenolics and volatile organic compounds.

In 1986, Recra was retained by the NYSDEC to conduct a Phase I Investigation, the purpose of which was to collect available information and score the Site, using standard ranking models, to determine if the Site was eligible for the State and/or Federal priority list of uncontrolled hazardous material sites. The Site is currently ranked as a Class 2 Site on the NYSDEC Registry of Inactive Hazardous Waste Disposal Sites.

In 1988, Eder Associates was retained by the NYSDEC to conduct a Remedial Investigation/ Feasibility Study (RI/FS) at the Schreck's Scrapyard Site. The RI/FS analytical results indicated that the Site is contaminated with PCBs, as well as some organic compounds and metals.

In 1989, DUNN was retained by Whiteman Osterman & Hanna to sample three of the drums and the soil in the Pit. The analytical results from these samples have been shared with the NYSDEC and were included in the Work Plan and herein, as Appendix A. The analysis of samples from within the Pit also revealed the presence of PCBs at levels less than 50 ppm.

The presence of waste in the Pit prompted the development of an Order on Consent and a Work Plan for the removal of industrial waste and contaminated material in the Pit and the performance of the pit hydraulic integrity tests. The Work Plan, formally approved by the NYSDEC, served as the basis of the waste removal effort; defined sampling and analytical protocols; outlined waste material excavation, storage and transportation requirements; and provided a health and safety plan.

3.0 SITE PREPARATION

3.1 General

Prior to initiating work on-site in accordance with the approved Work Plan, a general cleanup of the Site had to be undertaken. VJT Salvage, Inc. removed from the work area the junk cars, automobile parts, tires and debris to provide access to the Pit.

3.2 Fencing

The chain-link fence, previously installed during DUNN's 1989 investigation to restrict entry to the Pit, was removed to provide working access to the Pit.

OCC installed temporary snow fencing and repaired existing fencing along the railroad tracks on the eastern perimeter of the Site to restrict unauthorized access to the work area.

The snow fencing was installed to cordon off the 30 to 40 foot wide access roadway on the eastern side of the Site. A 40 foot double wide, chain-link swing gate was installed at the Schenck Street entrance to the Site joining the snow fence on the west side of the access roadway and the existing fence along the railroad tracks.

A snow fence was installed from the southwest corner of the old bailer machine to the existing south property line fence, thus, enclosing the complete work area.

The installation of the fencing is shown on Plate 1.

3.3 Temporary Facilities

Temporary facilities were placed on the Site during mobilization for the work and were maintained until demobilization. These facilities included an office trailer, mobile personal decontamination trailer, a construction shanty and portable sanitation stations. The office trailer, which functioned as a base of operations for OCC, was placed east of the railroad tracks on the south side of Schenck Street. The twenty-four hour security guard service used the office trailer as a base of operation.

The personnel decontamination trailer was situated west of the access road, just inside the snow fence and the Schreck Street entrance gate. The personnel decontamination trailer contained all protective and safety equipment and provisions required by the NYSDEC approved Health and Safety Plan.

The location of the trailers is shown on Plate 1.

3.4 Access Road

Historically, oils containing PCBs were drained from transformers onto the ground, and subsequently, most of the surface area of the site has become contaminated. Therefore, a temporary access road was constructed by OCC to prevent the waste removal trucks from picking up PCB contaminated soils on their tires and inadvertently carrying contaminated soil beyond the Site. The access road was constructed on the Site parallel to the eastern property fence from the entrance gate at Schenck Street to the south end of the Pit, a distance of 260 feet. The road was 30 feet in width, but flared at the south end to 40 feet in width to accommodate handling, loading, storing and staging areas. The location of the access road is shown on Plate 1.

The road was constructed of a three liner system; a 3/16 inch thick SUPAC non-woven geotextile on the bottom, a 60 mil plastic textured liner in the middle and a 1/16 inch TYPAR fabric geotextile on the top. The thick bottom geotextile acted as a cushion to prevent the puncturing of the 60 mil textured liner by the underlying scrapyard debris. After the bottom

geotextile and the 60 mil textured liner were installed, railroad ties of varied length, were placed near the edge of the liner and the liner was curled up and back over the ties and secured to the tops of the ties. Additionally, the securing of the 60 mil textured liner over the railroad ties provided a spill containment measure for the access road. The TYPAR geotextile fabric liner was then installed to protect the textured liner. Whenever the TYPAR geotextile layer became dirty it was disposed of in a waste roll-off trailer and replaced with a new geotextile layer. All truck traffic moved to and from the Pit area by way of this temporary access road. The construction of the access road precluded the need for the decontamination pad called for in the Work Plan since all of the equipment operated off of primarily clean surfaces. This change in the Work Plan was approved by on-site NYSDEC personnel.

3.5 Staging Areas

To meet the spill contingency measures required by the Work Plan, the tanker trucks to which Pit liquids were to be pumped, were staged on the bermed/lined access road approximately 30 feet to the east of the Pit. Each lined roll-off trailer, was also parked on the bermed access road approximately 20 feet to the east of the Pit.

As described in Section 4.1, a mixing box (roll-off) was placed directly north and east of the Pit adjacent the access road and was used to mix the soil and debris from the Pit with lime. A plastic liner was placed around the box as a spill contingency measure. The staging area location is shown on Plate 1. The location of the staging areas and the spill containment measures provided, were all approved by NYSDEC's on-site personnel.

3.6 Site Security

OCC provided full time 24 hour manned security from mobilization to demobilization, as required by the Work Plan. The security guards ensured that all individuals entering the Site signed the log book, that the fencing was not breached, that the entrance gate was locked during off-hours, as well as provided general surveillance of the Site.

4.0 DRUM REMOVAL AND DISPOSAL

4.1 Excavation and Drum Removal

The Work Plan called for the segregation of uncontaminated surficial soil from soil contaminated by the presence of industrial waste. However, prior to excavation, in an agreement reached between OCC and NYSDEC, OCC agreed to excavate, remove and dispose of all Pit contents.

The Work Plan also called for the loading of the excavated soil, debris and drums directly into the lined roll-off trailers. However, due the highly saturated condition of the Pit contents, it was agreed between OCC and NYSDEC, to mix lime with the saturated material prior to loading into the roll-offs. This was accomplished by use of a mixing box (roll-off) staged adjacent to the Pit or by mixing lime directly into the Pit.

Excavation of the Pit began on January 23, 1991 with the removal of surficial soils on the east side of the Pit. The surficial soils were loaded directly into the roll-off trailers. Lime was not mixed with surficial soils, as they were dry enough to load directly.

On January 24, 1991, a dewatering sump was excavated near the east end of the Pit. The depth of the sump was 10 feet, which corresponded with the bottom of the Pit. Using a two inch trash pump with a filter attachment, approximately 4,900 gallons of interstitial Pit water was pumped to the tank trailer on the first day. Over the next several days, very little water accumulated in the dewatering sump and minimal pumping was required.

On January 25, 1991, the areal limits of the Pit were probed using a backhoe. The location and linear extent of the northern and southern walls of the Pit were established. Concerted excavation failed to locate the west Pit wall, which was shown to exist on an original Pit construction drawing. Also on January 25, 1991, the use of hydrated lime began. Lime, was intermittently mixed with the Pit contents in the mixing box and/or in the Pit itself to effectively dry the materials before loading into the roll-off trailers. Approximately 34 tons of hydrated lime were used throughout the Removal Action to dry the excavated material before loading it into the roll-off trailers.

During the week of January 28, 1991, the west wall of the Pit was uncovered at a location approximately 10 feet east of where it was believed to be. The top of the west wall was found to be approximately four feet below the existing grade. Excavation of the Pit contents continued throughout the week. Most drums were found to be crushed or in a very deteriorated condition. Drums were first found at a depth of three feet below the surficial soil covering the Pit. The drums contained both solid and viscous liquid waste. The material excavated from the Pit included material similar to that encountered during the sampling investigation. The excavated material contained 160 crushed and deteriorated drums and approximately ten of the drums found in the Pit contained liquids that appeared to be gear oil or a reddish oil similar to automotive transmission fluid. All prior historical information indicated that there were only 50 or 60 drums of Durez type industrial waste in the Pit.

On January 29, 1991, Pit dewatering was resumed as the water level within the dewatering sump had risen two to three feet from natural drainage of the Pit material to the lower sump. Pumping on this day, of approximately 4,400 gallons of Pit water, essentially completed dewatering.

During the course of the remaining excavation, only pumping of small amounts of Pit water was necessary.

Excavation of all Pit materials was completed by February 1, 1991. Photographs 1 and 2 in Appendix B show excavation operations.

4.2 Waste Water and Solid Waste Transport/Disposal

All waste water pumped from the Pit was initially stored and later transported to a permitted treatment facility in 6,300 gallon tankers. The tankers were staged on and loaded in the tanker loading area on the access road at the Site. Analytical samples were taken from the tankers and sent to the treatment facility for analysis. Refer to Section 5.1 for description of waste water sampling and analysis. The volume of water was measured and properly documented before the waste water was transported to a permitted facility. Two tankers from Tonawanda Tank Transport, Inc., containing all the waste water dewatered from the Pit, approximately 10,950 gallons, was transported to DuPont's Deepwater, New Jersey permitted facility for treatment.

The industrial waste excavated from the Pit was loaded into plastic lined 20 cubic yard roll-off trailers in the trailer loading area on the access road. All loaded roll-off trailers were weighed, properly manifested and hauled to a permitted disposal facility. Twenty-three loads, with a combined load of approximately 380 tons, were transported by the United States Pollution Control, Inc. to their Lone Mountain, Oklahoma permitted facility. All manifest documentation was completed and sent with each and every shipment. Refer to Section 5.2 for description of solid waste sampling and analysis. All transporting and disposal of waste water and solid waste was performed in accordance with the approved Work Plan and overseen by NYSDEC's on-site personnel.

5.0 SAMPLING AND ANALYSIS

5.1 Waste Water Sampling and Analysis

Water samples were collected from the tankers containing Pit waste water and personnel decontamination wash water. All waste water was pumped through a filter before entering a tanker truck. The waste water samples were collected with a dip sampling device through the fillport at the tankers' top and placed in one liter glass containers. The containers were immediately labelled with the sample number, job name, date, and analysis requested. The samples were then, either delivered to Recra or transferred under custody, to the on-site Construction Manager. The waste water was analyzed, pursuant to the approved Work Plan, for semi-volatiles, TOC and total phenols. Waste water samples were also shipped to the disposal/treatment facility for their analyses to confirm that the waste water could be accepted at

their facility. The waste water sampling identification and analytical results are summarized in Appendix C of this report.

5.2 Solid Waste Sampling and Analysis

Pit samples were collected by using the excavator bucket to excavate a small portion of the Pit material from selected locations. A total of eight (8) discrete soil samples were collected at depths of one, three, five, seven, and eight feet. Soil sample locations are diagrammed on Figure 3. The excavator bucket was then placed beside the excavation and a portion of the material in the bucket was placed in a decontaminated stainless steel bowl with a stainless steel spoon as called forth in the Work Plan. The procedure was repeated at the same elevation at three more locations (sub-samples) in the Pit. Four sub-samples were collected for each half of the Pit. Once the four sub-samples were collected for each half of the Pit, the material in the bowl was thoroughly mixed and transferred in the appropriately labelled sample containers. Therefore, two composite samples were collected at each specified depth within the Pit. The samples were kept cool and the proper Chain-of-Custody procedures, pursuant to the QAPP, were utilized. The samples were subsequently analyzed under U.S. EPA Contract Laboratory Protocols for Target Compound List semi-volatiles and PCB isomers at Recra Environmental, Inc. The analytical results revealed that besides the detection of semi-volatiles, PCBs were also detected at levels as high as 70 ppm (total PCBs). The solid waste analytical results are summarized in Appendix C of this report. The total PCB concentrations are also diagrammed in Figure 4.

5.3 Organic Vapor Monitoring

Before implementation of the air monitoring program, as set forth in the Work Plan, the wind direction at the Site was established by two methods. The first recorded the wind direction reported on the National Weather Service radio station. In the second confirmatory method, several ribbons were tied to the fence post along the access road, to act as wind socks. At all times, both methods produced the same results. Thus, up and downwind locations were determined for the Site for each work day. The wind direction was monitored at two hour intervals or less.

Real time air monitoring for organic vapors was conducted up and downwind of the Site and in the breathing zone of Site personnel. The monitoring instrument used was a HNU PI-101, photoionization detector calibrated daily to the manufacturer's specifications. Organic vapor readings were recorded at two hour intervals or less.

Background HNU readings were acquired once at the beginning of each day from the ambient air outside the office trailer and ranged between 0.1 ppm and 0.3 ppm. The highest HNU readings recorded during excavation or other activities at the Site were 2.0 ppm in the breathing zone and 0.6 ppm at the Site perimeter. When HNU readings exceeded 1.0 ppm, all personnel in

the breathing zone upgraded from Level D protection to Level C protection, as required by the action level criteria specified in the Health and Safety Plan, Appendix D of the approved Work Plan. All organic vapor readings were recorded in a log book, with the time, activity and location on the Site of each reading. Daily air quality sheets reporting the organic vapor readings for each day are provided in Appendix D of this report.

5.4 Explosive Vapor and Oxygen Monitoring

A Scott-Alert Model S 105A was used to detect the oxygen and explosive gas levels in the Pit. All measurements were logged in a field book and are recorded on daily air quality sheets in Appendix D of this report.

At no time during the Removal Action at the Site did the percentage of oxygen drop below the required minimum of 19.5 percent nor did the lower explosive limit exceed the allowed maximum of five percent, which are active levels stipulated in the approved Health and Safety Plan.

5.5 Airborne Particulate Monitoring

Airborne particulate matter was monitored with a direct reading real time particulate monitor at a downwind monitoring station. The particulate monitor used was a MIE PDM-3 Miniram and was factory calibrated. Background particulate matter readings were 0.00 mg/m^3 and perimeter readings were taken at a minimum of every two hours.

At no time did particulate matter readings exceed background at the Site perimeter (fence line). All particulate matter readings are reported on the daily air quality monitoring results in Appendix D of this report.

5.6 Airborne PCB Sampling and Analysis

Airborne PCB monitoring stations were established daily at locations upwind and downwind of the Pit and on the Site perimeter. The monitoring stations utilized portable SKC Inc. Model 224-PCXR3 Flow Controlled Air Pumps calibrated daily with a Buck Calibrator or rotameter. The sampling tube and filter utilized in this sampling program is as stated in NIOSH Method 5503. NIOSH Method 5503 is explained in the HASP. Each florisil tube and filter was labelled with the job name, date, sample number, and up or downwind position.

The airborne PCB sampling was continuously conducted beginning one hour prior to the start of Site activities and ended one hour after activities, from January 18 to January 24, 1991. On January 25, 1991, the running time before activities was reduced by one-half hour, per agreement with on-site NYSDEC personnel. The last sampling date was February 12, 1991.

The daily PCB air samples were delivered, by courier, under strict Chain-of-Custody procedures to OCC's Grand Island, New York facility for analysis.

The airborne PCB samples were analyzed for Aroclor 1242 and 1254, using NIOSH Method 5503. Field blanks were collected at the rate of one per every 10 field samples, and laboratory spikes were analyzed every sampling day. None of the 36 PCB samples, collected and analyzed during the Schreck's Removal Action, showed levels of Aroclor 1242 or 1254 at or above the one ug/m^3 method detection limit as called for in the HASP. All quality assurance blanks and spikes were analyzed and found to be acceptable. The results from this sampling program are summarized in Appendix D of this report.

6.0 PIT REMEDIAL CONSTRUCTION

6.1 Pit Cleaning

After all of the surficial soils, drummed industrial waste, debris, water and contaminated soils were removed from the Pit, the Pit was cleaned in accordance with the Work Plan. The first step in cleaning the Pit was to scrape large particles of residue (chemical tars and caked soils) off the floor and walls with flat shovels. The entire inside surface of the Pit was then sandblasted, removing all visible contamination. Sandblasted material, including the sand, was loaded into a roll-off for disposal with the other Pit waste. The sandblasting was followed by washing the Pit with water from a high pressure hose. The sandblasting and washing operations were inspected and accepted by NYSDEC personnel on Site.

6.2 Pit Survey and Description

Upon completion of the excavation of the Pit contents and the cleaning operation, dimensional survey of the Pit was undertaken and a sketch prepared of the Pit in plan view and section. (Refer to Plate 2.)

The Pit is an odd "L" shaped structure with the inside dimensions of 28.8 feet long (east-west) by 14.6 feet wide (north-south) except for a nine foot section of the eastern end of the Pit, which is 20 feet wide (north-south). The western end of the Pit, steps up four feet to a seven and one half feet long ledge. The Pit is slightly less than 10 feet deep except at the western ledge which is six feet below grade.

The existing poured concrete walls of the Pit in the 10 feet deep section are approximately one and one half foot with one foot wide concrete block walls, two to four feet in height on the western ledge. The poured concrete walls are uneven at the top.

The concrete blocks of the west wall and the western end of the north and south walls on the ledge are in deteriorated condition and are two feet to four feet below existing grade. The floor of the Pit is poured concrete, with exposed reinforced bars and steel pipes. The thickness of the floor and the ledge was not determined. At several locations, vertical steel pipes were exposed at the top of the wall. The function of these pipes is unknown.

An existing sump is located in the concrete floor on the north side of the Pit near the ledge. It is 1.13 feet deep and 1.8 feet in diameter. A two inch diameter pipe/conduit extends into the sump from the southeast just below the floor surface. Whether the pipe traverses in or under the concrete floor could not be determined. The purpose for this pipe is unknown, but is probably an electrical conduit or a drain/discharge pipe.

Three concrete piers were located in the Pit at 3.3, 9.2 and 17.6 feet, respectively from the east wall. The piers are seven feet long, 5.15 feet high, two feet wide at the base, and one foot wide at the top. These piers appear to have been cast in place on top of the Pit floor, with reinforcing rods tying the piers to the concrete floor. During cleaning of the Pit, the piers were removed in order to clean the floor beneath them. The removal caused no damage to the Pit floor, and the piers were later placed back in the Pit, with approval of NYSDEC's on-site representative, after Pit cleaning was completed. Photographs numbered 3 and 4 in Appendix B are of the Pit.

6.3 Masonry Wall Construction

In order to properly support a roof structure over the Pit, as called for in the Work Plan, the existing Pit walls had to be levelled. Since the tops of the existing concrete pit walls were uneven and rough, with the approval of NYSDEC, a concrete levelling cap was poured over the existing walls. This cap provided a level and sound base to construct an approximate four foot high, eight inch wide masonry block wall to support the roof structure. An OCC design engineer reviewed, in the field, the condition of the Pit and designed the wall extensions and roof structure. (See Section 6.4 for roof construction.) The NYSDEC approved the design and construction. The new walls were approximately three feet above existing grade. The existing deteriorated, shorter, west masonry wall was left in place and a new eight inch block masonry wall was constructed on the existing eastern end of the ledge to the height of the other raised walls. (Refer to Plate 3 and Photographs numbered 4 and 5 in Appendix B.) The masonry walls were coated with foundation sealer and the surrounding area was graded, so that water would drain away from the Pit.

6.4 Pit Roof Construction

Upon completion of the masonry wall construction, a roof, meeting OCC design specifications, was built over the Pit to prevent entry of rain water. The Pit roof was constructed of pressure treated two by twelve inch wooden rafters on one foot centers and sheeted over with three-

quarter inch CDX exterior grade plywood. The roofing material was 90 pound mineral coated, rolled roofing with tarred and nailed seams. The roof sloped to the north, with the exception of the southeast corner which sloped to the south. In the southeast corner, an entrance hatch and ladder were installed to allow access to the bottom of the Pit. Three turbine roof vents were installed and 12 side vents were installed in the masonry wall at evenly spaced intervals around the entire perimeter. (Refer to Plate 3 and Photograph number 6 of Appendix B of this report.)

6.5 Pit Integrity Testing

After the Pit contents were excavated and removed and the Pit walls and floor cleaned by sandblasting and washing, the inner surfaces of the Pit were inspected for cracks, as called for in the Work Plan as Step One of the Evaluation of Pit Integrity. The existing west masonry wall was observed to have numerous cracks with water and brown liquid seeping into the Pit from a number of the cracks. Water was also seeping into the Pit from a crack in the east wall and at the contact of the east wall and the floor. Based on these observations, the Pit was not watertight and leakage was occurring from the outside of the Pit into the Pit.

The second step specified in the Work Plan, for verification of the Pit's water tightness was also carried out. The water level of the monitoring well nearest the Pit, MW-6, was measured at a level greater than one foot above the elevation of the Pit floor. Therefore, a positive pressure gradient existed into the Pit at the time of measurement and the Pit was considered to leak at the joint between the wall and the floor.

Even though it was determined by Step One and the first phase of Step Two that the Pit leaked, a hydrostatic test was performed to try to understand the Pit's hydraulic integrity, that is, rate of seepage. This test was carried out after the roof was installed to prevent intrusion of rain water. A stilling well made of two inch PVC pipe was attached to the access ladder in the southwest corner of the Pit, and by use of a steel measuring tape inserted down the stilling well, the water level in the Pit was measured at elevation 567.89 feet or approximately 0.3 feet above the Pit floor (567.59 feet). The water in the Pit at the time of measurement was a result of Pit seepage and rainfall accumulation before the roof was installed. The water level in MW-6 was measured at the same time and was at elevation 568.94 feet. The first test conducted was not accurate because leakage was observed in a section of the new block wall constructed for the roof resulting in an increase of 15/16 of an inch of water in the Pit over a 64 hour time frame. The test was run a second time, after the new wall was resealed with foundation sealer and the Pit water level increased one eighth of an inch over a 24 hour time frame.

As a result of the visual inspection and tests conducted, it was determined that the Pit was not watertight and with the Pit empty, there was an inward groundwater gradient resulting in seepage from outside the Pit into the Pit. However, when the Pit was full with water and soil, before the

initiation of the Removal Action, the water level in the Pit was approximately two feet above the top of the lower west Pit wall.

7.0 EQUIPMENT DECONTAMINATION

The two backhoes used for excavation were decontaminated by hand scraping the buckets to remove remaining soil and visual contamination. This operation was performed over the Pit and the scraped material was then shovelled into five gallon pails and placed in the waste roll-off trailer. The backhoe buckets were then sandblasted over the Pit and the material also shovelled into five gallon pails for disposal in the roll-off trailer. This operation was performed before the Pit was cleaned with water hoses. The mixing box was decontaminated by hand scraping the inside of the box and removing and transferring scraped material in five gallon containers to the waste roll-off container. Water pumps were cleaned by flushing with tap water and the water pumped directly to the waste tanker. The hoses and hand tools used in the Pit area, were disposed of in the waste roll-off container. All decontamination fluids were disposed of in the waste roll-off trailer. All equipment was inspected for proper decontamination and approval by NYSDEC personnel before leaving the Site.

8.0 DEMOBILIZATION AND FENCE INSTALLATION

After decontamination and inspection and approval by NYSDEC, all equipment was removed from the Site. Minor construction debris and scrap materials were placed in the last waste roll-off trailer. All road materials were considered to be contaminated and were cut into narrow widths and disposed of in the waste roll-off trailer.

The utilities were disconnected and the two trailers and the construction shanty, which were all outside the Exclusion Zone were moved off site, thereby completing the demobilization process.

An eight foot chain link fence was installed around the Pit area to segregate the Pit from the rest of the Scrapyard. The fence that had been previously removed from between the bailer foundation and the property line was re-installed.

9.0 SUMMARY

On January 16, 1991, OCC entered into an Order on Consent with NYSDEC for the removal and disposal of surficial soils, drummed industrial waste, debris, water and contaminated soils from an abandoned automotive press pit at Schreck's Scrapyard. The Order on Consent also required that OCC perform integrity tests on the Pit and prepare a Work Plan detailing all activities required to carry out the Removal Action.

A Work Plan was prepared and approved by NYSDEC and the Removal Action, as described in the approved Work Plan, was conducted between January 10, 1991 and March 7, 1991. Each and every change to the Work Plan required by on-site field conditions as described in this report was approved by NYSDEC on-site personnel.

All field activities were documented, as required by the approved Work Plan, to provide a permanent record of all remedial construction activities. All requirements of the approved Health and Safety Plan (HASP) and the approved Quality Assurance Project Plan (QAPP) were adhered to except, as noted in this report as a NYSDEC approved change.

The procedures and methodologies utilized to excavate and remove the Pit contents have been described in detail in this report. The type and quantity of wastes removed from the Pit is summarized as follows:

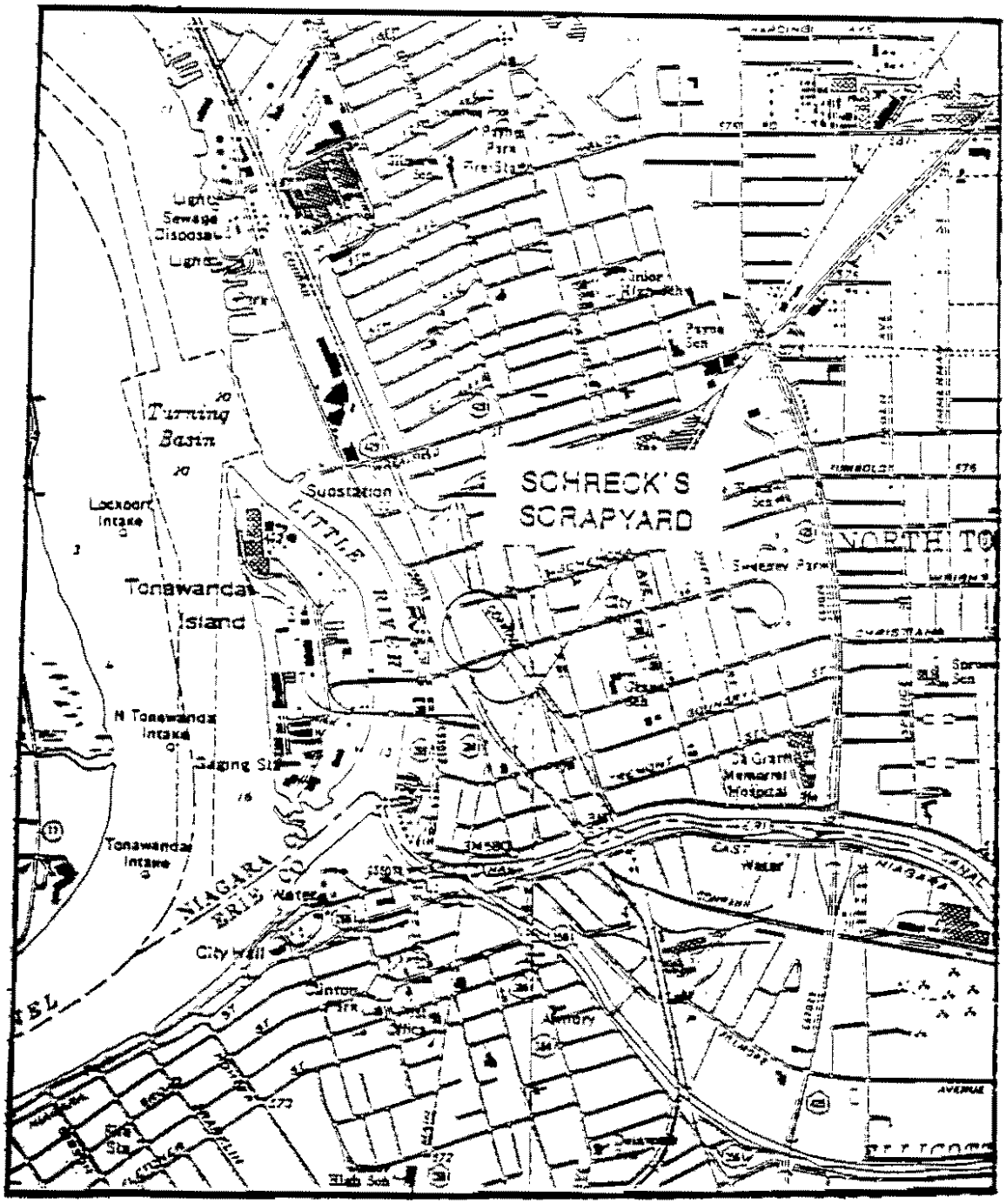
Waste Type	Quantity Removed	How Transported	Permitted Disposal Facility
Waste Water	10,950 gal.	6,300 gal. capacity Tanker Trucks	DuPont's Deepwater, New Jersey Treatment Facility
Solids: Drums, Debris, Soil	380 Tons(1)	20 cy Roll-off Trailers	United States Pollution Control, Inc., Lone Mountain Oklahoma Facility

(1) Included 160 drums

Sampling of the waste water and solids from the Pit was conducted in accordance with the approved QAPP. All samples were analyzed for TCL semi-volatiles and PCB isomers. All analyzed results are summarized in Appendix C to this report. Samples were sent for analysis to both OCC's subcontracted laboratory and the permitted disposal facilities previously listed.

Subsequent to the removal of all of the Pit contents, the Pit was thoroughly cleaned by sandblasting and high pressure water hose. As described in detail in Section 6.5, Pit Integrity Testing of this report, the Pit was then thoroughly inspected and the steps described in the approved Work Plan for evaluating the Pit's integrity were carried out. As a result of the visual inspection and tests conducted, it was determined that the Pit was not watertight and with the Pit empty, there is an inward groundwater gradient resulting in seepage into the Pit.

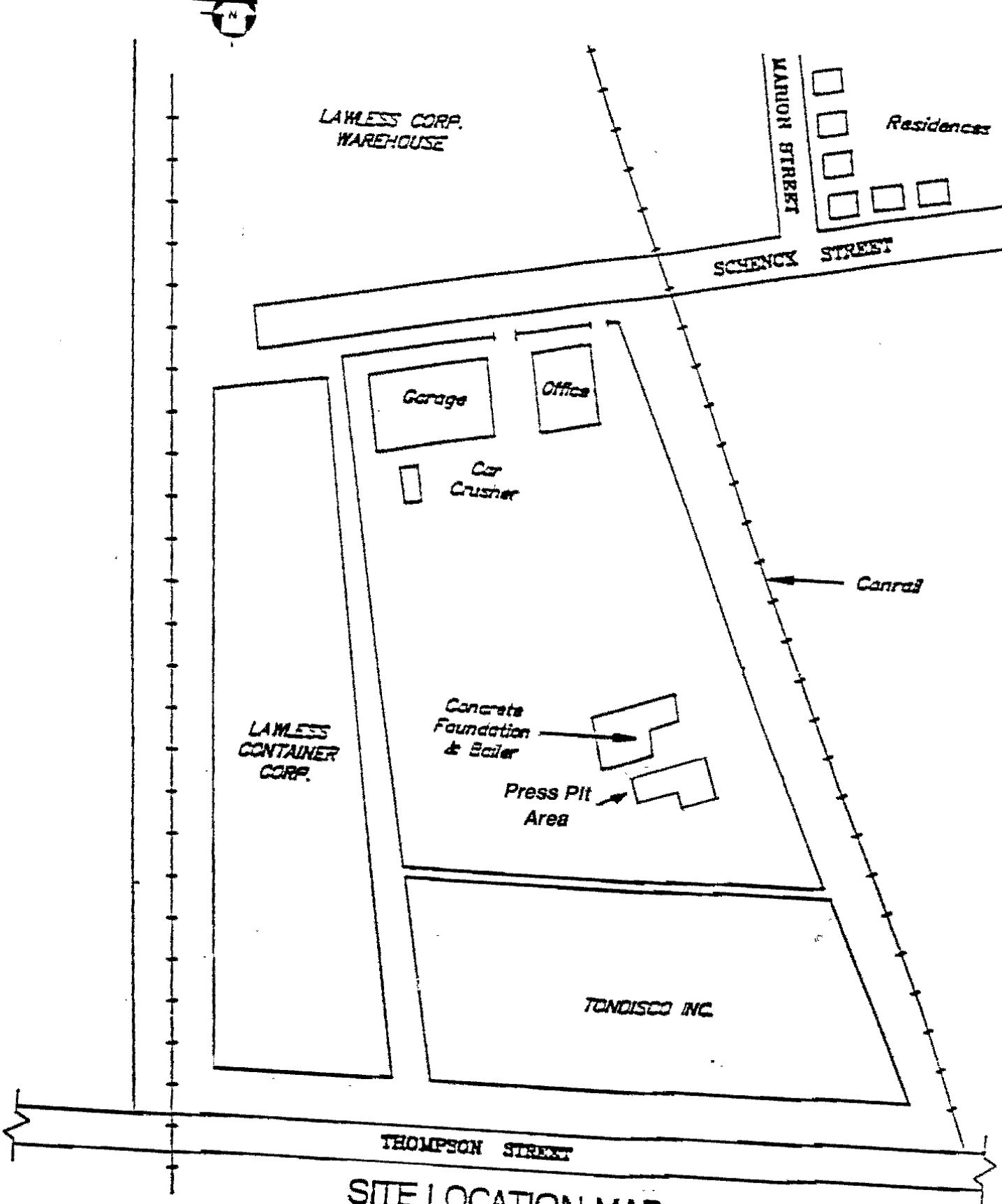
SCHRECK'S SCRAPYARD SITE
NORTH TONAWANDA, NEW YORK



SCALE : 1"=2000'

LOCATION MAP

FIGURE 1



SITE LOCATION MAP

SCHRECK'S SCRAPYARD
N. TONAWANDA, NEW YORK

FIGURE 2

APPENDIX A

ANALYTICAL RESULTS OF DRUMMED WASTES AND CONTIGUOUS SOIL SAMPLED AT THE SCHRECK'S SCRAPYARD PIT DECEMBER, 1989

OCCIDENTAL CHEMICAL CORPORATION
ENVIRONMENTAL DATABASE SYSTEM

ND-Not Detected above CRDL

SCHRECK'S SCRAPYARD
SOIL SAMPLES

Special Codes: D - FIELD DUPLICATE

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte was detected in the reagent blank, sample results not corrected.
N - Results are estimated, sample analyzed outside holding times.
M - Presumptively present, not confirmed by GC/MS.

	Sample Date:------->	12/19/89	12/19/89	12/19/89	12/19/89
	Sample Description:->	SS 1	SS 1	SS 2	SS 3
	Special Code:------->	D			
Analytes:	Units:	CRDL:			
CHLOROMETHANE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
BROMOMETHANE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
VINYL CHLORIDE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
CHLOROETHANE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
METHYLENE CHLORIDE	ug/kg	5	2200 B	2100 B	1800 B	2000 B
ACETONE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
CARBON DISULFIDE	ug/kg	5	ND870	ND870	ND870	170 J
1,1-DICHLOROETHYLENE	ug/kg	5	ND870	ND870	ND870	ND800
1,1-DICHLOROETHANE	ug/kg	5	ND870	ND870	ND870	ND800
1,2-DICHLOROETHENE (TOTAL)	ug/kg	5	ND870	ND870	ND870	400 J
CHLOROFORM	ug/kg	5	ND870	ND870	280 J	ND800
1,2-DICHLOROETHANE	ug/kg	5	ND870	ND870	ND870	ND800
METHYL ETHYL KETONE (2-BUTANONE)	ug/kg	10	ND1700	ND1700	ND1700	ND1600
1,1,1-TRICHLORO-ETHANE	ug/kg	5	ND870	ND870	ND870	ND800
CARBON TETRACHLORIDE	ug/kg	5	ND870	ND870	ND870	ND800
VINYL ACETATE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
DICHLOROBROMOMETHANE	ug/kg	5	ND870	ND870	ND870	ND800
1,2-DICHLOROPROPANE	ug/kg	5	ND870	ND870	ND870	ND800
CIS-1,3-DICHLOROPROPENE	ug/kg	5	ND870	ND870	ND870	ND800
TRICHLOROETHYLENE	ug/kg	5	ND870	ND870	ND870	ND800
DIBROMOCHLORO-METHANE	ug/kg	5	ND870	ND870	ND870	ND800
1,1,2-TRICHLORO-ETHANE	ug/kg	5	ND870	ND870	ND870	ND800
BENZENE	ug/kg	5	ND870	ND870	200 J	1600
TRANS-1,3-DICHLOROPROPENE	ug/kg	5	ND870	ND870	ND870	ND800
BROMOFORM	ug/kg	5	ND870	ND870	ND870	ND800
4-METHYL-2-PENTANONE (METHYL I-Bu KETON)	ug/kg	10	ND1700	ND1700	ND1700	ND1600
2-HEXANONE	ug/kg	10	ND1700	ND1700	ND1700	ND1600
TETRACHLOROETHYLENE	ug/kg	5	ND870	ND870	ND870	ND800
1,1,2,2-TETRACHLORO-ETHANE	ug/kg	5	ND870	ND870	ND870	ND800
TOLUENE	ug/kg	5	230 J	250 J	320 J	1800
CHLOROBENZENE	ug/kg	5	ND870	ND870	ND870	1900
ETHYL BENZENE	ug/kg	5	ND870	270 J	320 J	3100
STYRENE	ug/kg	5	ND870	ND870	ND870	ND800
XYLENES	ug/kg	5	620 J	570 J	1900	20000
PHENOL	ug/kg	10	140000	150000	45000	7100 J
BIS (2-CHLOROETHYL) ETHER	ug/kg	10	ND23000	ND21000	ND19000	ND21000
2-CHLOROPHENOL	ug/kg	10	ND23000	ND21000	ND19000	ND21000
1,3-DICHLOROBENZENE	ug/kg	10	ND23000	ND21000	ND19000	ND21000

OCCIDENTAL CHEMICAL CORPORATION
ENVIRONMENTAL DATABASE SYSTEM

ND-Not Detected above CRDL

SCHRECK'S SCRAPYARD
SOIL SAMPLES

Special Codes: D - FIELD DUPLICATE

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			Sample Date:-------->	12/19/89	12/19/89	12/19/89	12/19/89
			Sample Description:->	SS 1	SS 1	SS 2	SS 3
			Special Code:-------->	D			
Analytes:	Units:	CRDL:					
1,4-DICHLOROBENZENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
BENZYL ALCOHOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
1,2-DICHLOROBENZENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2-METHYLPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
BIS (2-CHLORO-ISOPROPYL) ETHER	ug/kg	10		ND23000	ND21000	ND19000	ND21000
4-METHYLPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
N-NITROSODI-N-PROPYLAMINE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
HEXACHLOROETHANE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
NITROBENZENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
ISOPHORONE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2-NITROPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2,4-DIMETHYLPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
BENZOIC ACID	ug/kg	50		ND110000	ND110000	ND97000	ND100000
BIS (2-CHLOROETHOXY) METHANE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2,4-DICHLOROPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
1,2,4-TRICHLOROBENZENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
NAPHTHALENE	ug/kg	10		ND23000	ND21000	3200 J	ND21000
4-CHLOROANILINE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
HEXACHLOROBUTADIENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
4-CHLORO-3-METHYLPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2-METHYLNAPTHALENE	ug/kg	10		2500 J	2300 J	9600 J	7000 J
HEXACHLOROCYCLOPENTADIENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2,4,6-TRICHLOROPHENOL	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2,4,5-TRICHLOROPHENOL	ug/kg	50		ND110000	ND110000	ND97000	ND100000
2-CHLORONAPHTHALENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2-NITROANILINE	ug/kg	50		ND110000	ND110000	ND97000	ND100000
DIMETHYL PHTHALATE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
ACENAPHTHYLENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2,6-DINITROTOLUENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
3-NITROANILINE	ug/kg	50		ND110000	ND110000	ND97000	ND100000
ACENAPHTHENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
2,4-DINITROPHENOL	ug/kg	50		ND110000	ND110000	ND97000	ND100000
4-NITROPHENOL	ug/kg	50		ND110000	ND110000	ND97000	ND100000
DIBENZOFURAN	ug/kg	10		41000	74000	52000	29000
2,4-DINITROTOLUENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
DIETHYL PHTHALATE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
4-CHLOROPHENYLPHENYL ETHER	ug/kg	10		ND23000	ND21000	ND19000	ND21000
FLUORENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000

OCCIDENTAL CHEMICAL CORPORATION
ENVIRONMENTAL DATABASE SYSTEM

ND-Not Detected above CRDL

SCHRECK'S SCRAPYARD
SOIL SAMPLES

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			Sample Date:-------->	12/19/89	12/19/89	12/19/89	12/19/89
			Sample Description:->	SS 1	SS 1	SS 2	SS 3
			Special Code:-------->	D			
Analytes:	Units:	CRDL:					
4-NITROANILINE	ug/kg	50		ND110000	ND110000	ND97000	ND100000
4,6-DINITRO-O-CRESOL	ug/kg	50		ND110000	ND110000	ND97000	ND100000
N-NITROSODIPHENYLAMINE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
4-BROMOPHENYLPHENYL ETHER	ug/kg	10		ND23000	ND21000	ND19000	ND21000
HEXACHLOROBENZENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
PENTACHLOROPHENOL	ug/kg	50		ND110000	ND110000	ND97000	ND100000
PHENANTHRENE	ug/kg	10		2400 J	2900 J	4100 J	6800 J
ANTHRACENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
DI-N-BUTYL PHTHALATE	ug/kg	10		4500 BJ	ND21000	2200 BJ	2800 BJ
FLUORANTHENE	ug/kg	10		3900 J	4900 J	3600 J	7300 J
PYRENE	ug/kg	10		5800 J	6700 J	4600 J	6800 J
BUTYL BENZYL PHTHALATE	ug/kg	10		9300 J	ND21000	ND19000	ND21000
3,3'-DICHLORO-BENZIDINE	ug/kg	20		ND46000	ND43000	ND39000	ND41000
BENZO(A)ANTHRACENE	ug/kg	10		ND23000	2800 J	ND19000	3200 J
CHRYSENE	ug/kg	10		2700 J	3500 J	ND19000	3000 J
BIS (2-ETHYLHEXYL) PHTHALATE	ug/kg	10		17000 J	14000 J	11000 J	5500 J
DI-N-OCTYL PHTHALATE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
BENZO(B)FLUORANTHENE (3,4-BENZO)	ug/kg	10		2800 J	4100 J	4100 J	2700 J
BENZO(K)FLUORANTHENE	ug/kg	10		2600 J	1900 J	ND19000	2800 J
BENZO(A)PYRENE	ug/kg	10		2400 J	3000 J	ND19000	2700 J
INDENO (1,2,3-CD) PYRENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
DIBENZO (A,H) ANTHRACENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
BENZO(GHI)PERYLENE	ug/kg	10		ND23000	ND21000	ND19000	ND21000
PCB-1016 (AROCLOR 1016)	ug/kg	.50		ND3200	ND7700	ND6700	ND2800
PCB-1221 (AROCLOR 1221)	ug/kg	.50		ND3200	ND7700	ND6700	ND2800
PCB-1232 (AROCLOR 1232)	ug/kg	.50		ND3200	ND7700	ND6700	ND2800
PCB-1242 (AROCLOR 1242)	ug/kg	.50		ND3200	12000 N	16000 N	ND2800
PCB-1248 (AROCLOR 1248)	ug/kg	.50		ND3200	ND7700	ND6700	ND2800
PCB-1254 (AROCLOR 1254)	ug/kg	1		ND6500	11000 NJ	8300 NJ	3100 NJ
PCB-1260 (AROCLOR 1260)	ug/kg	1		ND6500	ND15000	ND13000	ND5700

OCCIDENTAL CHEMICAL CORPORATION

Report Date: 03/22/90

ENVIRONMENTAL DATABASE SYSTEM

ND-Not Detected above CROL

SCHREIX'S SCRAPYARD
WASTE SAMPLES

Special Codes:

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte was detected in the reagent blank, sample results not corrected.
H - Results are estimated, sample analyzed outside holding times.
N - Presumptively present, not confirmed by GC/MS.

	Sample Date:-------->	12/19/89	12/19/89	12/19/89
	Sample Description:->	WS 1	WS 2	WS 3
	Special Code:-------->			
Analytes:	Units:	CROL:			
CHLOROMETHANE	ug/kg	10	ND16000	ND2200	ND3500
BROMOMETHANE	ug/kg	10	ND16000	ND2200	ND3500
VINYL CHLORIDE	ug/kg	10	ND16000	ND2200	ND3500
CHLOROETHANE	ug/kg	10	ND16000	ND2200	ND3500
METHYLENE CHLORIDE	ug/kg	5	17000 B	2300 B	3300 B
ACETONE	ug/kg	10	ND16000	ND2200	ND3500
CARBON DISULFIDE	ug/kg	5	ND8200	ND1100	ND1700
1,1-DICHLOROETHYLENE	ug/kg	5	ND8200	ND1100	ND1700
1,1-DICHLOROETHANE	ug/kg	5	ND8200	ND1100	ND1700
1,2-DICHLOROETHENE (TOTAL)	ug/kg	5	ND8200	ND1100	ND1700
CHLOROFORM	ug/kg	5	1700 J	ND1100	420 J
1,2-DICHLOROETHANE	ug/kg	5	ND8200	ND1100	ND1700
METHYL ETHYL KETONE (2-BUTANONE)	ug/kg	10	ND16000	ND2200	ND3500
1,1,1-TRICHLORO-ETHANE	ug/kg	5	ND8200	ND1100	ND1700
CARBON TETRACHLORIDE	ug/kg	5	ND8200	ND1100	ND1700
VINYL ACETATE	ug/kg	10	ND16000	ND2200	ND3500
DICHLOROBROMOMETHANE	ug/kg	5	ND8200	ND1100	ND1700
1,2-DICHLOROPROPANE	ug/kg	5	ND8200	ND1100	ND1700
CIS-1,3-DICHLOROPROPENE	ug/kg	5	ND8200	ND1100	ND1700
TRICHLOROETHYLENE	ug/kg	5	ND8200	ND1100	ND1700
DIBROMOCHLORO-METHANE	ug/kg	5	ND8200	ND1100	ND1700
1,1,2-TRICHLORO-ETHANE	ug/kg	5	ND8200	ND1100	ND1700
BENZENE	ug/kg	5	1900 J	3300	4200
TRANS-1,3-DICHLOROPROPENE	ug/kg	5	ND8200	ND1100	ND1700
BROMOFORM	ug/kg	5	ND8200	ND1100	ND1700
4-METHYL-2-PENTANONE (METHYL I-Bu KETON)	ug/kg	10	ND16000	1100 J	ND3500
2-HEXANONE	ug/kg	10	ND16000	2100 J	ND3500
TETRACHLOROETHYLENE	ug/kg	5	ND8200	ND1100	ND1700
1,1,2,2-TETRACHLORO-ETHANE	ug/kg	5	ND8200	ND1100	ND1700
TOLUENE	ug/kg	5	7600 J	16000	20000
CHLOROBENZENE	ug/kg	5	ND8200	2200	2300
ETHYL BENZENE	ug/kg	5	11000	5700	7200
STYRENE	ug/kg	5	930000	ND1100	ND1700
XYLENES	ug/kg	5	1100	28000	30000
PHENOL	ug/kg	10	9200000	1900000	3100000
BIS (2-CHLOROETHYL) ETHER	ug/kg	10	ND5700000	ND640000	ND740000
2-CHLOROPHENOL	ug/kg	10	ND5700000	ND640000	ND740000
1,3-DICHLOROBENZENE	ug/kg	10	ND5700000	ND640000	ND740000

OCCIDENTAL CHEMICAL CORPORATION
ENVIRONMENTAL DATABASE SYSTEM

ND-Not Detected above CRDL

SCHRECK'S SCRAPYARD
WASTE SAMPLES

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			Sample Date:-------->	12/19/89	12/19/89	12/19/89
			Sample Description:->	WS 1	WS 2	WS 3
			Special Code:------->			
Analytes:	Units:	CRDL:				
1,4-DICHLOROBENZENE	ug/kg	10		ND570000	ND640000	ND740000
BENZYL ALCOHOL	ug/kg	10		ND570000	ND640000	ND740000
1,2-DICHLOROBENZENE	ug/kg	10		ND570000	ND640000	ND740000
2-METHYLPHENOL	ug/kg	10		240000 J	ND640000	ND740000
BIS (2-CHLORO-ISOPROPYL) ETHER	ug/kg	10		ND570000	ND640000	ND740000
4-METHYLPHENOL	ug/kg	10		300000 J	ND640000	ND740000
N-NITROSODI-N-PROPYLAMINE	ug/kg	10		ND570000	ND640000	ND740000
HEXACHLOROETHANE	ug/kg	10		ND570000	ND640000	ND740000
NITROBENZENE	ug/kg	10		ND570000	ND640000	ND740000
ISOPHORONE	ug/kg	10		ND570000	ND640000	ND740000
2-NITROPHENOL	ug/kg	10		ND570000	ND640000	ND740000
2,4-DIMETHYLPHENOL	ug/kg	10		310000 J	ND640000	ND740000
BENZOIC ACID	ug/kg	50		ND2900000	ND3200000	ND3700000
BIS (2-CHLOROETHOXY) METHANE	ug/kg	10		ND570000	ND640000	ND740000
2,4-DICHLOROPHENOL	ug/kg	10		ND570000	ND640000	ND740000
1,2,4-TRICHLOROBENZENE	ug/kg	10		ND570000	ND640000	ND740000
NAPHTHALENE	ug/kg	10		ND570000	ND640000	ND740000
4-CHLOROANILINE	ug/kg	10		ND570000	ND640000	ND740000
HEXACHLOROBUTADIENE	ug/kg	10		ND570000	ND640000	ND740000
4-CHLORO-3-METHYLPHENOL	ug/kg	10		ND570000	ND640000	ND740000
2-METHYLNAPTHALENE	ug/kg	10		ND570000	ND640000	ND740000
HEXACHLOROCYCLOPENTADIENE	ug/kg	10		ND570000	ND640000	ND740000
2,4,6-TRICHLOROPHENOL	ug/kg	10		ND570000	ND640000	ND740000
2,4,5-TRICHLOROPHENOL	ug/kg	50		ND2900000	ND3200000	ND3700000
2-CHLORONAPHTHALENE	ug/kg	10		ND570000	ND640000	ND740000
2-NITROANILINE	ug/kg	50		ND2900000	ND3200000	ND3700000
DIMETHYL PHTHALATE	ug/kg	10		ND570000	ND640000	ND740000
ACENAPHTHYLENE	ug/kg	10		ND570000	ND640000	ND740000
2,6-DINITROTOLUENE	ug/kg	10		ND570000	ND640000	ND740000
3-NITROANILINE	ug/kg	50		ND2900000	ND3200000	ND3700000
ACENAPHTHENE	ug/kg	10		ND570000	ND640000	ND740000
2,4-DINITROPHENOL	ug/kg	50		ND2900000	ND3200000	ND3700000
4-NITROPHENOL	ug/kg	50		ND2900000	ND3200000	ND3700000
DIBENZOFURAN	ug/kg	10		5700000	1200000	4900000
2,4-DINITROTOLUENE	ug/kg	10		ND570000	ND640000	ND740000
DIETHYL PHTHALATE	ug/kg	10		ND570000	ND640000	ND740000
4-CHLOROPHENYLPHENYL ETHER	ug/kg	10		ND570000	ND640000	ND740000
FLUORENE	ug/kg	10		ND570000	ND640000	ND740000

OCCIDENTAL CHEMICAL CORPORATION
ENVIRONMENTAL DATABASE SYSTEM

ND-not Detected above CRDL

SCHRECK'S SCRAPYARD
WASTE SAMPLES

Special Codes:
Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte was detected in the reagent blank, sample results not corrected.
H - Results are estimated, sample analyzed outside holding times.
N - Presumptively present, not confirmed by GC/MS.

Sample Date:-------->	12/19/89	12/19/89	12/19/89
Sample Description:->	WS 1	WS 2	WS 3
Special Code:-------->			

Analytes:	Units:	CRDL:			
4-NITROANILINE	ug/kg	50	ND2900000	ND3200000	ND3700000
4,6-DINITRO-O-CRESOL	ug/kg	50	ND2900000	ND3200000	ND3700000
N-NITROSODIPHENYLAMINE	ug/kg	10	ND570000	ND640000	ND740000
4-BROMOPHENYLPHENYL ETHER	ug/kg	10	ND570000	ND640000	ND740000
HEXACHLOROBENZENE	ug/kg	10	ND570000	ND640000	ND740000
PENTACHLOROPHENOL	ug/kg	50	ND2900000	ND3200000	ND3700000
PHENANTHRENE	ug/kg	10	ND570000	ND640000	ND740000
ANTHRACENE	ug/kg	10	ND570000	ND640000	ND740000
DI-N-BUTYL PHTHALATE	ug/kg	10	ND570000	120000 J	ND740000
FLUORANTHENE	ug/kg	10	ND570000	ND640000	ND740000
PYRENE	ug/kg	10	ND570000	ND640000	ND740000
BUTYL BENZYL PHTHALATE	ug/kg	10	ND570000	ND640000	ND740000
3,3'-DICHLORO-BENZIDINE	ug/kg	20	ND1100000	ND1300000	ND1500000
BENZO(A)ANTHRACENE	ug/kg	10	ND570000	ND640000	ND740000
CHRYSENE	ug/kg	10	ND570000	ND640000	ND740000
BIS (2-ETHYLHEXYL) PHTHALATE	ug/kg	10	ND570000	ND640000	ND740000
DI-N-OCTYL PHTHALATE	ug/kg	10	ND570000	ND640000	ND740000
BENZO(B)FLUORANTHENE (3,4-BENZO)	ug/kg	10	ND570000	ND640000	ND740000
BENZO(K)FLUORANTHENE	ug/kg	10	ND570000	ND640000	ND740000
BENZO(A)PYRENE	ug/kg	10	ND570000	ND640000	ND740000
INDENO (1,2,3-CD) PYRENE	ug/kg	10	ND570000	ND640000	ND740000
DIBENZO (A,H) ANTHRACENE	ug/kg	10	ND570000	ND640000	ND740000
BENZO(GHI)PERYLENE	ug/kg	10	ND570000	ND640000	ND740000
PCB-1016 (AROCLOR 1016)	ug/kg	.50	ND6800	ND1500	ND3600
PCB-1221 (AROCLOR 1221)	ug/kg	.50	ND6800	ND1500	ND3600
PCB-1232 (AROCLOR 1232)	ug/kg	.50	ND6800	ND1500	ND3600
PCB-1242 (AROCLOR 1242)	ug/kg	.50	12000 N	560 NJ	5100 N
PCB-1248 (AROCLOR 1248)	ug/kg	.50	ND6800	ND1500	ND3600
PCB-1254 (AROCLOR 1254)	ug/kg	1	7100 NJ	ND3000	3300 NJ
PCB-1260 (AROCLOR 1260)	ug/kg	1	ND14000	ND3000	ND7100

APPENDIX B

PHOTOGRAPHS

Photograph 1

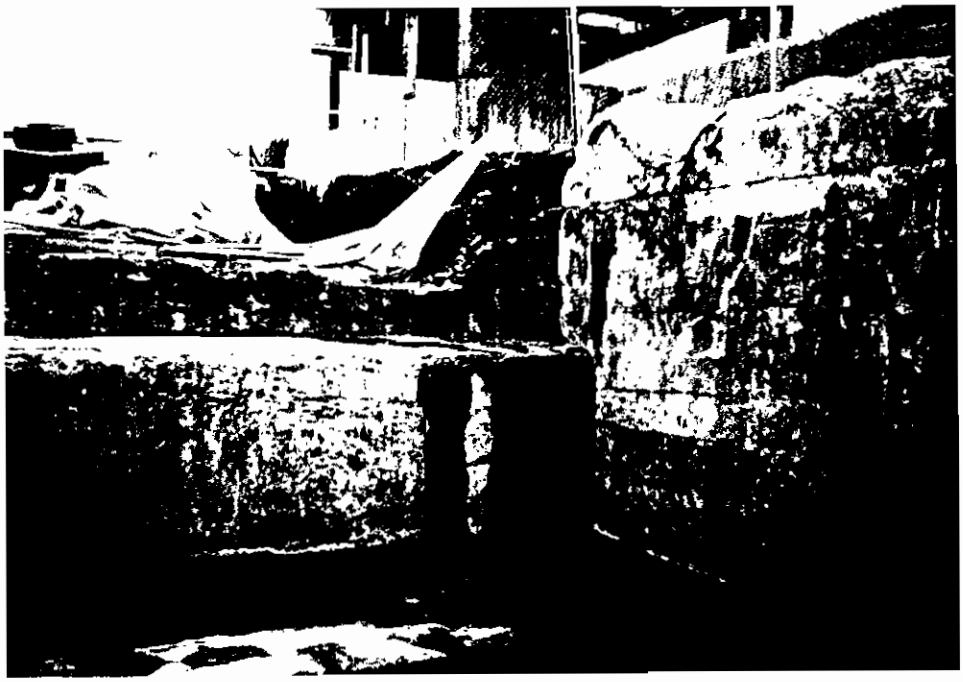
Excavation for the dewatering sump on the southeast portion of the Pit.
View is from south.

Photograph 2

View of partly excavated Pit from west.
Note ledge in foreground and the three piers.

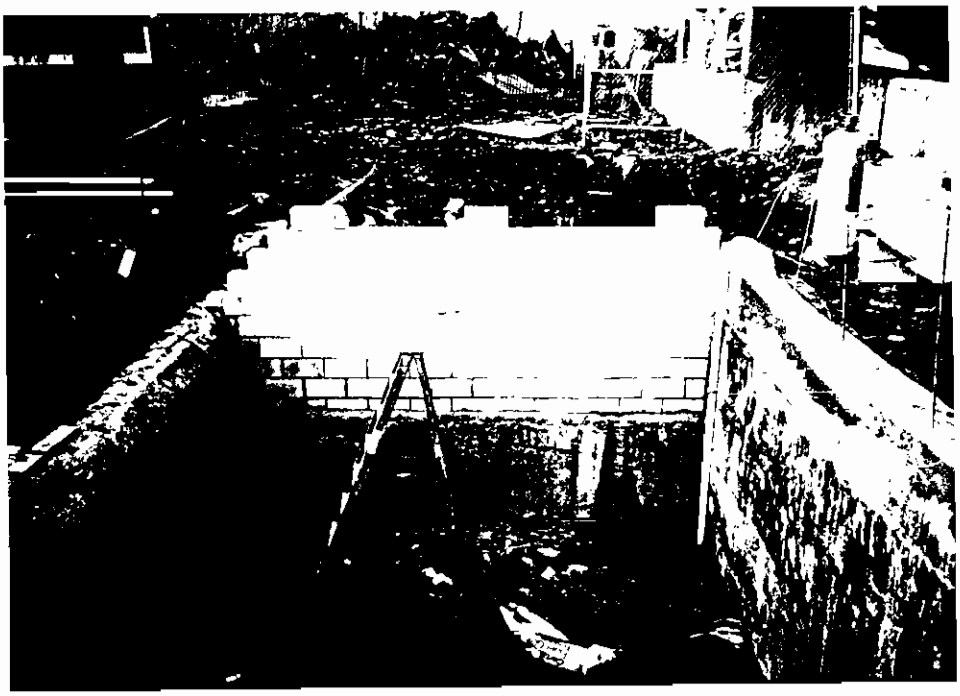
Photograph 3

The Pit completely excavated. Note the three piers and south wall of Pit.
View is from northwest.



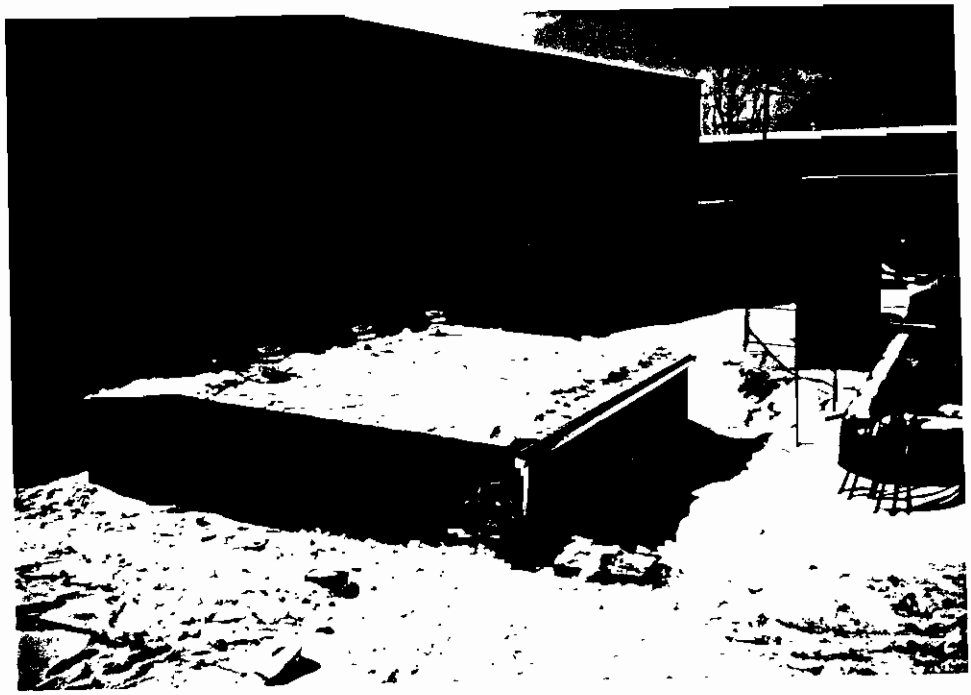
Photograph 4

This photo was taken from inside the Pit looking west.
Note the block west wall, sump location and ledge.



Photograph 5

This photo shows the location of the new west wall and concrete cap poured on the uneven existing walls. View from east.



Photograph 6

This photo shows the completed roof structure over the Pit. View is from the east.

APPENDIX C

SUMMARY OF CHEMICAL ANALYSES

SUMMARY OF WASTE WATER SAMPLES
SCHRECK'S SCRAPYARD

SAMPLE IDENTIFICATION	TANKER NUMBER	VOLUME IN TANKER	SAMPLE DATE	SAMPLE LOCATION
SSY-TS-1 A,B,C	118	+/- 6200	1/24/91	Schreck's
1 F SCHRECK	118	+/- 6200	1/31/91	OCC Plant
1 E SCHRECK	118	+/- 6200	1/31/91	OCC Plant
SSY-TS-2 A,B,C	109	+/- 781	1/29/91	Schreck's
SSY-TS-3 A,B,C	109	+/- 4750	3/6/91	Schreck's

INDUSTRIAL WASTE REMOVAL AND SOIL REMOVAL ACTION
SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK
RESULTS OF SEMI-VOLATILE ORGANIC ANALYSIS
WASTE WATER SAMPLES

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quanitation level.
B - Ansiyte was detected in the reagent blank, sample results not corrected.
D - Identified all compounds in an analysis at a secondary dilution factor.
ND - Not Detected at or above.

ANALYTES	CONTRACT REQUIRED QUANTITATION LIMITS ug/kg	TANKER NO. 118 1ESCHRECK (5)	1FSCHRECK (3)	TANKER NO. 109 SSY-TS-2
Phenol	10	50000 D (1)	650000 D(1)	1300000 BD(1)
bis (2-Chloroethyl) Ether	10	ND 25	ND 1400	ND 120
2-Chlorophenol	10	ND 25	ND 1400	100 J
1,3-Dichlorobenzene	10	ND 25	ND 1400	ND 120
1,4-Dichlorobenzene	10	ND 25	ND 1400	ND 120
Benzyl Alcohol	10	ND 25	ND 1400	ND 120
1,2-Dichlorobenzene	10	ND 25	ND 1400	ND 120
2-Methylphenol	10	ND 25	3600	ND 120000 (1)
bis (2-Chloroisopropyl) Ether	10	ND 25	ND 1400	ND 120
4-Methylphenol	10	ND 25	3700	ND 120000 (1)
N-nitroso-Di-n-Propylamine	10	ND 25	ND 1400	ND 120
Hexachloroethane	10	ND 25	ND 1400	ND 120
Nitrobenzene	10	ND 25	ND 1400	ND 120
Isophorone	10	ND 25	ND 1400	ND 120
2-Nitrophenol	10	ND 25	ND 1400	ND 120
2,4-Dimethylphenol	10	ND 25	1300 J	1300
Benzoic Acid	50	ND 120	ND 7200	ND 620
bis (2-Chloroethoxy) Methane	10	ND 25	ND 1400	ND 120
2,4-Dichlorophenol	10	ND 25	270 J	930
1,2,4-Trichlorobenzene	10	ND 25	ND 1400	ND 120
Naphthalene	10	ND 25	ND 1400	77 J
4-Chloroaniline	10	ND 25	ND 1400	ND 120
Hexachlorobutadiene	10	ND 25	ND 1400	ND 120
4-Chloro-3-Methylphenol	10	ND 25	ND 1400	ND 120
2-Methylnaphthalene	10	ND 25	ND 1400	ND 120
Hexachlorocyclopentadiene	10	ND 25	ND 1400	ND 120
2,4,6-Trichlorophenol	10	4900 DJ (2)	5400	ND 120
2,4,5-Trichlorophenol	50	ND 6200 (2)	ND 7200	ND 620000 (1)
2-Chloronaphthalene	10	ND 25	ND 1400	ND 120
2-Nitroaniline	50	ND 120	ND 7200	ND 620
Dimethyl Phthalate	10	ND 25	ND 1400	ND 120
Acenaphthylene	10	ND 25	ND 1400	ND 120
2,6-Dinitrotoluene	10	ND 25	ND 1400	ND 120
3-Nitroaniline	50	ND 120	ND 7200	ND 620
Acenaphthene	10	ND 25	ND 1400	ND 120
2,4-Dinitrophenol	50	ND 120	ND 7200	ND 620
4-Nitrophenol	50	ND 120	ND 7200	ND 620
Dibenzofuran	10	5600 DJ (2)	1200 J	890
2,4-Dinitrotoluene	10	ND 25	ND 1400	ND 120
Diethylphthalate	10	ND 25	ND 1400	ND 120
4-Chlorophenyl-phenylether	10	ND 25	ND 1400	ND 120
Fluorene	10	ND 25	ND 1400	ND 120
4-Nitroaniline	50	ND 120	ND 7200	ND 620
4,6-Dinitro-2-Methylphenol	50	ND 120	ND 7200	ND 620
N-Nitrosodiphenylamine (1)	10	ND 25	ND 1400	ND 120
4-Bromophenyl-phenylether	10	ND 25	ND 1400	ND 120
Hexachlorobenzene	10	ND 25	ND 1400	ND 120
Pentachlorophenol	50	ND 120	ND 7200	ND 620
Phenanthrene	10	ND 25	ND 1400	ND 120
Anthracene	10	ND 25	ND 1400	ND 120
Di-n-Butylphthalete	10	ND 25	ND 1400	ND 120

INDUSTRIAL WASTE REMOVAL AND SOIL REMOVAL ACTION
SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK
RESULTS OF SEMI-VOLATILE ORGANIC ANALYSIS
WASTE WATER SAMPLES

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte wae detected in the reagent blank, sample results not corrected.
D - Identified all compounds in an analysis at a secondary dilution factor.
ND - Not Detected at or ebove.

	CONTRACT REQUIRED QUANTITATION LIMITS	TANKER NO. 118		TANKER NO. 109
ANALYTES	ug/kg	1ESCHRECK (5)	1FSCHRECK (3)	SSY-TS-2
Fluoranthene	10	ND 25	ND 1400	ND 120
Pyrene	10	ND 25	ND 1400	ND 120
Butylbenzylphthalate	10	ND 25	ND 1400	ND 120
3,3-Dichlorobenzidine	20	ND 50	ND 2900	ND 120
Benzo(a)Anthracene	10	ND 25	ND 1400	ND 250
Chrysene	10	ND 25	ND 1400	ND 120
Bis(2-Ethylhexyl)Phthalate	10	ND 25	ND 1400	ND 120
Di-n-Octyl Phthalate	10	ND 25	ND 1400	ND 120
Benzo(b)Fluoranthene	10	ND 25	ND 1400	ND 120
Benzo(k)Fluoranthene	10	ND 25	ND 1400	ND 120
Benzo(a)Pyrene	10	ND 25	ND 1400	ND 120
Indeno(1,2,3-cd)Pyrene	10	ND 25	ND 1400	ND 120
Dibenz(a,h)Anthracene	10	ND 25	ND 1400	ND 120
Benzo(g,h,i)Perylene	10	ND 25	ND 1400	ND 120

(1) Dilution Factor of 10,000
(2) Dilution Factor of 1,000
(3) Dilution Factor of 100
(4) Dilution Factor of 10
(5) Dilution Factor of 2

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INDUSTRIAL WASTE REMOVAL AND SOIL REMOVAL ACTION
SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK
RESULTS OF SEMI-VOLATILE ORGANIC ANALYSIS
SOIL SAMPLES

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte was detected in the reagent blank, sample results not corrected.
D - Identified all compounds in an analysis at a secondary dilution factor.
ND - Not Detected at or above.

ANALYTES	CONTRACT REQUIRED QUANTITATION LIMITS ug/kg	SSY-ES-1E (3)	SSY-ES-1W (3)	SSY-ES-3E (3)	SSY-ES-3W (3)	SSY-ES-5E (3)	SSY-ES-5W (3)	SSY-ES-7W (3)	SSY-ES-7W DUP (3)	SSY-ES-8 (3)
Phenol	330	2900000 D(4)	ND 49000	ND 47000	12000 J	9000000 D(1)	370000	710000	430000 DJ(4)	14000000 D(5)
bis (2-Chloroethyl) Ether	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2-Chlorophenol	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
1,3-Dichlorobenzene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
1,4-Dichlorobenzene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Benzyl Alcohol	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
1,2-Dichlorobenzene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2-Methylphenol	330	17000 J	ND 49000	ND 47000	ND 50000	55000	ND 48000	ND 51000	ND 49000	38000 J
bis (2-Chloroisopropyl) Ether	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
4-Methylphenol	330	20000 J	ND 49000	ND 47000	ND 50000	58000	ND 48000	ND 51000	ND 49000	ND 47000
N-nitroso-Di-n-Propylamine	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Hexachloroethane	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Nitrobenzene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Isophorone	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2-Nitrophenol	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2,4-Dimethylphenol	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	13000 J
Benzoic Acid	1600	2700 J	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
bis (2-Chloroethoxy) Methane	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2,4-Dichlorophenol	330	ND 50000	ND 49000	ND 47000	ND 50000	6600 J	ND 48000	ND 51000	ND 49000	ND 47000
1,2,4-Trichlorobenzene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Naphthalene	330	ND 50000	ND 49000	ND 44000	10000 J	4600 J	6500 J	5400 J	5600 J	5100 J
4-Chloroaniline	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Hexachlorobutadiene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
4-Chloro-3-Methylphenol	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2-Methylnaphthalene	330	ND 50000	ND 49000	56000	20000 J	5800 J	8100 J	7600 J	4400 J	4000 J
Hexachlorocyclopentadiene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2,4,6-Trichlorophenol	330	6600 J	ND 49000	ND 47000	ND 50000	28000 J	ND 48000	ND 51000	ND 49000	ND 47000
2,4,5-Trichlorophenol	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 59000
2-Chloronaphthalene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2-Nitroaniline	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
Dimethyl Phthalate	330	ND 50000	ND 49000	ND 47000	ND 50000	6000	ND 48000	ND 51000	ND 49000	ND 47000
Acenaphthylene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2,6-Dinitrotoluene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
3-Nitroaniline	330	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
Acenaphthene	330	ND 50000	ND 49000	ND 47000	2900 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
2,4-Dinitrophenol	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
4-Nitrophenol	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000

INDUSTRIAL WASTE REMOVAL AND SOIL REMOVAL ACTION
SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK
RESULTS OF SEMI-VOLATILE ORGANIC ANALYSIS
SOIL SAMPLES

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte was detected in the reagent blank, sample results not corrected.
D - Identified all compounds in an analysis at a secondary dilution factor.
ND - Not Detected at or above.

ANALYTES	CONTRACT REQUIRED QUANTITATION LIMITS ug/kg	SSY-ES-1E (3)	SSY-ES-1W (3)	SSY-ES-3E (3)	SSY-ES-3W (3)	SSY-ES-5E (3)	SSY-ES-5W (3)	SSY-ES-7W (3)	SSY-ES-7W DUP (3)	SSY-ES-8 (3)
Dibenzofuran	330	780000 D(4)	ND 49000	58000	170000	10000000 D(1)	3200000 E	1600000 D(4)	1100000 D(4)	6900000 D(5)
2,4-Dinitrotoluene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Diethylphthalate	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
4-Chlorophenyl-phenylether	330	ND 50000	ND 49000	ND 47000	ND 50000	18000 J	5000 J	ND 51000	ND 49000	ND 47000
Fluorene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
4-Nitroaniline	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
4,6-Dinitro-2-Methylphenol	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
N-Nitrosodiphenylamine	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
4-Bromophenyl-phenylether	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Hexachlorobenzene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Pentachlorophenol	1600	ND 240000	ND 240000	ND 230000	ND 240000	ND 250000	ND 230000	ND 250000	ND 240000	ND 230000
Phenanthrene	330	ND 50000	ND 49000	16000 J	16000 J	7300 J	5900 J	ND 51000	ND 49000	ND 47000
Anthracene	330	ND 50000	ND 49000	ND 47000	4100 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Di-n-Butylphthalate	330	ND 50000	ND 49000	38000 J	ND 50000	ND 51000	ND 48000	13000 J	ND 49000	ND 47000
Fluoranthene	330	ND 50000	ND 49000	6800 J	18000 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Pyrene	330	ND 50000	ND 49000	5600 J	17000 J	ND 51000	ND 48000	6600 J	6400 J	ND 47000
Butylbenzylphthalate	330	ND 50000	6200 J	15000 J	3500 J	ND 51000	ND 48000	ND 51000	21000 J	ND 47000
3,3-Dichlorobenzidine	660	ND 99000	ND 98000	ND 93000	ND 100000	ND 100000	ND 96000	ND 100000	ND 99000	ND 94000
Benzo(a)Anthracene	330	ND 50000	ND 49000	ND 47000	11000 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Chrysene	330	ND 50000	ND 49000	ND 47000	9800 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Bis(2-Ethylhexyl)Phthalate	330	10000 J	8700 J	28000 J	6800 J	ND 51000	34000 J	9200 J	8400 J	ND 47000
Di-n-Octyl Phthalate	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Benzo(b)Fluoranthene	330	ND 50000	ND 49000	ND 47000	10000 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Benzo(k)Fluoranthene	330	ND 50000	ND 49000	ND 47000	4100 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Benzo(a)Pyrene	330	ND 50000	ND 49000	ND 47000	8700 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Indeno(1,2,3-cd)Pyrene	330	ND 50000	ND 49000	ND 47000	4000 J	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Dibenz(a,h)Anthracene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000
Benzo(g,h,i)Perylene	330	ND 50000	ND 49000	ND 47000	ND 50000	ND 51000	ND 48000	ND 51000	ND 49000	ND 47000

(1) Dilution Factor of 100
(2) Dilution Factor of 10
(3) Dilution Factor of 2
(4) Dilution Factor of 20
(5) Dilution Factor of 50

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INDUSTRIAL WASTE REMOVAL AND SOIL REMOVAL ACTION
SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK
RESULTS OF PCB ANALYSIS
SOIL SAMPLES

Data Qualifiers: J - Identified using CLP criteria at a concentration below the method specified quantitation level.
B - Analyte was detected in the resgent blank, sample results not corrected.
D - Identified all compounds in an analysis at a secondary dilution factor.
ND - Not Detected at or above.

ANALYTES	SSY-ES-1E (2)	SSY-ES-1W (3)	SSY-ES-3E (3)	SSY-ES-3W (3)	SSY-ES-5E (1)	SSY-ES-5W (3)	SSY-ES-7W (3)	SSY-ES-7W DUP (3)	SSY-ES-8 (1)
Aroclor 1016	ND 3000	ND 6700	ND 7600	ND 1500	ND 1600	ND 1500	ND 7100	ND 8200	ND 1600
Aroclor 1221	ND 3000	ND 6700	ND 7600	ND 1500	ND 1600	ND 1500	ND 7100	ND 8200	ND 1600
Aroclor 1232	ND 3000	ND 6700	ND 7600	ND 1500	ND 1600	ND 1500	ND 7100	ND 8200	ND 1600
Aroclor 1242	18000	50000	47000	3100	13000	5600	66000	80000	8600
Aroclor 1248	ND 3000	ND 6700	ND 7600	ND 1500	ND 1600	ND 1500	ND 7100	ND 8200	ND 1600
Aroclor 1254	15000	20000	6700 J	3900	6900	4700	ND 14000	ND 16000	4500
Aroclor 1260	ND 6000	ND 13000	ND 15000	ND 3000	ND 3100	ND 2900	ND 14000	ND 16000	ND 3399

(1) Dilution Factor of 1
(2) Dilution Factor of 2
(3) Dilution Factor of 3

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APPENDIX D

Community Air Monitoring Plan (CAMP)

New York State Department of Health
Generic Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical-specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH. Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan
Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (VOCs) and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate NYSDEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while

opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

  All 15-minute readings must be recorded and be available for State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to

indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m3 above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m3 of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for State (DEC and DOH) personnel to review.

June 20, 2000

Appendix E

Generic Health and Safety Plan

(Note: this does supersede the HASP that has been specifically developed for this site or facility)

1.0 SITE HEALTH AND SAFETY PLAN SIGNATURE PAGE

Prior to the initiation of field activities, I have read, and have been given an opportunity to question the contents of this Site Health and Safety Plan. By my signature, I certify that I understand, and agree to comply with the information and directions set forth in this Plan. I further certify that I am in full compliance with OSHA 29 CFR 1910.120 in regards to training and medical monitoring requirements.

SITE PERSONNEL:

Printed Name	Title	Signature	Date

2.0 SITE DESCRIPTION

The Schreck's Scrapyard Site consists of a single parcel at 55 Schenck Street in the City of North Tonawanda, Niagara County, New York. The site occupies an area of approximately 1.5 acres in a mixed light industrial, commercial and residential neighborhood. The site is bounded on the north by Schenck Street and the Smurfit Stone box making facility, on the east by railroad tracks and an empty lot, on the south by a warehouse owned by Idek, LLC, and on the west by a warehouse utilized by Smurfit Stone. Although no residential properties are adjacent to the site, a dense residential neighborhood lies approximately one block to the east.

Prior to remediation, the site contained four significant structures; a cinder block office building, a garage, the frame of an abandoned bailer machine with a concrete foundation, and an abandoned press pit. The site's soil was oily and essentially void of vegetation. Miscellaneous scrap was found throughout the site. The surface topography of the site is relatively flat, with an elevation of approximately 573 feet above mean sea level (amsl).

After the completion of remediation the surface of the Schreck's Scrapyard Site is now covered with clean soil utilized as backfill during the remediation of the site. The site was cleaned to meet site specific clean-up standards for PCBs (10 ppm) and also contains residual levels of various metals, PAHs and petroleum products.

3.0 SITE PERSONNEL SAFETY

3.1 Assignment of Responsibilities

The Project Manager (and field operations leader, if different) is responsible for ensuring that all provisions specified in this plan are appropriately implemented on the project. The Project Manager shall identify and communicate anticipated health and safety requirements to any subcontractor(s) as early as possible.

The Site safety officer (SSO) is responsible for the field coordination of the project health and safety plan and other aspects of the MECX health and safety program. Among the specific duties of the SSO are: hazard assessment, air monitoring, evaluation of the personal protective equipment program, and consulting with the health and safety director on matters related to the project. The SSO reports to the Project Manager, and has authority to stop work when necessary to guarantee employee well-being.

Project team members will be familiar with the contents of this Health & Safety Plan and the project Work Plan; and will observe all specifications set forth within those plans, and with further direction they may receive from time to time. No employee may, for any reason, perform an act, or create a condition that may cause harm to themselves, co-workers, or third parties. All employees shall immediately report unsafe conditions to the SSO.

3.2 Key Project Health and Safety Personnel

The following personnel will have the primary responsibility of ensuring that all provisions set forth in this health and safety plan are implemented on the project.

Title (Company)	Name	Telephone Number
Project Manager		
Site Safety Officer		
Plant Manager		

A complete list of emergency phone numbers is provided in Table 1.

3.3 Other Project Personnel

_____ personnel will conduct all field activities in accordance with this Site HASP. Additionally,
Subcontractors will be required to conduct all on-site activities under the direction of the Project Manager and SSO and under the guidelines set forth in this HASP, unless the subcontractor’s own health and safety program contains a more stringent set of guidelines.

3.4 Medical Surveillance

All personnel who may be required to enter a designated exclusion zone or decontamination zone (see Section 6.3.1) shall have successfully completed a pre-placement or periodic/update physical examination in accordance with requirements.

All subcontractor personnel who, because of their job assignments, may incur exposures to the hazardous materials present at the job site must have successfully completed a physical examination that complies with set forth in 29 CFR 1910.120.

3.5 Employee Training and Indoctrination

All personnel assigned to this project shall have completed, at a minimum, the appropriate mandatory formal training courses, which include 40 hours of initial training, and 8 hours annual refresher training; plus three days supervised on-site training for hazardous waste workers. An additional 8 hours training is required for supervisors. Local regulations shall also be consulted to identify alternate or additional requirements.

All subcontractor personnel shall have completed minimum training in compliance with 1910.120, as appropriate, or requirements as specified by other regulations.

Daily safety meetings, detailing specific hazards of the work to be performed and safety precautions and procedures for each task, shall be conducted by the SSO at the beginning of each shift and shall be documented in writing in the field log and copied to the SSO or Project Manager on a weekly basis.

4.0 HAZARD EVALUATION

4.1 Hazard Checklist

Evaluate Tasks from the following checklist for potential hazards.

PHYSICAL

Potential Hazard	**Y/N**	**Potential Hazard**	**Y/N**
Slip and Fall		Elevated Work Space	
Thermal Stress		Vehicular Traffic	
Fire		Manual Lifting	
Noise		Moving Machinery	

CHEMICAL

Potential Hazard	**Y/N**	**Potential Hazard**	**Y/N**
Corrosives		Systemic Poisons	
Irritants		Sensitizers	
Oxidizers			

BIOLOGICAL

Potential Hazard	**Y/N**	**Potential Hazard**	**Y/N**
Poisonous Plants		Infectious Materials	
Insects/Spiders		Animals	

4.2 Physical Hazards

4.2.1 Slips and Falls

Working outside and around equipment poses additional slip and fall hazards to field personnel. Injuries can result from falling, tripping over uneven ground or equipment, and slipping on wet or icy surfaces. Always be aware of your surroundings and follow standard precautions for safe work practice to avoid slip and fall hazards.

4.2.2 Thermal Stress

4.2.2.1 Heat Stress

Heat stress may occur as a result of heavy exertion in heat, inadequate replenishment of fluids, poor physical condition, and individual susceptibility. Impermeable protective clothing (i.e., Tyvek) can also be a factor since these materials reduce the body's ability to dissipate heat.

The usual symptoms of heat exhaustion include pale, cool, moist skin; sweating; dilated pupils; headache; nausea; dizziness; and possibly vomiting.

4.2.2.2 Heat Stroke

The most serious heat-related illness is heat stroke. Heat stroke is a medical emergency, and immediate medical treatment must be obtained. Failure of the body's sweat response occurs, leading to a rapid accelerated increase in body core temperature. The victim usually has hot, dry, red skin, and if conscious, is confused; convulsions may be noted. The victim must be cooled immediately. Heat stroke is fatal if treatment is incomplete or delayed.

As with any illness, the best cure is prevention. Heat stress is most likely early in the summer, prior to acclimatization. Full acclimatization takes 5 to 7 consecutive days of controlled, progressively longer exertion in heat. Individual physical conditioning, pre-existing illness, and use of alcohol and certain over-the-counter prescriptions contribute significantly to the potential for heat stress.

To reduce the potential for heat related illnesses; the following precautions will be taken:

- Field personnel will have access to an adequate supply of cold potable water to replenish lost fluids.
- Employees required to wear impermeable clothing will be allowed to take periodic breaks in which they will have the opportunity to remove the protective garments.
- If the temperature in the shade exceeds 80 degrees (0F), field personnel without impermeable clothing may take a break and measure the pulse rate every two hours. Field personnel with impermeable clothing will measure their pulse rate every hour. If the pulse rate is greater than 110 beats/minute within the first minute of the break, and/or greater than 80 beats/minute for a pulse measurement obtained within three minutes of the first measurement, then the working period will be reduced by one third. If the temperature in the shade exceeds 85 0F, the same procedure may be followed every 90 minutes for personnel without impermeable clothing and every 30 minutes for personnel wearing impermeable clothing. If the temperature in the shade exceeds 90 0F, the same procedure may be followed every 60 minutes for personnel without impermeable clothing and every 15 minutes for personnel wearing impermeable clothing. Working and monitoring periods can be lengthened if the workers demonstrate acclimation to the heat after at least three passing monitoring events.

4.2.2.3 Cold Weather Exposure

Cold weather exposure resulting in frostbite and/or hypothermia can be a serious hazard during the winter months. During cold weather, the body can suffer excessive heat loss through low ambient temperatures, wind, and moisture, especially if the person is not appropriately dressed for conditions.

The first symptoms of frostbite include slightly flushed skin. The skin color changes to white or yellow and finally grayish-blue. Frostbitten skin feels cold and numb. Pain may be associated with the early stages of frostbite, but the employee may become unaware of the condition as it progresses.

The signs and symptoms of hypothermia may include shivering, dizziness, numbness, weakness, drowsiness, and impaired senses. A lack of motor skills may also become apparent.

To avoid potential injuries from frostbite or hypothermia, the following precautions will be taken:

- Appropriate cold weather gear (thermal clothing, etc.) will be supplied to field personnel.
- Field personnel will be allowed to take periodic breaks to warm up and to replenish the body with potable water or warm drinks.

4.2.2.4 Burns

Due to the exothermic nature of the ISCO process, the well heads can become hot. In addition, other equipment that may be utilized on Site (generators, lights, etc.) may also contain surfaces hot enough to cause burns. Field personnel will be instructed as to the potential for burn hazards at the Site. MECX personnel should use caution when working in the vicinity of these hazards.

4.2.3 Noise

Field personnel may be exposed to excessive noise levels, especially in the vicinity of heavy equipment or industrial machinery. Field personnel will be required to wear earplugs during tasks that may permit exposure to potentially dangerous levels of noise.

4.2.4 Vehicular Traffic

Project facilities and field work often include the interaction of personnel and moving vehicles or equipment. To avoid the potential for injuries associated with vehicular traffic, the following precautions will be taken:

- Field personnel are required to follow facility rules regarding vehicular traffic/employee safety.
- Field personnel should wear outer clothing that makes them visible in the surrounding conditions. Orange vests or other highly visible garments may be required in certain high traffic areas.
- Heavy equipment or vehicles used on the Site will be equipped with the appropriate horns or alarms to make others aware of their presence.
- If required, the work area will be secured with highly visible barricades, barrels, or similar traffic control devices and the work area will be designated by yellow caution tape. If required, additional devices such as traffic signs may be utilized.

4.2.5 Manual Lifting

Manual lifting is common to this type of activity; and is a potential source of serious injury. The common concern about lifting is causing an injury to the back; but improper lifting techniques can also injure the neck, shoulder, knee, and hands. Site conditions (poor footing, inadequate lighting, and weather) can compound the hazards associated with lifting. To minimize potential hazards from manual lifting, follow the guidance presented below:

- Prior to lifting, size up the job; look at the weight, size, shape, and condition of the object to be lifted, and decide if you can lift it unassisted.
- Obtain help if the lift will exceed your abilities. When lifting/carrying an object with another person, the weight should be evenly distributed, and movements coordinated.
- If you are lifting an object on your own, place your feet close to the object, get a good grip (palm of the hand is stronger than fingers, watch for sharp edges, nails, splinters), and straighten your back.
- Keeping your back straight, keep the object close to your body, and use the muscles in your legs to lift the object. Complete the lift before turning, and turn by repositioning your feet, never twist while lifting or carrying an object.
- Reverse the procedure when setting the object down, and keep your fingers clear of pinch points.
- If you do injure yourself lifting, or suspect you may have, report the injury immediately, do not attempt self-treatment, or ignore the problem.

4.2.6 Chemical Handling

All chemicals that are delivered for the project are to be stored in a designated and secured chemical storage area. Incompatible materials will be segregated. Personnel should take care to handle all chemicals with the utmost care.

4.3 Chemical Hazards

4.3.1 Contaminants of Concern

A list of compounds detected at the Site during previous investigations and remediation includes petroleum compounds, PAHs, PCBs & solvents.

4.4 Biological Hazards

Working outside can provide exposure to biological hazards including poisonous plants, infectious materials, spiders or insects, and animals. Though these types of hazards are usually minimal, their potential still exists. Field personnel should remain aware of the potential for biological hazards and take the necessary precautions if and when these types of hazards arise.

5.0 GENERAL WORK PROCEDURES

5.1 Hazard Control Measures

Control of hazards through application of behavioral and engineering controls is the most desirable course of action.

At the beginning of the project, each work shift, and as often as necessary to ensure safety, a competent person shall conduct an area survey to locate work place hazards and determine appropriate safety control measures.

5.2 Employee Health and Safety Rules

The following general safety rules are to be observed at all project sites.

- At least one copy of this HASP shall be available at the work Site.
- Horseplay, practical joking, or any other actions that jeopardize safety will result in dismissal of employee from the Site.
- Running is not permitted.
- Alcoholic beverages and non-medicinal drugs are not permitted at the project Site.
- Employees suspected of being under the influence of alcohol or drugs will be removed from the Site.
- Radios (excepting two-way radios), tape players or other forms of entertainment devices are prohibited in the authorized zone.
- All activities will be performed in such a manner to prevent the disbursement or release of contaminants.
- Contaminated protective equipment, such as respirators, hoses, boots, etc., shall not be removed from the regulated area until it has been cleaned, or properly packaged and labeled.
- Legible and understandable precautionary labels shall be affixed prominently to containers of contaminated scrap, waste, debris, and clothing.
- Removal of contaminated soil from protective clothing or equipment by blowing, shaking or any other means which disperse contaminants into the air is prohibited.
- Transportation and disposal of contaminated materials shall comply with all applicable local, state, and federal regulations. It is MECX’s responsibility to properly manage all materials brought on Site for the ISCO application.
- Contaminated materials shall be stored in tightly closed containers in well-ventilated areas. Containers shall be moved only with the proper equipment and shall be secured to prevent dropping or loss of control during transport.

- Emergency equipment shall be located in readily accessible locations.
- All trenching, shoring, and excavation work must comply with all federal OSHA rules.
- No food or beverages shall be present or consumed in the regulated area. No tobacco products shall be present or used and cosmetics shall not be applied in the regulated area.
- Employees shall be required to wash their hands and face before eating, drinking, smoking, or applying cosmetics.
- All personnel shall avoid contact with potentially contaminated substances. Walking through puddles or mud, kneeling on the ground, or leaning against drums shall be avoided.
- Monitoring equipment shall not be placed on potentially contaminated surfaces.
- Field personnel must observe each other for signs of toxic exposure. Indications of adverse effects include, but are not limited to:
    - changes in complexion and skin discoloration;
    - changes in coordination;
    - changed in demeanor;
    - excessive salivation and pupillary response; and
    - changes in speech pattern.
- Field personnel shall be cautioned to inform each other of non-visual effects of toxic exposure such as:
    - headaches or dizziness;
    - nausea;
    - blurred vision;
    - cramps; and
    - irritation of eyes, skin, or respiratory tract.
- Prompt remedial action shall be taken whenever an inadvertent release of a hazardous material occurs.
- Appropriate action to provide secure footing shall be taken at all locations where personnel will be working.
- Provision must be made for cleaning gross contamination from boots and suits in the decontamination zone.
- Whenever solvents, cleaners, or other chemical substances are used for decontamination, a properly completed Material Safety Data Sheet (MSDS) for the chemicals shall be available at the work Site.
- Whenever flammable or combustible solvents are used for decontamination, specific procedures for the control of flammable gases and vapors may be necessary. When

concentrations of flammable vapors cannot be controlled by ventilation, this would include, but is not limited to, the following:

  - Tests shall be made by a qualified person to ensure that concentrations of flammable vapors in the work area do not exceed 20% of the lower explosive limit.
  - As appropriate, equipment on Site shall be bonded and grounded, spark proof, and explosion resistant.
  - An adequate supply of fire extinguishers with a minimum rating of 10 B&C, shall be strategically located throughout the work area so as to limit the travel distance required by any worker to reach the extinguisher to less than 75 linear feet.

- Each worker, as well as the SSO will take positive steps to ensure that employees are protected from physical hazards which would include, but are not limited to, the following:
  - Discharge of steam, high pressure air, water or oil;
  - Tools or other objects dropping from overhead;
  - Tripping over hoses, pipes, tools or equipment;
  - Slipping on wet, oily surfaces;
  - Insufficient or faulty personal protective equipment;
  - Insufficient or faulty operations equipment and tools; and
  - Noise in excess of acceptable levels.

5.3 Site Control

5.3.1 Site Delineation

Prior to the start of work, the SSO will establish specific work zones to reduce the transport and exposure of contaminants or chemicals at the Site. The following three work zones will be established.

- Exclusion Zone

The Exclusion Zone is an area centered immediately (at least a 20-foot radius) around the point of activity. All personnel in the exclusion zone must be wearing the level of PPE specified by the SSO. Entry and exit to the exclusion zone will be regulated and will be permitted only in a pre-specified area.

- Contamination Reduction Zone

The Contamination Reduction Zone is established adjacent to the Exclusion Zone entrance/exit. The purpose of this zone is to serve as a transition area between clean and contaminated areas at the Site. All decontamination equipment and materials will be located in this zone. PPE will be removed and decontaminated in this area prior to leaving.

- Support Zone

The Support Zone is established in a clean or non-contaminated area away from (and upwind when possible) from the Exclusion Zone. This area will contain support facilities and areas for potable water, first aid, and eating and changing. Normal work clothes are permitted in this area. Only clean PPE is allowed in the Support Zone.

5.3.2 Other Site Control Measures

Access

Access to the Site shall be restricted to authorized personnel. All personnel shall enter and exit the regulated area through the decontamination zone.

Buddy System/Site Communications

If the size or topography of the Site is such that operations will be conducted out of continuous visual contact with support zone personnel, a buddy system, or means of immediate voice communication (two-way radio) shall be instituted.

Posting

The Site should be posted to warn the public of potential hazards. Also, notices regarding the use of protective equipment (hardhats, safety glasses, etc.) should be placed at the access points to the sites. Additional notices of specific hazardous areas should be posted where needed.

Visitors

All visitors to the Site shall notify the field operations leader or SSO of their presence upon arrival. Visitors shall be escorted at all times.

6.0 PERSONAL PROTECTIVE EQUIPMENT

6.1 Levels of Protection

Level A
Level A protection will not be utilized on this project.

Level B
Level B protection will not be utilized on this project.

Level C
Level C protection should be used when:

1. The atmospheric contaminants, liquid splashes, or other direct contact will not adversely affect or be absorbed through any exposed skin;
2. The types of air contaminants have been identified, concentrations measured, and an air-purifying respirator is available that can remove the contaminants; and
3. All criteria for the use of air-purifying respirators are met.

Level D

Level D protection should be used when:

1. The atmosphere contains no known hazard; and
2. Work functions preclude splashes, immersion or the potential for unexpected inhalation of or contact with hazardous levels of any chemicals.

The standard level of protection for work on this project is Level D, consisting of: Safety shoes; Safety glasses; Ear plugs; Long pants and long-sleeve shirt*; and Canvas or leather work gloves.

*T-shirts may be substituted during general oversight activities when ambient air temperatures exceed 80°F

6.2 Respiratory Protection (General)

- Only properly cleaned and maintained NIOSH/MSHA approved respirators shall be used on site.
- Selection of respirators, as well as any decisions regarding upgrading or downgrading of respiratory protection will be made by the regional health and safety officer.
- Air purifying cartridges shall be replaced at the beginning of each shift or when load-up or breakthrough occurs.
- No employee shall be assigned to tasks requiring the use of respirators if, based upon the most recent examination, a physician determined that the employee will be unable to function normally wearing a respirator or that the safety or health of the employee or

other employees will be impaired by use of a respirator. This shall be so stated on the medical certificate.

- Only employees who have had pre-issue qualitative fit tests and annual fit tests thereafter shall be allowed to work in atmospheres where respirators are required.
- If an employee has demonstrated difficulty in breathing during the fitting test or during use, he or she shall have a supplemental physical examination to determine the cause of the difficulty.
- Where practical, respirators will be assigned to individuals for their exclusive use.
- Respiratory devices will be cleaned, sanitized, and inspected at the completion of each shift activities.
- Contact lenses are not to be worn while using any type of respiratory protection.
- Excessive facial hair (beards) prohibits proper face fit and effectiveness of respirators. Persons required to wear respirators must not have excessive growth of beard. All personnel wearing respirators will be required to be clean-shaven prior to each day's shift.
- Regular eyeglasses cannot be worn with full-face respirators (breaks the face piece seal). Inserts must be used.
- The respiratory protection utilized on site will be in compliance with 29 CFR 1910.134.
- Where respirators are designated for protection against particulate contaminants, the employee shall be permitted to change canisters or cartridges whenever an increase in breathing resistance (load-up) is detected.

6.3 Task Protection Matrix

ACTIVITY	LEVEL OF PROTECTION
General site excavation/utility work	D

6.4 Action Levels

The breathing zone action levels established for this project are listed below:

INSTRUMENT	READING	ACTION TAKEN
Photoionization Detector (PID)	Background to Background + 5 ppm	Continue Work.
	Background + 5 ppm to Background + 100 ppm	Upgrade to Level C. Air-purifying respirator with organic vapor canisters

These action levels will be used in conjunction with air monitoring at the Site. The breathing zone is defined as the area from the workers' waist up, forward of the shoulders. Instrument readings should be stable and continuous for at least 15 minutes.

During the ISCO application, PID measurements will be taken periodically from the following locations on Site:

- The breathing zone directly above each ISCO well head assembly on Site.
- The top of each reflux overflow bucket (one per well head).
- Predetermined points around or within the perimeter of the exclusion zone.

Air monitoring activities will be documented in the field log book and/or recorded on an air monitoring log sheet (see Appendix B).

6.5 Decontamination

6.5.1 Personnel Decontamination

Personnel decontamination facilities will be established on site to ensure that personnel maintain a high degree of personal hygiene and minimize the possibility of exposure to chemical hazards.

A personnel decontamination area will be established to facilitate controlled removal of contamination and protective clothing. All personnel exiting the exclusion zone will pass through the decontamination area to remove gross contamination. This will be accomplished via two-stage washing of outer gloves and boots, the first stage using soap and water, and the second stage being a clean water rinse. An emergency eyewash station will be located in the immediate area for employees who may come in contact with contaminated materials.

Personnel are required to wash hands, face, and other exposed skin areas prior to leaving for breaks or lunch. Boots, gloves and respirators will be decontaminated following standard procedures prior to entering the support zone.

6.5.2 Instrument Decontamination

Instruments used in potentially contaminated areas should be protected from contamination by plastic wrap to the extent feasible (take care not to cover air inlets or exhaust ports). Decontamination of instruments is to be conducted using appropriate solvents (alcohol, distilled water, etc.) so that the instruments are visually clean.

6.5.3 Equipment Decontamination

Equipment used in potentially contaminated areas (bucket augers, trowels, etc.) will be decontaminated prior to entering the Site. Upon completion of the project, or prior to leaving the Site, the equipment will be cleaned with a sequential wash/rinse procedure to remove potentially contaminated media.

6.5.4 Decontamination Waste Disposal

Wastes generated during personnel and instrument decontamination (i.e., water, solvents, rags, paper towels, etc.) shall be collected and, if required, neutralized to a pH between 6 and 9 using a color-changing acid neutralizer, and disposed of properly once the neutralizer indicates complete neutralization.

7.0 EMERGENCY PROCEDURES

7.1 Emergency Notifications

In the event of an emergency requiring notification of off-site personnel, the field operations leader is responsible for immediately contacting the appropriate agencies. If the field operations leader is unavailable, the Site safety officer will perform this function. A list of phone numbers for emergency agencies and utilities will be posted at the Site (See Table 1). A hospital route map (See Figure 2) will also be posted or available.

Each day or as often as necessary, the field operation leader shall designate an assembly point in case of emergency. Whenever an employee reports, or becomes aware of an emergency condition, the employee shall immediately proceed to the assembly point. The field operation leader shall account for all personnel on site, and shall provide instructions on further actions to be taken, including declaration of "all clear".

7.2 Decontamination

If a worker becomes injured in the exclusion zone, he/she must be decontaminated to the extent practical without impairing the individual’s health. If the injury is considered minor, the person should be decontaminated fully before being moved to the support zone.

7.3 Transport

If an injured worker requires treatment at a hospital or clinic, the following information should accompany them:

- MSDS or other information regarding the chemical(s) the person has been in contact with; and
- Personal Medical Information.

7.4 General First Aid

7.4.1 Physical Injury

For minor injuries, routine first aid procedures shall be applied. If required, the injured employee shall then be transported to the hospital. First aid providers shall take precautions to avoid contact with blood or other potentially infectious materials. Any instances requiring rendering of first aid shall be reported to the SSO during the shift on which the incident occurred.

For major injuries, an ambulance shall immediately be called, the emergency medical responders shall assess the nature and extent of the injury. In cases of severe injury occurring along with chemical contamination of the victim, and if injuries permit, the victim shall be decontaminated or have the contaminated garments removed prior to being transported in the ambulance, but only if these actions will not pose risk to the victim's health. Ambulance and hospital personnel shall be advised if decontamination was not performed.

In the event of bleeding, broken bones, shock, burns, heat exhaustion, heat stroke, seizure, insect stings, etc., the trained personnel shall use Red Cross approved measures for treatment.

7.4.2 Chemical Injury

- Appropriate safety gear shall be worn when treating the victim.
- The victim shall be removed to fresh air
- The victim's vital signs shall be assessed, and resuscitation shall be initiated if necessary.
- Call the nearest Poison Control Center for technical advice and assistance.

7.5 Injury Specific First Aid

If a worker experiences one of the following injuries or conditions, first aid procedures will be administered as follows:

Skin Exposure

If skin irritation develops from dermal contact with a contaminant or chemical, the affected area should be washed with a mild soap or detergent and rinsed with water for at least 15 minutes. If the condition persists, seek medical attention.

Eye Exposure

If a chemical/foreign object enters a worker’s eye, the material should be flushed out using an eye wash kit that will be stationed nearby. Seek medical attention immediately.

Inhalation

If an employee becomes ill or is overcome by chemical fumes, he/she should be moved to an area of fresh air. Seek medical attention if condition does not improve.

Ingestion

If a chemical or material is ingested, do not induce vomiting. Seek medical attention immediately and refer to the chemical’s MSDS for specific information.

Heat Exhaustion

If a worker is suffering from heat exhaustion, move him/her to a cooler area. The worker should lie down with the feet slightly elevated and clothing should be loosened or removed. Cold packs or towels can be used to cool the worker’s skin. If the person can tolerate water, one-half glass of water should be given every 15 minutes. Seek medical attention if the worker’s condition does not improve.

Heat Stroke

If a worker suffers a heat stroke, move him/her to a cooler area and seek medical attention immediately. The person should be cooled as quickly as possible by immersing him/her in a cool bath or wrapping the body in a wet cloth. Monitor the worker for symptoms of shock and do not give the person anything by mouth.

Frostbite

If a worker suspects he/she may be suffering from frostbite, the worker should be moved to a warm area. Place the affected area in warm (not hot) water. Handle the affected area gently-do not rub or massage them. The injured area should be bandaged loosely to prevent further irritation. Seek medical attention if necessary.

Hypothermia

If a worker is suffering from hypothermia, move the person to a warm area and seek medical attention immediately. Do not give the person anything by mouth.

7.6 Fires

7.6.1 Small Fires

A small fire is defined as a fire that can be extinguished with a single 10-pound dry chemical fire extinguisher. In the event of a small fire, Site personnel will take the following actions:

- Evacuate all unnecessary personnel from the area, if possible to an upwind location.
- Request emergency response assistance (ambulance, fire, hospital, poison control center) as needed for any injuries or exposure to hazardous chemicals.

7.6.2 Large Fires

In the event of a large fire or a small fire which cannot be extinguished, the following actions will be taken:

- Evacuate all unnecessary personnel from the Site, preferably to an upwind location.
- Notify the fire department and other emergency response services (police, ambulance, hospital, poison control center) as needed.

7.7 Spills

NEVER RISK A LIFE TO SAVE EQUIPMENT.

If a spill of hazardous material occurs, the following actions will be taken:

- Notify the field operations leader immediately.
- Take immediate measures to control and contain the spill within Site boundaries.

- Keep unnecessary personnel away, isolate the hazardous area and deny entry.
- Stay upwind and keep out of low-lying areas.
- Allow no flares, smoking, or flames in hazard area.
- For liquids, keep combustibles away from the spilled materials.
- For small dry spills, shovel contaminated materials into dry containers and cover. Use care not to make material airborne. Label the containers as to contents and remove to a secure area.

For small liquid spills, absorb the liquid with sand, clean fill, or other noncombustible absorbent material. Place contaminated material in a container, cover and label it, and remove it to a secure area.

7.8 Logs, Reports, and Record-keeping

8.8.1 Accident Reporting

Following any accident, near miss, or declared emergency, the field manager shall prepare a report describing the incident using the Supervisor's Injury/Incident Report form (See Appendix C).

This report will be submitted to the Group health and safety director within one working day of the event.

7.8.2 Air Monitoring Records

Real time monitoring (FID/PID, O2/LEL) records shall be maintained on the Air Monitoring Log Sheet or in the field log book. Instrument field calibration and maintenance records shall be maintained in the same log.

7.9 Emergency Equipment On-Site

The following emergency equipment will be kept and maintained on the Site at all times:

• First Aid Kits, Potable water supply, Fire Extinguishers, Eye Wash Kit, Chemical Shower, mobile Phone, two-way radios, and Spill Kit.

FIGURES

FIGURE 1

HOSPITAL ROUTE MAP

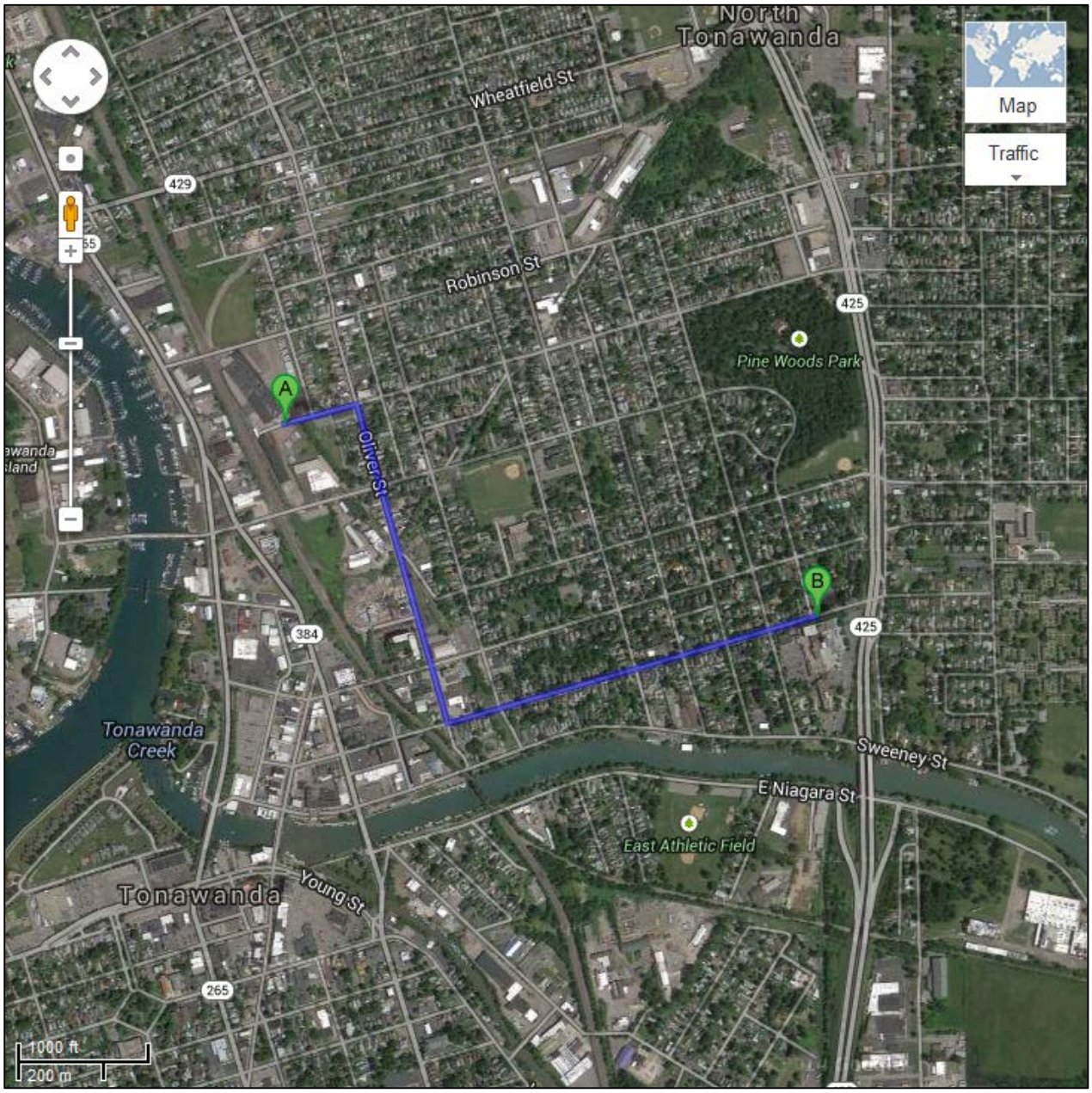


TABLE 1

EMERGENCY PHONE CONTACT LIST AND MEDICAL INFORMATION

EMERGENCY PHONE NUMBERS

FIRE DEPARTMENT	911
POLICE DEPARTMENT	911
HOSPITAL (EMERGENCY)	911

HOSPITAL/EMERGENCY MEDICAL INFORMATION

NAME DeGraff Memorial Hospital

PHONE (716) 694-4500
ADDRESS 45 Tremont Street, North Tonawanda, NY, 14120

DIRECTIONS Travel 1.1 mi (about 4 mins)

1. Head east on Schenck St toward N Marion St 0.1 mi
2. Take the 1st right onto Oliver St 0.5 mi
3. Turn left onto Tremont St 0.6 mi
4. Hospital will be on the right

KEY FACILITY EMERGENCY CONTACTS PHONE LIST

Name	Position	Office Phone	Cell Phone

APPENDIX F

Sample Inspection Forms

SCHRECK'S SCRAPYARD SITE
NYSDEC SITE NO. 932099
SITE-WIDE INSPECTION FORM
(PAGE 1 of 1)

GENERAL INFORMATION

Date:		**Inspector:**	
Weather:		**Signature:**	
Temperature:		**Company:**	
Season (circle one): Winter Spring Summer Fall			

SITE INSPECTION LOG SHEET

Evidence of Disturbance(s) (Y/N):		**Description of Disturbance(s):***	
Evidence of Demolition (Y/N):		**Description of Demolition:***	
Evidence of Building Construction (Y/N):		**Description of Building Construction:***	
Evidence of site use change (Y/N):		**Description of New/Additional Site Use:***	
Comments:			

* Attach map showing locations and any other information as required.

APPENDIX G

Record of Decision

New York State Department of Environmental Conservation

MEMORANDUM

TO: DISTRIBUTION
FROM: Robert W. Schick, Chief, Remedial Section A, BWRA, DHWR
SUBJECT: Schreck's Scrapyard Site, Record of Decision, North Tonawanda (T), Niagara County, Site No. 9-32-099
DATE: OCT 09 1990

Attached is the executed Record of Decision (ROD) for the above referenced site. Remedial Alternatives have been evaluated for three distinct remedial units at the site and the ROD selects the following remedial actions:

Site Soils: Soils contaminated with PCBs, heavy metal, asbestos as well as volatile and semi-volatile compounds associated with gasoline and oil spills are to be excavated, treated to comply with land ban restrictions and disposed off-site at a permitted hazardous waste disposal facility.

Building and Road Decontamination: Decontamination of two on-site buildings and the public roadways adjacent to the site which are contaminated with PCBs.

Buried Drums: Negotiations are ongoing for a removal action by Occidental Chemical Corporation (OCC) of approximately 60 drums and soils contained in the pit.

Appendix A of the ROD contains the responsiveness summary. This section answers questions and comments raised by the public concerning the selected remedies for this site. If there are any questions, please contact me or Steven Scharf, of my staff, at 518/457-4343.

Distribution

A. Fossa, DOA
J. Kelleher, DOW
J. Cooper, DFW
J. Spagnoli, Reg.9
J. Sciascia, Reg.9
P. Nelson, Reg.9
J. Ryan, Buffalo Field Unit, DEE
G. Bailey, Buffalo Field Unit, DEE
R. Tramontano, NYSDOH
A. Wakeman, NYSDOH
E. Belmore, BWRA
J. Harrington, BPM

Attachment

New York State Department of Environmental Conservation
Division of Hazardous Waste Remediation

RECORD OF DECISION

for

SCHRECK'S SCRAPYARD SITE

City of North Tonawanda, Niagara County, New York
Site No. 9-32-099

Declaration Statement - Record of Decision

Site Name and Location:

Schreck's Scrapyard Site
City of North Tonawanda, Niagara County, New York
Site Registry No. 9-32-099
Classification Code: 2

Statement of Purpose:

The Record of Decision (ROD) sets forth the selected remedial action plan for the Schreck's Scrapyard site. This remedial action plan was developed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and the New York State Department of Environmental Conservation (NYSDEC) Law (ECL). The selected remedial plan complies to the maximum extent practicable with Applicable or Relevant and Appropriate Requirements (ARARs) of Federal and State environmental statutes and will be protective of human health and the environment.

Statement of Basis:

This ROD is based upon the administrative record for the Schreck's Scrapyard site and upon public input to the Proposed Remedial Action Plan (PRAP). A copy of the administrative record is available at the NYSDEC, 50 Wolf Road, Albany, New York 12233-7010 and copies of the Remedial Investigation/Feasibility Study (RI/FS) report and the PRAP are available for public review at the City of North Tonawanda Library at 505 Meadow Drive, North Tonawanda, New York. A responsiveness summary that documents the public's expressed concerns and related correspondence from State and local government agencies has been included as Appendix A. Appendix B contains relevant figures and tables regarding the site. A bibliography of those documents included as part of the administrative record is contained in Appendix C.

Description of Selected Remedy:

The selected remedial alternative has been developed for protection of public health and welfare, protection of the environment, technical feasibility and performance and compliance with statutory requirements. The selected remedial alternative encompasses three distinct remedial units found at the site.

The NYSDEC evaluated the alternatives (see Table 1 Appendix B, initial screening of alternatives) for each of the three (3) remedial units identified in the next section, against the following criteria:

- Compliance with the applicable or relevant and appropriate regulations (ARARs)

- Reduction of toxicity, mobility or volume
- Short term effectiveness
- Long term effectiveness and permanence
- Implementability
- Community Acceptance
- Total cost of remediation, and; overall protection of human health and the environment

After review and evaluation, the NYSDEC's technical personnel have selected the most feasible alternatives for each of the three remedial units.

A. Remedial Unit 1 - Site Soils: Excavation, Treatment and Off-Site Disposal.

Excavation, treatment and off-site disposal is the selected remedial action. This alternative relies on well established technologies for the removal and disposal of contaminated soils. Removal of the contaminated soil from the site will effectively eliminate the potential threats from dermal exposure, ingestion or inhalation and eliminates the possibility of any future contaminant migration from the Schreck's Scrapyard site. This plan will meet the remedial action goals set forth in the Remedial Investigation and Feasibility Study (RI/FS). Areas adjacent and near the site that require action will also be excavated. Confirmatory sampling will be used to verify the clean-up. The exact method of soil treatment and the treatment, storage and disposal facility to be utilized will be further delineated during the design phase, with final selection the result of the construction bid. Once excavation is complete the site will be backfilled to grade with clean soil.

An excavation clean up level of 10 parts per million for the main contaminant of concern, Polychlorinated BiPhenyls (PCBs), has been established for this site. PCBs are a listed hazardous waste (B007) under the Resource Conservation and Recovery Act (RCRA) (40CFR 261.32). Additional requirements of particular importance are the land disposal restrictions for these wastes which will become effective prior to initiating this remedial action. These regulations, codified in 40CFR part 268, set treatment standards with which the wastes must comply in order to be eligible for disposal. The treatment standards set by these regulations will determine the degree and type of treatment required prior to land disposal. The standards which will govern the determination of appropriate treatment will be identified during the design with the final treatment method being governed by the capabilities and permit conditions of the selected disposal facility. Contaminated soils to be addressed range from 1 to 9 feet in depth; with most of the contamination in the upper three feet. These soils will be disposed of in a permitted hazardous waste landfill. It is estimated that approximately 7,500 cubic yards of soil will be excavated from the site. The estimated cost for design and construction for remedial units 1 and 2 is $4,500,000.

B. Remedial Unit 2-Building and Roadway Decontamination

Two buildings, a garage and an office, are located on the site and both are contaminated by PCBs. In addition, the activities at the site have spread contaminated soils to the roadways in the immediate vicinity of the site. As part of this remediation contaminated interior and exterior building surfaces as well as the road pavement will be cleaned. The surface residues will be collected and disposed off-site along with the excavated soils. This decontamination will be either by use of high pressure steam cleaning or a solvent wash process. The exact decontamination procedure will be selected during the design phase.

The road in front of the salvage yard has been impacted by off-site migration of contaminated soils. First, contaminated road and building sediment will be removed. Then the selected decontamination procedure will be used to clean the affected non-porous surfaces. The limits of the building and road decontamination will be set during the design phase of the project immediately before construction commences. Confirmatory sampling will verify the effectiveness of the remedial action.

C. Remedial Unit 3 - Buried Drums

Drums of waste from the Occidental Chemical Corporation's (OCC) Durez plant were found to have been buried in an abandoned press pit in the rear of the scrapyard. Currently, the NYSDEC is negotiating an order on consent with OCC to remove these drums and any soils contaminated by the drummed waste from the press pit area.

Declaration

The selected remedial action will meet State and Federal ARARs by removing the contaminated soils from the site. In removing the contaminated soils the groundwater unit will also be addressed by removing the source of the contamination. It is expected the groundwater will be restored through national attenuation and degradation of the contaminants.

The remedy will satisfy, to the maximum extent practical the statutory preference for remedies that employ a treatment that reduces toxicity, mobility or volume as a principle element.

The selected remedial actions will result in a minor increase in short term risks. Workers involved in its implementation will have the potential for increased risks due to the exposure to contaminants which may escape during the implementation of the selected remedial action. Appropriate monitoring and precautions will be implemented to minimize this risk.

The selected remedial action for the contaminated soil and drum removal have been successfully implemented at other hazardous waste sites. Excavation and disposal are relatively straight forward procedures and pose no significant problems. In addition the decontamination procedures to be used on the buildings and roads are also proven technologies.

Each of the selected remedies will result in the complete and permanent removal of contaminants from the site. Therefore, site delisting is expected. Prior to delisting confirmatory sampling and short term monitoring will verify the effectiveness of the remediation. If this site is delisted, no long term monitoring or maintenance program will be required. No additional actions will be required to provide adequate protection of human health and the environment.

Date: 9/28/90

Edward O. Sullivan
Deputy Commissioner
Office of Environmental Remediation
New York State Department of
Environmental Conservation

RECORD OF DECISION

I. SITE LOCATION AND DESCRIPTION

The Schreck's Scrapyard site, located at 55 Schenck Street in North Tonawanda, New York is presently operated as an automotive scrapyard by VJT Salvage Inc.. The site is located in a mixed light industrial and residential area. The scrapyard is bordered on the north by Schenck Street, with the Lawless Container Corporation located across the street. Lawless also borders the west side of the site and Tondisco Incorporated, a beverage distributor borders the south side of the site. The eastern border of the site consists of Conrail tracks. Across from these tracks is an empty lot which at one time was the location of a metal and wood fabrication shop. This shop was destroyed by fire in 1974. Although no residential property is adjacent to the site, a residential neighborhood lies approximately one block to the east (see Figures 1 & 2).

The approximately 1.5 acre scrapyard is in a deteriorated condition. The fencing around the site is broken in various locations. The site contains four significant structures; a cinder block office building, a garage, the frame of an abandoned bailer machine with a concrete foundation and the abandoned press pit. The site has a soil base containing scrap material which is oily and essentially void of vegetative growth. The scrapyard contains various piles of scrap (tires, cars, refrigerators) and is typically filled with junk cars and automotive parts.

II. SITE HISTORY

Schreck's Iron and Metal Company operated a scrap iron business at this site from 1951 to 1953, site operations prior to 1951 are unknown. In 1953, the business was sold to Bengart and Memel, Inc., who reportedly operated a scrap metal business until 1977. In addition to the metal salvage operation between 1953 and 1975, drums of phenolic waste from Occidental-Durez were also brought to the site and were hauled by Bengart and Memel's trucks to local waste disposal facilities. In one instance it was reported, 50 to 60 drums of phenolic wastes were landfilled in an abandoned press pit located at the south end of the property. The drums were placed into the approximately 18-20 feet deep concrete pit on top of building debris which partially filled the pit. The pit was then covered with approximately 2 feet of soil. The presence of these drums was confirmed during the remedial investigation.

From 1960 to 1975, it was reported that transformers from Niagara Mohawk Power Corporation (NIMO), and New York State Electrical and Gas (NYSEG) were routinely brought to the site for salvage. The metal containers were sheared and the oil was then allowed to spill onto the ground. Reportedly, the oil soaked soils were periodically excavated by a dozer and pushed towards the eastern property boundary.

Between 1975 and 1983 the former Schreck's Scrapyard changed ownership several times. In 1983, Lawless Container Corporation retained RECRA Research Inc. (RECRA) to conduct a prepurchase environmental audit of the property. Analysis of two composite soil samples revealed the presence of polychorinated biphenyls (PCBs) at 18 and 66 parts per million (ppm), elevated levels of heavy metals, and the presence of phenols, cyanide and volatile organic compounds. Based on the results of this audit Lawless did not purchase the former Schreck's Scrapyard property.

The New York State Department of Environmental Conservation (NYSDEC) Phase I site classification was conducted by RECRA in 1986. The analyses from the Lawless Environmental Audit were used in this report. The PCBs present in the soil in excess of 50 ppm led to the sites listing as a Class 2 inactive hazardous waste site. This 50 ppm action level was set by federal regulations under the Toxic Substances Control Act (TSCA), 40 CFR 761 and by State regulation 6 NYCRR 371.4(e) which identifies PCB contaminated soil (B007) as a listed hazardous waste.

III. CURRENT STATUS

A. Previous Investigations

1. Property Environmental Audit June, 1983 - RECRA Research Inc. See Site History for details.

2. Phase I - June, 1986 - RECRA Research Inc. See Site History for details.

B. Environmental Setting

The area surrounding the site is primarily residential to the northeast, southeast and east and industrial/commercial to the north, west and south (see Figure 2). Lawless Container Corporation borders the site to the west and across Schenck Street to the north. Tondisco, Inc. borders the site on the south side and a vacant lot lies east of the site across a Conrail Railroad spur. Population within a one mile radius of the site is greater than 20,000. All residents of North Tonawanda are connected to a public water supply. There is no known groundwater usage within a three mile radius of the site, however, water intakes serving the City of Tonawanda, the City of North Tonawanda and the City of Lockport are located about one mile west of the site in the Niagara River (see Figure 1).

The branch of the Niagara River known as the Little River is located approximately 700 feet west of the site. The Niagara River is a Class A Special (international boundary waters) water resource suitable for potable water, culinary or food processing purposes. The confluence of Tonawanda and Ellicott Creeks is located approximately 2500 feet south of the site. Tonawanda Creek in this location is a Class C waterway suitable for fishing and secondary contact recreation. Ellicott Creek is a Class D waterway suitable for secondary contact recreation.

New York State regulated wetlands TE-12 and TE-15 are located over one mile west and north of the site respectively. Wetland TE-12 lies less than a mile west of the site across the Niagara River on Grand Island. There are no known critical habitats of endangered species within one mile of the site. The site is not situated in a 100-year floodplain.

C. Topography and Drainage

Topography in the area including the site is generally flat with a grade of less than one percent. Elevation of the site is approximately 575 feet above sea level. The Niagara River (Little River section) is located 700 feet to the west and the confluence of Tonawanda and Ellicott Creeks is approximately 2500 feet to the south.

The site is located in a very urbanized setting and run-off from the area is directed towards municipal storm sewers. Most precipitation on the site probably infiltrates the ground surface.

D. Geology

The bedrock formation first encountered underlying the site, is the Camillus Shale of Silurian age. This unit is described as a gray, red and green thin-bedded shale. Limestone and dolomite interbed with the shale and beds and lenses of gypsum up to five feet thick are found in the unit. The Camillus Shale is estimated to be about 400 feet thick and dips southward at approximately 40 feet per mile.

Unconsolidated materials are found above the bedrock, which in this area are of glacial origin and consist primarily of lacustrine clays with stringers of sand and silt. The U.S. Geological Survey drilled a test boring approximately three miles northeast of the site in 1982. Unconsolidated deposits consisted mostly of pink to gray-green clay with some sandy pink clay. Bedrock at the U.S. Geological survey boring was encountered at 27 feet below ground surface. The remedial investigation also drilled a test boring to bedrock. The bedrock at the site was encountered at a depth of 40.5 feet below ground surface.

E. Soils

Soils in the area including the site have been classified by the Soil Conservation Service as the Canandaigua-Aynham-Rhinebeck association. These are somewhat poorly drained and moderately well drained soils having a dominantly medium-textured to fine-textured subsoil. These soils formed in glacial lacustrine deposits of silt, very fine sand and clay. The seasonal high water table rises to within one foot of the ground surface in spring and in other excessively wet periods.

As the site has been a scrapyard for almost 40 years, original soils have been greatly disturbed or removed. Site soils have been characterized as black, cindery fill with assorted glass, slag, metal pieces and automotive debris and having an oily odor.

F. Groundwater

The hydrogeologic system in areas near the site consist of a bedrock aquifer in the Camillus Shale overlain by an aquifer in the unconsolidated deposits. Where gypsum has been dissolved in the Camillus Shale, openings exist for the passage and storage of water. Water within the bedrock flows through solution zones, joints, and fractures. The Camillus Shale is estimated to have a transmissivity ranging from 7000 to 70,000 gallons per day per foot. Groundwater in the shallow bedrock discharges to Tonawanda Creek, Ellicott Creek and the Niagara River.

The low permeability of the glacial lacustrine deposits results in a seasonal high water table following wet periods. This perched water table discharges into areas of low topography and eventually into nearby surface water bodies.

G. Analytical Results

In 1983, RECRA was contracted by Lawless Container Corporation to collect and analyze surface (0-1 feet) and near-surface (1-3 feet) soil samples from two locations at the site. The samples were scanned for halogenated organics, volatile halogenated organics, and volatile organics and analyzed for PCBs, phenol, oil and grease, total cyanide, lead, zinc, nickel, arsenic, selenium, copper, chromium, cadmium and mercury. Analytical results can be found in the Remedial Investigation report. Concentrations of lead, zinc, nickel, copper, chromium, cadmium and mercury in both samples exceeded background levels in undisturbed soil samples from the Buffalo and Tonawanda areas. Arsenic concentrations in the two samples were 17 and 90 ppm and cyanide concentrations were 5.7 and 10 ppm. The organic scans indicated detectable levels of volatile organics, halogenated organics and volatile halogenated organics. Total recoverable phenolic levels were 4.9 and 36 ppm, and total PCBs ranged between 18 and 66 ppm. According to Federal Regulation 40 CFR 761.60 (TSCA) and New York State Regulation 6NYCRR 371.4, soils containing greater than 50 ppm PCBs are considered a hazardous waste and must be disposed of as required under law.

As a result of the Phase I findings, Schreck's Scrapyard became a Class 2 inactive hazardous waste site. A Class 2 site is defined under New York State Code Rules and Regulations (NYCRR) Title 6 Part 371 as a significant threat to public health or the environment, where action is required. The existing data allowed this classification to be made and eliminated the need for the NYSDEC to conduct a Phase II investigation of the site.

... ENFORCEMENT STATUS AND THE STATE SUPERFUND INVESTIGATION:

The NYSDEC was unable to enter into a consent agreement with the potential responsible parties (PRPs) identified for the site to perform a Remedial Investigation/Feasibility Study (RI/FS). Therefore, the site was referred to the NYSDEC Division of Hazardous Waste Remediation in 1987 to be addressed using funding from the 1986 Environmental Quality Bond Act (EQBA).

Eder Associates P.C. Consulting Engineers Inc. (Eder) of Locust Valley, New York was contracted by the NYSDEC to perform a RI/FS at the Schreck's Scrapyard site under the New York State Superfund program. The objectives of the RI/FS were to:

- Assess the nature, areal extent and effects of the hazardous materials in the project area;

- Identify and evaluate remedial alternatives selected to mitigate contamination problems that pose threats to the environment or to public health, as determined by the field work and risk assessment conducted during the RI;

- Recommend remedial alternatives.

Guidelines for the investigation were established based upon the March 1988 EPA document, "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA".

Currently, the NYSDEC is negotiating a consent order with the Occidental Chemical Corporation (OCC). Under this order, OCC will perform a removal action to excavate and remove the buried drums, construction debris, contaminated soils and water found in the press pit as well as evaluate the structural integrity of the press pit. If necessary an additional workplan may be needed to address areas which may have been impacted if the pit leaked. In addition, several other PRPs are being contacted concerning their involvement with the PCB contamination and the implementation of the remedy presented in this document.

V. GOALS OF THE REMEDIAL ACTION:

General objectives of the remedial activities at the site will entail controlling, minimizing, or eliminating the migration of contaminants from the soil. Human health risks for contaminants found in site soils and groundwater were addressed directly by setting remedial objectives based on the applicable promulgated federal and New York State criteria. These criteria comprise the applicable or relevant and appropriate requirements (ARARs).

The human health risks were calculated as part of the remedial action and these values are found in the baseline risk assessment. The baseline risk assessment addresses the potential impacts to human health and the environment from the past waste disposal practices associated with the site. This assessment was conducted in accordance with the USEPA Superfund Public Health Evaluation and Exposure Assessment Manual. The calculations and details of the baseline risk assessment are available in the RI/FS report on file at the document repository established at the City of North Tonawanda Public Library, 505 Meadow Drive, North Tonawanda, New York. In addition, all other documents and materials associated with this site are available at the North Tonawanda Library for public review.

A $1x10^{-6}$ carcinogenic life-time risk was selected as a benchmark for evaluating exposure. This level was selected based on review of regulatory precedent and the review of risks of every day living. Nine potential carcinogenic chemicals were selected as potential carcinogenic indicator chemicals for evaluation. Ten non-carcinogenic indicator chemicals were selected for risk assessment evaluation also. A hazard index is used to evaluate the non-carcinogenic risk. A 1.0 benchmark is used for evaluating this non-carcinogenic exposure.

Risks and remedial objectives for site soils are based on estimated absorbed doses for nearby residential and onsite exposure. The results of risk characterization at the Schreck's Scrapyard site indicate that contaminated on- site soils pose unacceptable long term public health threats to onsite workers, pose an unacceptable risk if the property were used for residential purposes and a potential risk for residents in the immediate vicinity of the Schreck's Scrapyard site in the present unremediated conditions at the site. Further remedial action is necessary to reduce this risk to acceptable levels.

The selected remedial action will meet State and Federal ARARs by removing the contaminated soils from the site. The groundwater standards for several volatile organic compounds have been exceeded by compounds related to site auto salvage activities but not hazardous waste disposal. This is based on analytical results of one off-site and one on-site well. The off-site well indicated a limited extent of groundwater contamination. These off-site well analytical results were from the first sampling round with the second round resulting in non-detect values for all compounds when sampled one year later. The on-site well installed during the second round of sampling indicated levels of volatile organics compounds above groundwater standards. These compounds are components of gasoline and other fuels which have been spilled during the salvage operation and have contaminated the surface soils.

Specific groundwater remedial measures are not being considered since all the volatile organic compounds discovered will biodegrade over time and the major source of the volatile organic compounds, the site soils, will be removed as part of the remedial action for the site. In addition, implementation of groundwater remedial alternatives cannot be justified based upon the capabilities of available technologies, the limited extent of groundwater contamination detected, and the associated costs of implementation.

Further reasons for not remediating the on-site groundwater contamination are 1) this site is located in an industrially zoned area, 2) public water is supplied and no groundwater is used as the public water supply source, 3) based on the estimated rates of groundwater migration, this contamination does not pose a threat to any surface water bodies. Therefore, since the proposed removal of soil from the site contaminated with PCBs will also remove the major spill soaked soils which are the source of this contamination, no groundwater remediation is proposed.

VI. SUMMARY OF THE EVALUATION OF THE ALTERNATIVES

A comprehensive list of remedial technologies was utilized to determine potentially feasible technologies. Each potentially feasible technology was then subjected to a technical screening process where each alternative was evaluated based on its overall ability to remediate the site. The initial screening of alternatives can be found in the RI/FS report. Table 1 (see Appendix B) highlights all of the alternatives that were included in the detailed analysis.

There are three separate remedial units identified for this site. The first remedial unit deals with the organic and inorganic contaminants found in on-site soils. The second unit will decontaminate the on-site buildings and the road in front of the site. The third remedial unit will be a removal action that will deal with the drums buried in the old press pit. The remedial alternatives which passed the initial screening for each unit are listed below:

A. Remedial Unit 1 - Site Soils

The following seven remedial alternatives for dealing with contaminated soils passed the initial screening:

1. No Action: The evaluation of this alternative is always required. In this case, no action is unacceptable due to the health risks presented by contamination found on site.

2. Multi-Layer Cap: This containment system is effective in minimizing contact with contaminated soil. The multi-layer cap also reduces infiltration due to rain water. However, this alternative will contain, but not remove any contamination found on site. Also, this technology will increase the volume of site material and limit if not totally restrict future use of the site.

3. Multi-Layer Cap with Solidification: This remedial alternative uses solidification technology to bind up the contaminants in the soil. The multi-layer cap is used to prevent the elements from attacking the solidified structure. This process will eliminate the risk posed by exposure to contaminated soils. This remedial alternative has the disadvantage of increasing the volume and limiting the future use of the site.

4. On-site RCRA Subtitle C Landfill: This remedial alternative involves excavating and temporarily stockpiling all contaminated soils to allow for construction of an on site RCRA Subtitle C landfill. This landfill will effectively eliminate human contact with the contaminated soil. The RCRA landfill cell will be capped with a multi-layer design consistent with required technology. This landfill will also have a leachate collection/leak detection system to prevent any groundwater contamination.

   The disadvantage to this remedial alternative is that the volume of material on-site is increased. Also, future use of the site will be limited. Finally, all the wastes are contained, rather than destroyed or removed.

5. On-site RCRA Landfill with Stabilization: This alternative contains the same key features as alternative 4, however, this alternative will also solidify the materials prior to placement into the RCRA landfill. The stabilization will eliminate the need for a leachate collection system. This alternative will also eliminate contact with the contaminated soil.

   The disadvantages remain similar to alternative 4, however, these will be a significant increase in volume resulting from the solidification of the waste.

6. In Situ Vitrification: In Situ Vitrification (ISV) will destroy or immobilize all contaminants in the site soils that contain contaminants above target clean-up levels. ISV is a thermal treatment process that converts contaminated soil into a chemically inert crystalline glass product. ISV provides complete destruction and removal of hazardous organic contaminants by pyrolysis. The organic contaminants in the soil are pyrolized and migrate to the surface of the melted zone where they combust in the presence of oxygen. Hazardous inorganics are effectively immobilized in the residual glass product. The residual glass product provides a reduction in soil volume in excess of 30 percent.

   The ISV process effectively destroys or removes hazardous organics and immobilizes inorganic compounds in the soil. This alternative has demonstrated a high level of long-term effectiveness.

   There are some major disadvantages to this technology. The first and foremost is that it is the most costly remedial alternative to implement. The second is that partial excavation is required to create soil piles deep enough for ISV to operate. The final product is an inert glass monolith structure, similar to leaded crystal. Finally, a full scale remedial action has yet to be conducted utilizing this technology.

7. Excavation, Treatment and Off Site Disposal:

Under this alternative the contaminated soils from the site will be excavated. The excavated soils will be treated for off-site disposal in accordance with requirements of 40CFR Part 264. Planned construction safeguards will protect public health from the potential hazards associated with fugitive dust and other construction activities. The excavated soils will be sent to RCRA Subtitle C landfill for treatment as appropriate and disposal. Off-site disposal of contaminated soils with the range of contaminants found at the site is an established remedial method. This technology will provide a high level of long-term effectiveness.

The main contaminant of concern, Polychlorinated BiPhenyls (PCBs) has an on site excavation clean up level of 10 parts per million. This is a listed hazardous waste (B007) under RCRA (40CFR 261.32). Requirements of particular importance are the land disposal restrictions for these wastes which will become effective prior to initiating this remedial action. These regulations, codified in 40CFR part 268 set treatment standards with which the wastes must comply in order to be eligible for disposal. Contaminated soils to be addressed range from 1 to 9 feet in depth; with most of the contamination in the upper three feet. These soils will be disposed of in a permitted hazardous waste landfill. It is estimated that approximately 7,500 cubic yards of soil will be excavated from the site. The estimated cost for remedial design and construction is $4,500,000.

B. Remedial Unit 2 - Building and Roadway Decontamination

1. No Action:

As previously discussed, this alternative must be evaluated. No action is inappropriate in this case since the floors of the two buildings have PCB concentrations above acceptable limits.

2. High Pressure Storm Wash/Solvent Wash:

i. High Pressure Steam Wash : This is a common remedial action used to clean non-porous surfaces. Specific types of detergents may be added to clean the PCB contaminated surfaces. The washwater is collected, sampled and disposed. This remedial alternative is readily available and will achieve the desired clean up levels.

ii. Solvent Wash - Specific solvents can be used to wash affected surfaces and remove the PCB contamination. The solvents used in this process are collected, sampled and disposed. This alternative is also readily available and will achieve the desired clean up levels.

Conclusion: The decision as to which wash process to use will be made during the design phase. Since both methods are equally effective, cost and the type of solvents used will be weighted into the final decision for the building decontamination. However, preference will be given to the steam wash as this will prevent introduction of another solvent to the site.

The road in front of the salvage yard has been impacted by off-site migration of contaminated soils. First, contaminated sediment will be removed. Then, either the high pressure steam or solvent wash will be used to clean the non-porous road surfaces. The cost of this alternate is included in that of alternative 1.

C. Remedial Unit 3 - Buried Drums

This removal action consists of excavation, removal and off-site disposal of the buried drums, contaminated soils and the water from the press pit. The press pit structure will be decontaminated and evaluated for structural integrity. A determination will be made as to whether additional work will be required.

VII. SELECTION OF RECOMMENDED ALTERNATIVE

A. Remedial Unit 1: Site Soils

The seven remedial action alternatives for the site soils were developed, evaluated and compared for the Schreck's Scrapyard site. The information presented in the Feasibility Study was used to develop a recommendation of the proposed remedial alternative for this operable unit.

Eder Associates, the NYSDEC consultant, performed an engineering evaluation and narrowed down the selection to three remedial alternatives. These are:

Number 2:	Multi-layer Site Cap
Number 6:	In-Situ Vitrification
Number 7:	Excavation, Treatment and Off-Site Disposal

After intensive evaluation the NYSDEC is proposing alternative No. 7; excavation, treatment and off-site disposal. This alternative meets the remedial action objectives of prevention of direct contact with soils containing greater than 10 ppm PCBs. In addition to the PCBs, inorganics (heavy metals), volatile organics and asbestos also present will be permanently removed from the site. This remedial alternative meets all Federal and State Applicable, Relevant and Appropriate Regulations (ARARs).

Excavation, treatment and off-site disposal will require a higher capital expenditure than site capping. However, this is a permanent solution, with regard to the site itself, at much lower cost than in-situ vitrification. Excavation and off-site disposal offers protection that surpasses site capping. Finally, remedial alternative No. 7 has a more established and fixed cost that is much lower and not as open ended as In-Situ Vitrification (ISV). The total cost for design and construction of remedial units 1 and 2 is estimated to be 4.5 million dollars. Once remedial construction is complete, the NYSDEC will review the sites eligibility for delisting as a class 2 inactive hazardous waste site.

B: Remedial Unit 2: On-site Building and Roadway Surfaces:

The on-site buildings and roadway surfaces adjacent to the site are contaminated with PCBs. The contaminated roadway surfaces will be cleaned. This decontamination will be either a high pressure steam or solvent wash; with the exact decontamination procedure to be selected during the design phase. The contaminated street and building sediment will first be removed. Then the selected decontamination procedure will be used to clean the building and non-porous roadway surfaces.

C. Drum Removal

As previously stated, this is a removal action that will be performed by the Occidental Chemical Corporation.

VIII. Summary of the Governments Decision

NYSDEC evaluated all the alternatives, (Table 2, Appendix B) for each of the three (3) remedial units against the following criteria: 1) compliance with applicable or relevant and appropriate regulations (ARARs) 2) reduction of toxicity, mobility or volume 3) short term impacts 4) long term effectiveness and permanence 5) implementability 6) cost 7) community acceptance and 8) overall protection of human health and the environment. After review and evaluation, the NYSDEC's technical personnel have selected the following alternatives for each of the three remedial units.

- Contaminated soils: Excavation treatment and off-site disposal of soils contaminated with PCBs, asbestos and elevated levels of inorganics (heavy metals).

- Building and Road Decontamination: Sediment removal and either a high pressure steam or solvent wash.

- Drum Removal: Excavation, treatment and off-site disposal of drums and any soils contaminated by the buried waste. Also, any contaminated water from the buried pit will also be treated and disposed.

Based on the information available at this time, the preferred alternative will be protective of human health and the environment, will be in compliance with Applicable or Relevant and Appropriate Requirements of other State and Federal environmental statutes (ARARs), and will be cost effective.

On August 22, 1990 a public participation meeting was held in North Tonawanda, New York at which general support for the selected alternative was expressed. A Responsiveness Summary was prepared by the NYSDEC summarizing the public comments and the responses related to the RI/FS work at the Schreck's Scrapyard site. A copy of the summary is attached as Appendix A.

Appendix A

Schreck's Scrapyard Site

Site No. 9-32-099

Record of Decision

Responsiveness Summary

New York State Department of Environmental Conservation

Division of Hazardous Waste Remediation

RESPONSIVENESS SUMMARY

for the

SCHRECK'S SCRAPYARD SITE

Site No. 9-32-099

City of North Tonawanda
Niagara County, New York

INTRODUCTION

This report summarizes the public comments expressed at the public meeting held August 22, 1990 at the City Hall of North Tonawanda and the responses relative to the Remedial Investigation/Feasibility Study (RI/FS) report for the Schreck's Scrapyard site.

The New York State Department of Environmental Conservation (NYSDEC) listed the Schreck's Scrapyard site as a class 2 inactive hazardous waste site in 1986. The listed potential responsible parties (PRPs) refused to participate in a remedial program, therefore, the NYSDEC initiated the RI/FS in 1988 with funds from the 1986 Environmental Quality Bond Act (EQBA).

Eder Associates, under contract with the NYSDEC, performed an RI/FS at the Schreck's Scrapyard site. The objectives of the RI/FS were to:

- Assess the nature, areal extent, and effects of the hazardous materials in the project area;

- Identify and evaluate remedial alternatives selected to mitigate contamination problems that pose threats to the environment or to public health, as determined by the field work and risk assessment conducted during the RI;

- Recommend remedial alternatives.

A comprehensive list of remedial technologies was utilized to determine potentially feasible technologies within each of three remedial units, 1) the site soils; 2) building and roadway decontamination; and 3) buried drums.

The selected alternative for each remedial unit is listed below:

1) Site Soils - Excavation, treatment and off-site disposal of contaminated soils.

2) Building and Road Decontamination - Decontamination of building and roadway surfaces affected by hazardous wastes.

3) Buried Drums - Excavation, treatment and off-site disposal of buried drums and affected soils in the press pit.

At the August 22, 1990 public meeting the selected remedial alternatives were formally presented to the public and written comments or questions were accepted through September 7, 1990.

The following are the responses to the questions received.

1) Question: What testings were done off-site, especially in the residential area?

Answer: Polychlorinated biphenyls (PCBs) were found on the site in surface soils up to a maximum concentration of 140 parts per million (ppm) total PCBs. Off-site surface soil samples were collected and analyzed to determine the extent of PCB contamination that may be present due to past operational activities of the scrapyard (e.g. spillage, surface water runoff, tracking off-site by vehicular traffic, fugitive dust emissions, and volatilizaton). During the first round of sampling, surface soil samples collected from along the adjacent railroad tracks and along Schenck Street were analyzed for PCBs. Sediment samples analyzed for PCBs were also collected from two storm sewer catch basins in front of the site as well as from the adjacent road surface itself. The results showed only the tracks immediately adjacent to the site contained elevated levels of PCBs (up to 20 ppm total PCBs), in the soil. The second round of sampling confirmed this finding. In addition, in June 1990, additional surface soil samples were collected and analyzed for PCBs in the residential areas along Schenck and Marion Street, and along an alleyway which is parallel to Oliver Street. A storm sewer sediment sample was also collected along Marion Street. Laboratory results for total PCBs ranged from below the detection limit of 0.05 ppm to 0.88 ppm. These levels do not pose a significant health risk.

2) Question: Is there going to be an ongoing process of soil testing?

Answer: There will likely be further testing to delineate more exact limits of excavation during the design phase of this project. Air monitoring during remedial activities will be performed to monitor the effects of construction activities. Based on the air monitoring results, on-site activities may be modified to further protect the public and on-site workers (see response to question #8).

3) Question: I read that these chemicals vaporize and become airborne. Have they?

Answer: There were several chemicals found on-site that will vaporize. These are termed volatile compounds and in this case represent components typically associated with gasoline. Air monitoring performed during the RI has not found this vaporization to occur at detectable levels. However, during remedial activities soil will be excavated and removed which increases the potential for chemicals to volatilize and for contaminated dust particles to be generated. The remedial programs Health and Safety plan will address this (see response to question #8).

4) Question: Has any of contamination migrated into the sewer on Schenck Street?

Answer: The catch basins on Schenck and Marion Street adjacent to the site were sampled. While PCBs were identified, contamination was not found to be above levels of concern.

5) Question: Is the Schenck Street sewer a main sewer line?

Answer: Yes, the sewer on Schenck Street is the combined sanitary and storm sewer for Schenck Street and the south end of Marion Street. This sewer drains to an interceptor along River Road, away from the residential area, and flows to the City of North Tonawanda sewage treatment plant. During rainfall events there is the potential for some portion of this flow to be bypassed to the Niagara River.

6) Question: A few days ago (August 18, 1990) there was a strong petroleum smell at 2:00 a.m.

Answer: This is not believed associated with PCB contamination from the site.

7) Question: Where will you take this waste material, and is it here in New York State?

Answer: The excavated soil and other materials will be taken to a permitted hazardous waste disposal facility. At this point we do not know which one it will go to as this is a decision which will be made by the contractor who will do the work. It is possible that it will go to a facility in New York State.

8) Question: If the final alternative to remove all the soil is implemented, would there be any health risks to the immediate residents when it is being removed?

Answer: There will be an extensive Health and Safety Plan which will cover all aspects of this operation. An Air Monitoring program will be developed to measure the volatile and semi-volatile (e.g. PCBs) chemicals, and dust that maybe generated. Air monitoring will be conducted during all remedial construction activities involving the excavation or transport of site soils. When the monitoring results indicate that excessive contaminant levels are present, on-site activities will be modified to protect both the surrounding community and on-site workers. The Plan will specify action levels for work shutdown to minimize any emissions that may occur. The Health and Safety Plan will also include provisions for the use of dust suppression techniques (e.g. water misting) during remedial construction activities. An emergency plan must also be developed to protect the adjacent neighborhood and on-site workers in the unlikely event of an uncontrolled vapor emission. The Health and Safety Plan including the Air Monitoring program will be available for public review and comment as it is developed during design.

9) Question: The near surface soils were found to contain elevated levels of asbestos. How elevated is elevated?

Answer: The values for asbestos ranged from non-detect to 11 percent in the five samples collected and analyzed. These results characterize the soils as an asbestos containing material. An obvious source is automobile brake linings, however, there are other salvage operations that could have introduced asbestos to the site. Air monitoring during remediation will be performed to protect the public and on-site workers. Dust suppression techniques will be utilized to reduce the chances of asbestos becoming airborne.

10) Question: On Page 2 of the PRAP it states transformers from Niagara Mohawk, New York State Electric and Gas and Westinghouse were brought to the site and oil was allowed to spill on the ground. Were those companies contacted as far as the clean-up?

Question: I would like my State (NYS) to pursue the people responsible for this damage and make them take financial responsibility for this happening to this site. DEC owes it to the tax payers of New York State.

Answer: At specific points in the project, the NYSDEC routinely contacts the Potentially Responsible Parties (PRPs) to perform the necessary work at the site. The first contact occurred when the site was listed as a class 2 inactive hazardous waste site. The PRPs were given an opportunity to conduct the RI/FS; which they refused. Therefore, with funding from the 1986 Environmental Quality Bond Act (EQBA) the NYSDEC hired an engineering consultant to complete the RI/FS. Now that the RI/FS is complete and the remedial alternatives selected, the PRPs will again be contacted to complete this project. To date Occidental Chemical Corporation (OCC) has agreed to remove the buried drums found on the site. This agreement, in the form of a consent order will also encompass appropriate cost recovery. In addition all other PRPs will be pursued to recover costs associated with their involvement with this site.

11) Concern: My main concerns are my health, my parents health, who also live on Miller Street, and my neighbors. I'm also concerned about he damage to our waterway, Niagara River, soil, and the air that we're going to be breathing during the remediation and the air we have been breathing during the past 40 years.

Response: Potential impact to health is dependent upon the exposure that may occur. Exposure of the public to chemicals from this site is generally limited to the off-site surface soils. This exposure does not pose a significant health risk (see response to question #1).

Groundwater wells were installed down all sides of the site during the remedial investigation. No contamination was shown to be migrating off-site in the groundwater which may ultimately discharge to the Niagara River. Organic vapor analysis of the air on-site did not show any volatilization of contaminants from the site soils during the remedial investigation.

It is difficult, if not impossible, to assess exposure to air emissions for the past 40 years. However, since the surface soil sample results show only low levels of PCBs in the off-site areas, it is unlikely that significant exposures from past air emissions have occurred. An extensive Health and Safety Plan including an air monitoring program will be required during the remedial program (see response to question #8).

12) Concern: I'd also ask DEC and our city officials to rescind permits licensed to continue using that land right now, because that is jeopardizing people working, their health. I can't emphasize that enough. If DEC really cares about people's health, you're not going to allow that to continue, nor would OSHA allow it in any working environment.

Answer: The potential worker exposure to site contaminants is presently being evaluated by the NYSDOH. The Occupational Safety and Health Administration (OSHA), an agency of the federal government, does not regulate facilities with so few employees (approx. 5). The evaluation should be completed by NYSDOH within several weeks and provided to the NYSDEC as well as to the public.

13) Question: How will our sanitary and storm sewers be protected during remedial construction?

Answer: The design documents will address any potential site run-off during the removal project and require appropriate controls be instituted by the contractor performing the work.

14) Question: Has this site affected any of the homes on Marion or Schenck Street?

Answer: Based upon the results of the testing performed in the area, the NYSDOH has concluded that, "PCB levels found in surface soils and storm sewers collected from the residential neighborhood adjoining the Schreck's Scrapyard do not pose a significant health risk". (See response to question #1).

15) Question: Did the DEC check for anything beyond the railroad tracks or did you stop there?

Answer: DEC installed two monitoring wells approximately 50 feet east of the Conrail tracks and soil samples were also collected along Schenck Street and in the vacant lot east of the tracks. The groundwater and soil samples were analyzed for PCBs and the Toxic Compound List (TCL).

16) Question: When will the clean up begin?

Answer: The NYSDEC's best estimate is probably the spring of 1992.

17) Question: Were there soil testings done on the immediate residences on North Marion and Schenck Street.

Answer: The NYSDOH/NYSDEC collected surface soil and sewer sediment samples in the residential area. The NYSDOH determined that PCB levels found in surface soils and sewer sediment samples taken from the residential area adjoining Schreck's Scrapyard do not pose a significant health risk. (See response to question #1).

18) Question: How far from the site were samples taken?

Answer: The approximate limits of sampling were one block from the site. These samples did not identify any areas of concern.

19) Question: Currently, the NYSDEC has this site listed as a class 2 inactive hazardous waste site. Will this designation be changed after remediation?

Answer: Once the remedial construction is complete the NYSDEC Bureau of Hazardous Site Control, which is responsible for site classification, will reevaluate this site for delisting from the registry of inactive hazardous waste sites or appropriate reclassification.

20) Question: Can residential homes be built on this property once remediation is complete?

Answer: The NYSDEC will be evaluating the need to implement deed restrictions as the project progresses. Currently the area is zoned for industrial use, therefore, it is unlikely that residential development would be allowed or encouraged.

21) Question: I'd like to request health surveys, cancer, dioxins, etc.

Answer: The need for health studies or surveys are determined based on may factors including; where the chemicals are found (e.g., at or beneath the ground surface, in the air, in water at the surface or underground), the concentration(s) at which they are found, the ways in which people can be exposed to the chemicals (e.g., dermal contact, ingestion and inhalation) and the frequency of past and present exposure. The remedial investigation identified relatively high levels of PCBs (up to 140 ppm) on the site in the surface soils and low levels of PCBs (less than 1 ppm) off-site in the surface soils along Schenck and Marion Streets and the alleyway parallel to Oliver Street (see response to question #1 for additional details). When evaluating possible exposure to contaminants in soil, the most

significant exposure scenarios for the off-site soils are dermal contact and ingestion (particularly by small children). However the levels in those surface soils are so low that even when the above exposure scenarios are considered, they do not pose a significant health risk. It is unlikely that a health survey or studies could differentiate between low level exposure that may occur from this site and other exposures from the environment, workplace, and food.

22) Question: Can you guarantee to those people living in that area, that the land will be habitable?

Answer: The environmental data (groundwater, soils, and sewer sediment results) gathered to date has shown that migration off-site is limited to nearby surface soils and sewer sediments. The level of PCBs in these off-site soils/sediments and the associated exposure scenarios (dermal contact and ingestion) do not result in a significant exposure or impact to the adjacent residential area. Thus, the surrounding area and residents are not significantly affected by the site.

23) Question: Since it has been proven that there is an unacceptable risk to property and residents in that immediate area, has a health survey been proposed? If not, why not?

Answer: The "unacceptable risk" which is mentioned in the PRAP only refers to the on-site contamination. There would be an "unacceptable risk" if the site under current conditions was used for residential purposes. The question of the need for health studies is addressed in the response to question #21.

24) Question: Who may we contact in the Health Department? Who is the contact person for us to inquire about samplings and maybe updates between these meetings?

Answer: The public can contact Al Wakeman or his staff at 518/458-6309, or Charlene Theimann of the DOH, Health Liaison Program at 1-800-458-1158 ext. 402. For further info write: NYS Department of Health, Bureau of Environmental Exposure Investigation, Niagara County Section, 2 University Place, Room 205, Albany, New York 12203.

25) Question: How can we find out about what the potential health effects are posed to citizens because of the technical data analysis from the different chemicals? I'm not a chemist. I don't know what the effect of lead is and how much I have to be concerned about or PCBs, thing like that.

Answer: PCBs or polychlorinated biphenyls are a group of more than 200 manufactured chemical compounds. Many trade names have been used for PCB mixtures, the most common name being Aroclors. Aroclors are identified by a four digit number. The last two digits of the number reflect the weight of chlorine in the mixture. For example, Aroclor 1248 contains 48% chlorine. In addition to PCBs, commercial Aroclors also contained small quantities of other chemical impurities from manufacturing packaging processes.

Because PCBs are fire resistant and poor conductors of electricity, they were primarily used as insulating fluids in electrical capacitors and transformers. Large quantities were also used as hydraulic and heat transfer fluids in industries. For many years, PCBs were used as fillers in adhesives, plastics, paints, carbonless copy paper and other office and consumer products. However, in the 1960's, potential health and environmental problems were associated with PCBs and in 1977 the manufacturing of PCBs was banned in the United States.

Low levels of PCBs are found throughout the world; they have been identified in soil, water, air and in many life forms that make up the food chain. When PCBs are improperly disposed of on land, they have the potential to be washed away by rain and melting snow into nearby waterways and to a lesser extent seep through the soil into groundwater and possibly result in exposure of people and animals to PCBs.

People are exposed to PCBs primarily through ingestion of contaminated food and to a lesser degree from breathing vapors containing PCBs or by absorption of PCBs through the skin. Studies have shown that excessive exposure to PCBs can cause toxic effects in humans and animals. Most of our knowledge of the human health effects associated with PCB exposure comes from three sources: the continuing investigation of accidental poisoning, such as the one that occurred in Japan in 1968, studies of occupational exposure, and studies of women in the general population with elevated levels of PCBs in their blood.

In the Japanese accident, people unknowingly ate rice oil contaminated with PCBs at levels as high as 3,000 parts per million (ppm) and other more toxic chemicals. Effects observed included eye and skin disorders, headache, fatigue, digestive disturbances and respiratory disorders. Scientists who studied reproductive outcomes in Japanese families who had eaten contaminated rice oil and found an elevated occurrence of babies born with discolored skin, runny eyes and low birth weight. However, since the mixture of PCBs in Japan was found to contain other, more toxic chemicals, including polychorinated dibenzofurans, the reproductive effects and other effects may have been caused by these chemicals and not be the PCBs.

Effects reported after short-term exposure to high concentrations of PCBs in workplace air also include skin and eye irritation, headache, digestive disturbances and liver disfunction. Two studies conducted by the NYS Department of health of female workers exposed to low levels of PCBs found some evidence of a link between direct exposure to PCBs and lower birth weight in their children.

One of two recent studies of women in the general population who ate large amounts of fish found that women with relatively high PCB blood levels may have babies with slightly lower birth weights. Both studies suggested newborns of women with relatively high past exposure to PCBs responded differently on a series of behavioral tests than did newborns of mothers with relatively low past exposure to PCBs. However, in both studies the possibility that other chemical contaminants were present in the fish and their influence on the reported outcome has not been studied fully assessed.

The widespread presence of PCBs in the environment has led to low levels of PCBs in nearly everyone in the U.S. Studies have shown that PCB blood levels are related to a person's occupation, age, length of time working in a job involving exposure to PCBs, and level of alcohol consumption. In one such study, the Health Department reviewed medical data for workers (police, fire and public utility workers) who responded to a transformer explosion in the Chimes Building in Syracuse. The study found that while the highest PCB blood level among the workers was higher than among unexposed persons, it was similar to the 1987 average reported by the Centers for Disease Control of 5 to 7 parts per billion (a ppb is a thousand times lower than a part per million).

In laboratory animals, there is experimental evidence of a carcinogenic (cancer-causing) effect of some types of PCBs. PCBs have not been shown to cause cancer in humans. Other effects of PCBs on laboratory animals include low birth weight, skin disorder, liver disfuntion and suppression of the immune system. Information from animal studies and human studies indicate the potential for adverse human health effects. Therefore, long-term exposure to PCBs should be minimized.

There are chemical fact sheets included in the RI/FS report to help address the public's concern over the potential health effects associated with site contamination. This document is available for public review at the North Tonawanda Public Library. To obtain additional information, the public may contact Charlene Theimann of the DOH Health Liaison Program at 1-800-458-1158, ext. 402.

Appendix B

Schreck's Scrapyard Site

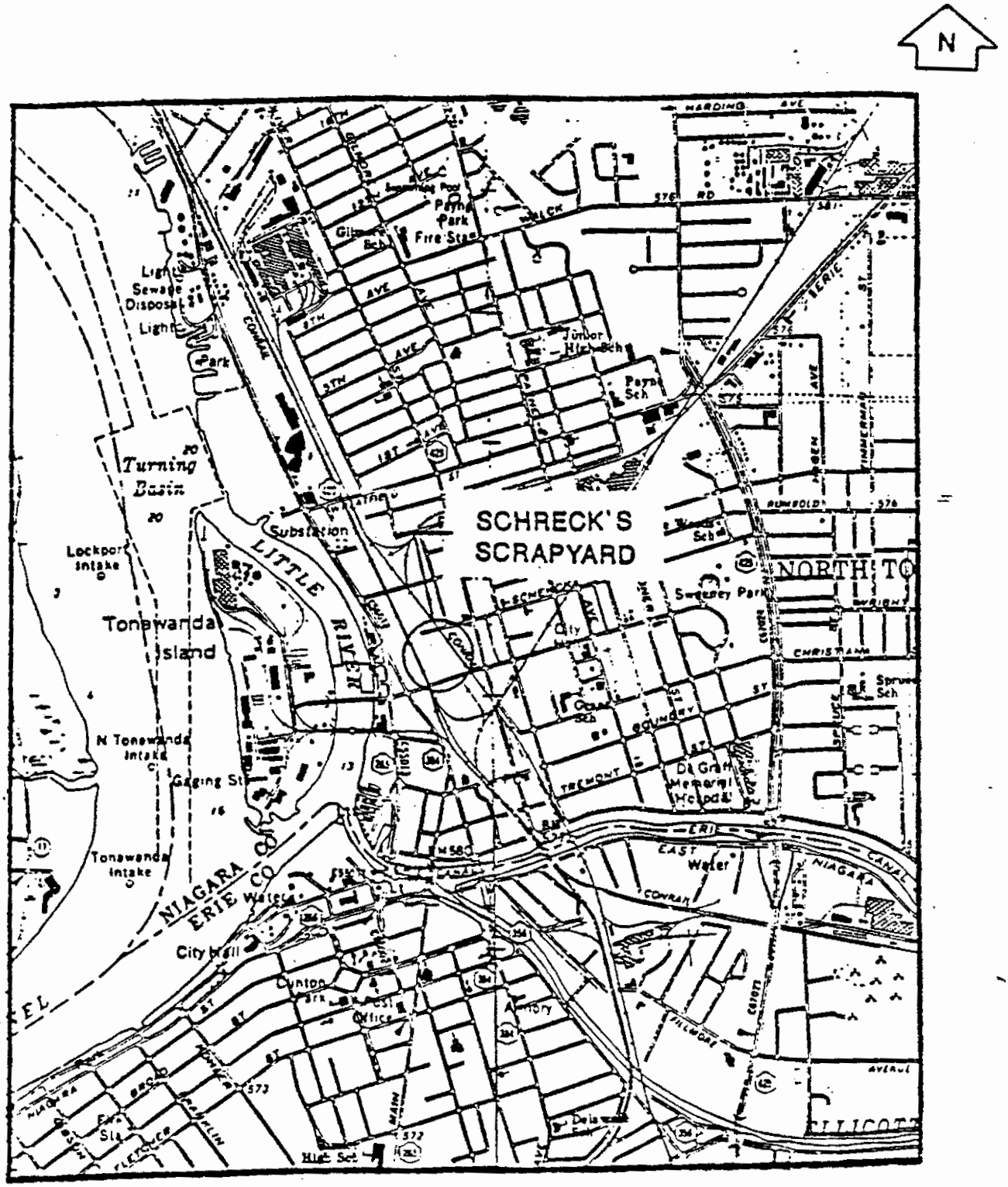
Site No. 9-32-099

Record of Decision

Figures and Tables

FIGURE 1

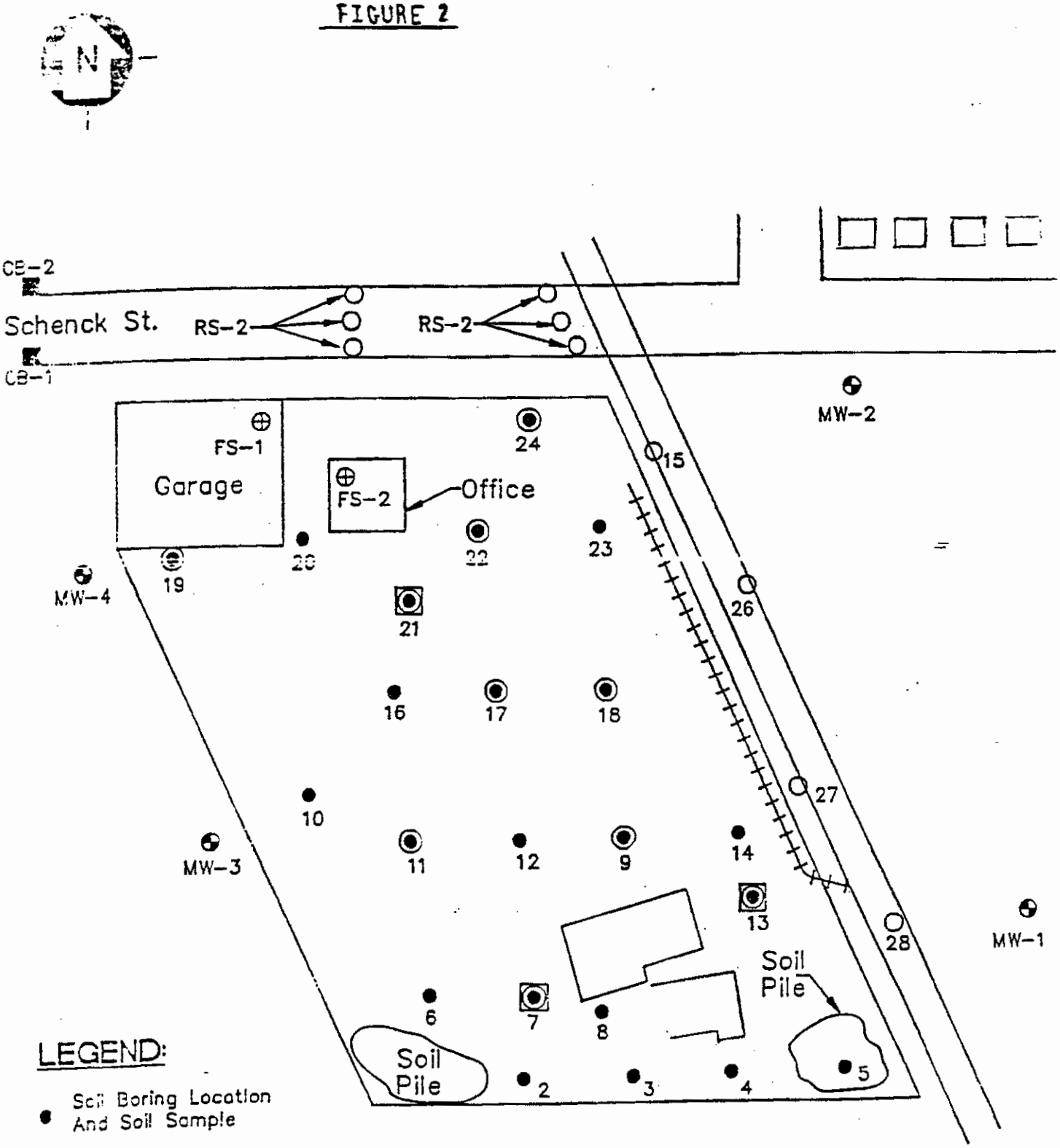
SCHRECK'S SCRAPYARD SITE
NORTH TONAWANDA, NEW YORK



SCALE : 1"=2000'

LOCATION MAP

FIGURE 2



LEGEND:

- ● Soil Boring Location And Soil Sample
- ○ Surface Sample
- □ Includes TCL Sample
- ◧ Catch Basin Sample
- ⊖ Floor Sample
- ◔ Monitoring Well

SAMPLE LOCATION MAP

SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK

SK611-1Y

TABLE 1
Remedial Alternatives

	Location	Action	Method
ALTERNATIVE 1	Site	No Action	None
	Drummed Waste	No Action	None
	Bldgs./Street	No Action	None
	Soils	No Action	None

	Location	Action	Method
ALTERNATIVE 2	Site	Access Restriction	Fence/Deed Restriction
	Drummed Waste	Excavation	Complete Excavation
		Stabilization	Macroencapsulation
		Offsite Disposal	RCRA Treatment Facility
	Bldgs./Street	Decontamination	High Pressure Wash/Solvent Wash
		Offsite Disposal	RCRA Treatment Facility
	Soils	Capping	Multi Layer

	Location	Action	Method
ALTERNATIVE 3	Site	Access Restriction	Fence/Deed Restriction
	Drummed Waste	Excavation	Complete Excavation
		Stabilization	Macroencapsulation
		Offsite Disposal	RCRA Treatment Facility
	Bldgs./Street	Decontamination	High Pressure Wash/Solvent Wash
		Offsite Disposal	RCRA Treatment Facility
	Soils	Capping	Multi Layer
		Solidification/ Stabilization	Cement Based/Pozzolan-Cement Based

TABLE 1 (Continued)
Remedial Alternatives

	Location	Action	Method
ALTERNATIVE 4	Site	Access Restriction	Fence/Deed Restriction
	Drummed Waste	Excavation	Complete Excavation
		Stabilization	Macroencapsulation
		Offsite Disposal	RCRA Treatment Facility
	Bldgs./Street	Decontamination	High Pressure Wash/Solvent Wash
		Offsite Disposal	RCRA Treatment Facility
	Soils	Onsite Disposal	RCRA Landfill

	Location	Action	Method
ALTERNATIVE 5	Site	Access Restriction	Fence/Deed Restriction
	Drummed Waste	Excavation	Complete Excavation
		Stabilization	Macroencapsulation
		Offsite Disposal	RCRA Treatment Facility
	Bldgs./Street	Decontamination	High Pressure Wash/Solvent Wash
		Offsite Disposal	RCRA Treatment Facility
	Soils	Onsite Disposal	RCRA Landfill
		Solidification/ Stabilization	Cement Based/Pozzolan-Cement Based

TABLE 1 (Continued)
Remedial Alternatives

	Location	Action	Method
ALTERNATIVE 6	Site	Access Restriction	Fence/Deed Restriction
	Drummed Waste	Excavation	Complete Excavation
		Stabilization	Macroencapsulation
		Offsite Disposal	RCRA Treatment Facility
	Bldg./Street	Decontamination	High Pressure Wash/Solvent Wash
		Offsite Disposal	RCRA Treatment Facility
	Soils	Thermal Treatment	Vitrification

	Location	Action	Method
ALTERNATIVE 7			
	Site	Access Restriction	Fence/Deed Restriction
	Drummed Waste	Excavation	Complete Excavation
		Stabilization	Macroencapsulation
		Offsite Disposal	RCRA Treatment Facility
	Bldgs./Street	Decontamination	High Pressure Wash/Solvent Wash
		Offsite Disposal	RCRA Treatment Facility
	Soils	Excavation	Complete/Partial Excavation
		Offsite Disposal	RCRA Treatment/RCRA Landfill

TABLE 2

DETAILED COMPARISON OF ALTERNATIVES

Protection of Human Health & Env.	Compliance with ARAR'S	Long Term Effectiveness	Reduction in Toxicity Mobility and Volume	Short Term Effectiveness	Implementability
S-1					
- Not Effective	- Non-compliance with PCB re-entry guidelines	- Not effective	- No reduction	- Not effective	- No obstacles to implementation
S-2					
- Provides effective protection to health & environment	- Non-compliance with RCRA/TSCA for bringing off-site soils to a non-permitted facility (i.e., on-site)	- Cap is expected to be effective at eliminating human contact hazard and immobilizing soil contaminants - Cap system will require long-term maintenance - All soil contaminants are left on-site untreated	- All drum wastes removed - All PCB contaminated surfaces are decontaminated - Soil contaminants immobilized, however no reduction in toxicity or volume	- Short project length (9 months) - On-site workers will use proper PPE to minimize dust/fume exposure -Community exposure will be minimized by engineering/construction controls and by on-site soils not being disturbed by excavation - Minor increased construction equipment traffic risk	- No obstacles to implementation
S-3					
- Provides highly effective protection to health and environment	- Non-compliance with RCRA/TSCA for bringing off-site soils to a non-permitted facility (i.e., on-site)	- Cap is expected to be effective at eliminating human contact hazard and immobilizing soil contaminants - Solidification will reduce mobility of soil contaminants and further reduce human contact risk - Cap system will require long-term maintenance	- All drum wastes removed - All PCB contaminated surfaces are decontaminated - Soil contaminants immobilized (inorganics at very high effectiveness level, organics at high effectiveness level) - No reduction in toxicity or volume of soil contaminants	- Short project length (12 months) - In-site workers will use proper PPE to minimize dust/fume exposure - Community exposures will be minimized by engineering/construction controls - In-situ solidification & capping will cause only minimal fugitive dust release since contaminated site soils are left in-place - Moderate increased construction equipment traffic risk	- Volume increase of contaminated soils from solidification process would need to be controlled

TABLE 2
DETAILED COMPARISON OF ALTERNATIVES

Protection of Human Health and Environment	Compliance with ARAR's	Long Term Effectiveness	Reduction in Toxicity Mobility and Volume	Short Term Effectiveness	Implementability
S-4					
- Provides highly effectve protection to health and environment	- Non-compliance with RCRA/TSCA for bringing off-site soil to a non-permitted facility (i.e., on-site)	- RCRA landfill will be effective at eliminating human contact hazard and immobilizing soil contaminants - Cap & leechate system will require long-term maintenance	- All drummed waste removed - All PCB contaminated surfaces are decontaminated - Highly effective method is employed to immobilize soil contaminants - No reduction in toxicity or volume of soil contaminants	- Moderate project length (18 months) - On-site workers will use proper PPE to minimize dust/fume exposure - Community exposures will be minimized by engineering /construction controls - Stringent precautions will be required during excavation to prevent the release of excessive levels of asbestos - Moderate increased construction equipment traffic risk	- Great care would be required during soil excavation to prevent excessive asbestos release

TABLE ..2
DETAILED COMPARISON OF ALTERNATIVES

Protection of Human Health and Environment	Compliance with ARAR's	Long Term Effectiveness	Reduction in Toxicity Mobility and Volume	Short Term Effectiveness	Implementability
S-5					
- Provides highly effective protection to health and environment	- Non-compliance with RCRA/TSCA for bringing off-site soil to a non-permitted facility (i.e., on-site)	- Landfill cap will be effective at eliminating human contact hazard - RCRA landfill will be highly effective at immobilizing soil contaminants - Solidification would further minimize human contact risk and reduce mobility of soil contaminants - Cap and leachate system bill require long-term maintenance	- All drummed wastes removed - All PCB contaminated surfaces are decontaminated - RCRA landfill provides highly effective method of immobilizing soil contaminants - Solidification results in significant further immobilization of inorganics and further immobilization of organics - No reduction in toxicity or volume of soil contaminants	- Long project length (24 months) - On-site workers will use proper PPE to minimize dust/fume exposure - Community exposures will be minimized by engineering/ construction controls - Fugitive dust control plan would require careful implementation to assure that asbestos and other dust levels are not excessive - Moderate increased construction equipment traffic risk	- Great care would be required during soil excavation to prevent excessive asbestos release - Volume increase of contaminated soils from solidification process would need to be controlled
S-6					
- Provides very high level of protection to health and environment	- Non-compliance with RCRA/TSCA for bringing off-site soils to a non-permitted facility (i.e., on-site)	- Very high level of long-term effectiveness	- All drummed wasted removed - All PCB contaminated surfaces are decontaminated - Complete destruction/removal of hazardous organics in soil - Metals/inorganics effectively immobilized in residual crystalline glass mass - Soil volume is reduced	- Long project length (24 months) - On-site workers will use proper PPE to minimize dust/fume exposure - Engineered controls eliminate fume release from ISV processing - Insignificant level of increased construction traffic risk	- Bench scale treatability testing would be required to assess ISV applicability to Schreck soils - On-site demonstration testing of ISV technology may be required

TABLE 2
DETAILED COMPARISON OF ALTERNATIVES

Protection of Human Health and Environment	Compliance with ARAR's	Long Term Effectiveness	Reduction in Toxicity Mobility and Volume	Short Term Effectiveness	Implementability
S-7					
- Provides highly effective protection to health and environment	- Complies with ARARs	-High level of long-term effectiveness as all wastes are moved off-site	- All Drummed wastes removed - All PCB contaminated surfaces are decontaminated All soil contaminants displaced to an approved RCRA landfill	- Short project length (12 months) - On-site workers will use proper PPE to minimize dust/fume exposure - Stringent precautions will be required during excavation to prevent the release of excessive levels of asbestos - Moderate increased construction equipment traffic risk	- Great care would be required during soil excavation to prevent excessive asbestos release

Appendix C

Schreck's Scrapyard Site

Site No. 9-32-099

Record of Decision

Administrative Record