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February 8, 2008

Mr. John J. Piston
Project Manager
NYSDEC Region 7
615 Erie Boulevard West
Syracuse, New York 13204-2400

Re: Groundwater Analytical Results, November 2007
Pass & Seymour (P&S) Boyd Ave Brownfield Cleanup Program
(BCP) Site No. C734102

Dear Mr. Piston:

Enclosed is a summary of groundwater analysis results for samples collected from one (1) overburden and four (4) bedrock and groundwater monitoring wells at the P&S site in November 2007. These groundwater monitoring wells were installed in October 2007 at in accordance with an NYSDEC-approved *Supplemental Remedial Investigation Work Plan* (S&W Redevelopment, August, 2007).

The locations of new (2007) monitoring wells are shown on Figure 1, along with RI monitoring wells previously installed in 2005. Table 1 presents the depths of the new wells, their top-of-PVC elevations, the depth to groundwater, and the depth to bedrock encountered at each of the well locations. Figure 2 is a bedrock groundwater contour map based on November 2007 depth to water measurements. The contour pattern indicates bedrock groundwater flows in the same prevailing direction as overburden, towards the north, and consistent with the topographic slope of the area.

Groundwater samples were collected in November 2007 from the four newly installed bedrock wells (BR07-29, -30, -31, and -32), the newly installed overburden well (OB07-30), and previously installed RI monitoring wells. Laboratory analytical results are included as Attachment 1 to this letter. Table 2 summarizes the analytical results for the November 2007 sampling event.

The November 2007 groundwater samples contained chlorinated volatile organic compounds (Cl-VOCs), in particular in bedrock monitoring well BR07-30, north of the former manufacturing building and west of the existing office building. Figure 3 shows the 2007 analytical results for TCE. Bedrock analytical data are presented in text boxes adjacent to the respective monitoring wells. Overburden results are illustrated as isoconcentration contours. TCE was detected at a concentration of 34,000 micrograms per liter (μg/L) in bedrock well BR07-30, north of the former manufacturing facility, which corresponds to the area where overburden groundwater contamination was detected at the highest levels. West and east of the area, bedrock groundwater samples from BR07-31 (west) and BR07-29 (east) contained 7.1 μg/L and 250 μg/L of TCE,

respectively. The upgradient bedrock monitoring well, BR07-32, contained 7.6 µg/L of TCE.

The Supplemental RI Work Plan had indicated that additional bedrock monitoring wells would be installed as contingency wells if field observations indicated additional wells were warranted to characterize groundwater in bedrock. However, there were no apparent signs of contamination based on field observations (visual, odors, PID), nor was there any indication of contamination as the wells were developed, purged, and sampled following their installation. Based on the analytical results, it appears that additional bedrock monitoring wells are needed to further delineate bedrock contamination.

The attached Figure 4 proposes locations for three (3) off-site downgradient bedrock monitoring wells. The objective will be to install the three downgradient bedrock wells to a comparable depth into bedrock (i.e. ~ 10 feet into rock) as the existing bedrock wells, to further define the limits of groundwater contamination. Following installation, the new bedrock wells will be sampled along with the four existing bedrock wells, and the groundwater samples will be analyzed for VOCs (method 8260). The analytical results will be provided to NYSDEC for review, along with a revised groundwater contour map that will include the surveyed locations and groundwater elevations for the new bedrock wells. Following NYSDEC review, we will meet with you to discuss the need for further evaluation prior to completing the final RI Report and Remedial Work Plan.

After you have reviewed the data contained herein, we will schedule a meeting with you before the end of this month to discuss implementation of the proposed work.

Very truly yours,
S&W REDEVELOPMENT OF NORTH AMERICA, LLC

Daniel P. Ours, CPG
Senior Project Manager

pc: Mr. Phil DeCicca, Pass & Seymour
Ms. Doreen Simmons, Hancock & Estabrook

Table 1. Pass & Seymour
Bedrock Monitoring Well Groundwater Elevations
November 26-27, 2007

Well I.D.	Top of PVC Elev.	Total Well Depth	Depth to Water	Groundwater Elev.
BR07-29	416.56	29.18	16.75	399.81
BR07-30	419.63	21.8	15.84	403.79
BR07-31	408.77	19.91	3.47	405.3
BR07-32	427.42	18.65	15.18	412.24
OB07-30	415.84	5.71	5.68	410.16

Measurements in feet.

Table 2. Groundwater Sample Analysis Results, VOCs. P&S Boyd Ave BCP Site No C734102 Remedial Investigation, Nov 2007.

Sample Number Collection Date Screened Interval Analyte	TOGS [2] GW Standards ug/l (ppb)	MW05-01 11/20/07 3' -10.5' bgs	MW05-03 11/26/07 3.5' - 13.5' bgs	MW05-04 11/20/07 3.5' - 11.5' bgs	MW05-05 11/20/07 8' - 18' bgs	MW05-06 11/20/07 5.5' - 13.5' bgs	MW05-07 11/20/07 3.5' - 13.5' bgs	MW05-08 11/26/07 8' - 13' bgs	MW05-10 11/26/07 10' - 20' bgs	MW05-11 11/20/07 4' - 14' bgs	MW05-12 11/20/07 6' - 16' bgs	MW05-14 11/20/07 3' - 11' bgs	MW05-15 11/20/07 3.8' - 13.8' bgs	MW05-16 11/20/07 4.5' - 14.5' bgs	MW05-17 11/27/07 3.5' - 13' bgs	MW05-19 11/20/07 7.5' - 17.5' bgs
VOCs (8260)		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloromethane		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Vinyl chloride	2	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromomethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1-Dichloroethene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Carbon disulfide	60 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Acetone	50 G	U	U	U	4.0 JMB	U	U	U	6.3 JMB	3.6 JMB	UM	U	U	U	U	UM
Methylene chloride	5	U	U	U	UM	U	U	1.2 JB	1.4 JB	0.86 JB	U	U	U	U	U	U
trans-1 2-Dichloroethene	5	U	U	U	UM	U	U	UM	U	U	U	U	U	U	U	U
1 1-Dichloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
cis-1 2-Dichloroethene	5	U	U	U	17 #	2.0 J	U	6.4 J #	35 #	3.9 J	0.68 J	U	U	U	U	U
2-Butanone (MEK)	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroform	7	U	U	U	U	U	0.36 J	U	U	U	0.40 J	U	U	U	U	U
1 1 1-Trichloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Carbon tetrachloride	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzene	1	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 2-Dichloroethane	0.6	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Trichloroethene	5	18 #	30 #	77 #	130 #	33 #	33 #	120 #	180 #	160 #	36 #	32	0.85 J	4.8 J	3.5 J	25 #
1 2-Dichloropropane	1	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromodichloromethane	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
cis-1 3-Dichloropropene	0.4 [3]	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Methyl-2-pentanone (MIBK)		U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
trans-1 3-Dichloropropene	0.4 [3]	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1 2-Trichloroethane	1	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Tetrachloroethene	5	0.58 J	7.0 #	0.35 J	2.8 J	1.5 J	3.2 J	U	UM	6.4 J #	U	U	U	U	0.37 JM	0.47 J
2-Hexanone	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Dibromochloromethane	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chlorobenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Ethylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Styrene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromoform	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1 2 2-Tetrachloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Xylenes (total)	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Total VOC's		18.58	37	77.35	153.8	36.5	36.56	127.6	222.7	174.76	37.08	32	0.85	4.8	3.87	25

[1] - Volatile Organic Compounds (VOCs), Semivolatile Organic Compounds (SVOCs), & Polychlorinated Biphenyls (PCBs).

[2] - NYSDEC Division of Water Technical & Operational Guidance Series (1.1.1) Ambient Water Quality Standards & Guidance Values & Groundwater Effluent Limitations (TOGS) Class GA Standards & Guidance Values

[3] - Standard applies to the sum of cis- & trans-1,3-dichloropropene.

[G] - Guidance Value

- Exceeds applicable NYSDEC TOGS Class GA Standard

Dry wells - 13, 18, 09

U - Analyte was not detected at or above the reporting limit.

B - Compound was found in the blank.

J - Result (Organic) is an estimated value below the reporting limit or a tentatively identified compound (TIC).

M - Manually integrated compound. Analytical instrument misjudged the shape of the chromatogram peak, so the analyst manually determined its shape.

ND - Not Detected

Table 2. Groundwater Sample Analysis Results, VOCs. P&S Boyd Ave BCP Site No C734102 Remedial Investigation, Nov 2007.

Sample Number Collection Date Screened Interval Analyte	TOGS [2] GW Standards ug/l (ppb)	MW05-20 11/20/07 4' -14.5' bgs	MW05-21 11/20/07 4' - 11' bgs	MW05-22 11/20/07 7' - 21.5' bgs	MW05-23 11/19/07 3.8' - 10.3' bgs	MW05-24 11/20/07 3.5' - 5.5' bgs	MW05-25 11/26/07 14' - 19' bgs	MW05-26 11/26/07 4' -19' bgs	MW05-27 11/26/07 9' - 19' bgs	MW05-28 11/26/07 9.5' - 24.5' bgs	BR07-29 11/26/07 17' - 22' bgs	OB07-30 11/26/07 3.5' - 6.5' bgs	BR07-30 11/27/07 18' - 23' bgs	BR07-31 11/27/07 15' - 20' bgs	BR07-32 11/26/07 14.5' - 19.5' bgs
VOCs (8260)		U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloromethane		U	U	U	U	U	U	U	U	U	U	U	U	U	U
Vinyl chloride	2	0.36 J	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromomethane	5	U	U	U	U	U	U	U	U	U	U	U	U	0.68 JM	U
Chloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1-Dichloroethene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Carbon disulfide	60 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Acetone	50 G	U	U	2.0 J	U	U	UM	U	U	UM	8.6 JMB	UM	UM	UM	U
Methylene chloride	5	U	U	U	U	U	1.6 JMB	U	U	U	UM	U	U	U	U
trans-1 2-Dichloroethene	5	0.96 J	0.22 J	U	U	U	U	U	U	U	U	U	U	0.37 JM	U
1 1-Dichloroethane	5	U	0.72 J	U	U	U	U	U	U	U	U	U	U	0.44 JM	U
cis-1 2-Dichloroethene	5	1.2 J	8.9 #	U	U	0.53 J	20 J #	U	U	U	10 J #	2.7 J	1,300 J #	21 #	U
2-Butanone (MEK)	50 G	U	U	U	3.8 J	U	U	U	U	U	U	U	U	U	U
Chloroform	7	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1 1-Trichloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Carbon tetrachloride	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzene	1	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 2-Dichloroethane	0.6	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Trichloroethene	5	U	9.0 #	U	U	2.6 J	300 #	U	U	0.84 J	250 #	7.4 #	34,000 #	7.1 #	7.6 #
1 2-Dichloropropane	1	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromodichloromethane	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U
cis-1 3-Dichloropropene	0.4 3	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Methyl-2-pentanone (MIBK)		U	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
trans-1 3-Dichloropropene	0.4 3	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1 2-Trichloroethane	1	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Tetrachloroethene	5	U	56 #	U	U	U	U	U	U	U	U	U	U	U	U
2-Hexanone	50 G	U	U	U	U	U	U	U	U	U	U	U	U	30 #	UM
Dibromochloromethane	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chlorobenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Ethylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Styrene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromoform	50 G	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1 1 2 2-Tetrachloroethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Xylenes (total)	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Total VOC's		2.52	74.84	2	3.8	3.13	321.6	0	0	0.84	268.6	10.1	35300	59.59	7.6

[1] - Volatile Organic Compounds (VOCs), Semivolatile Organic Compounds (SVOCs), & Polychlorinated Biphenyls (PCBs).

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[3] - Standard applies to the sum of cis- & trans-1,3-dichloropropene.

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- Exceeds applicable NYSDEC TOGS Class GA Standard

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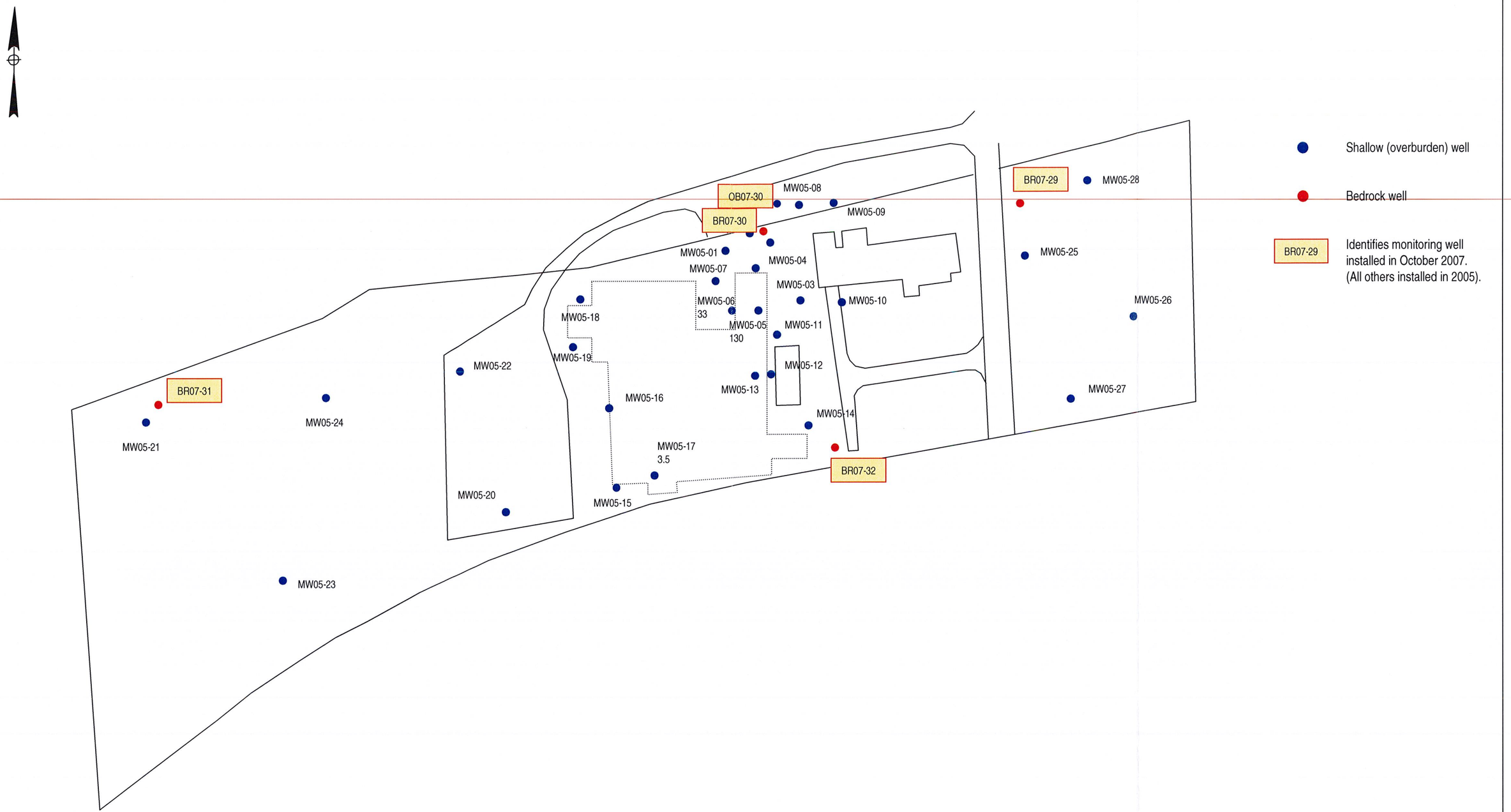
ND - Not Detected



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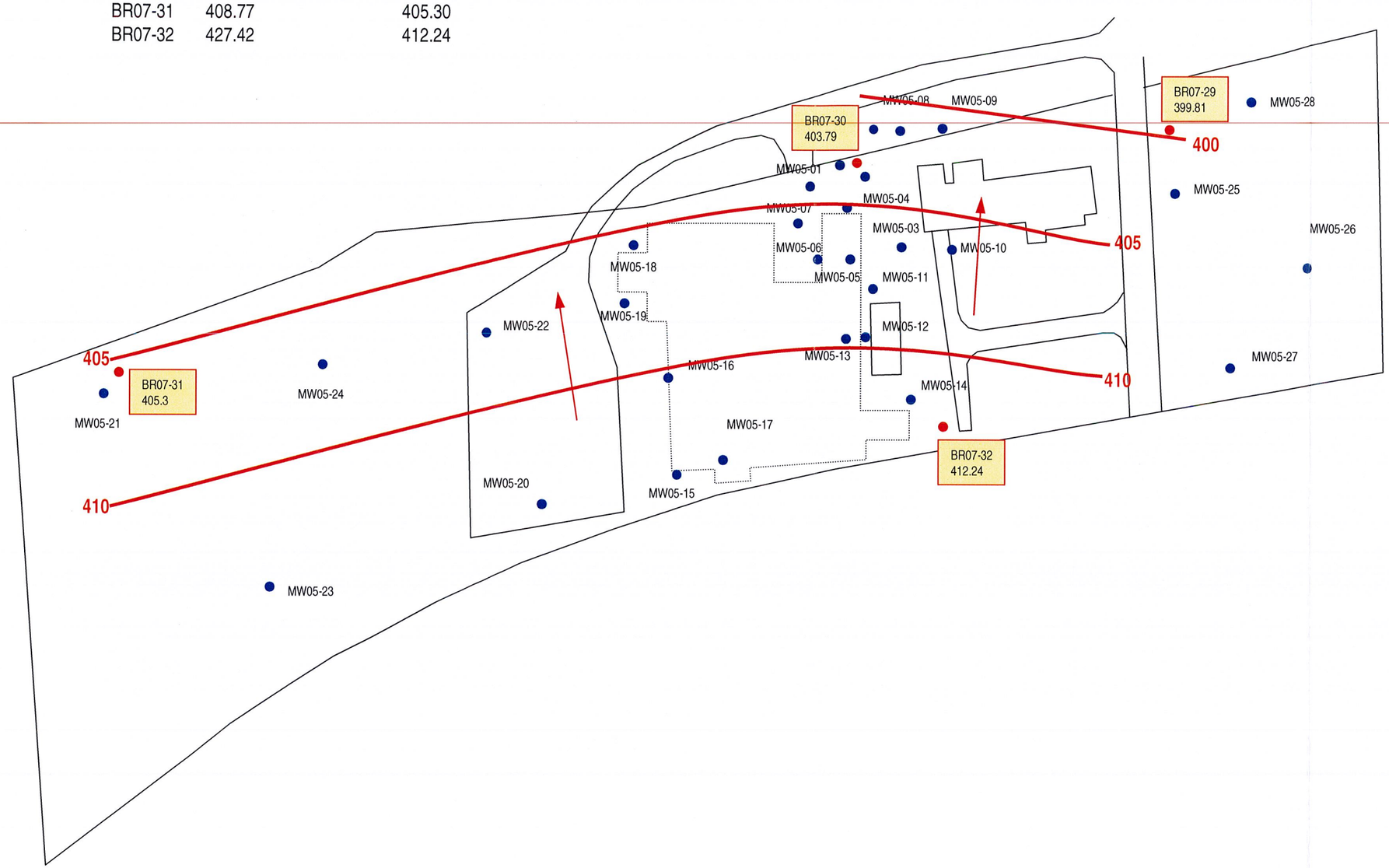
Syracuse, New York

Jan 2008 N5005

P&S BOYD AVE SITE
35 and 50 BOYD AVENUE
SOLVAY, NEW YORK

FIGURE 1
MONITORING WELL LOCATIONS

Well I.D.	Top of PVC Elevation (ft)	Groundwater Elevation (ft)
BR07-29	416.56	399.81
BR07-30	415.84	403.79
BR07-31	408.77	405.30
BR07-32	427.42	412.24



Shallow (overburden) well

Bedrock well

BR07-29 399.81 — Well ID, Groundwater Elev (ft)

Groundwater Elev. Contour (ft)

Groundwater Flow

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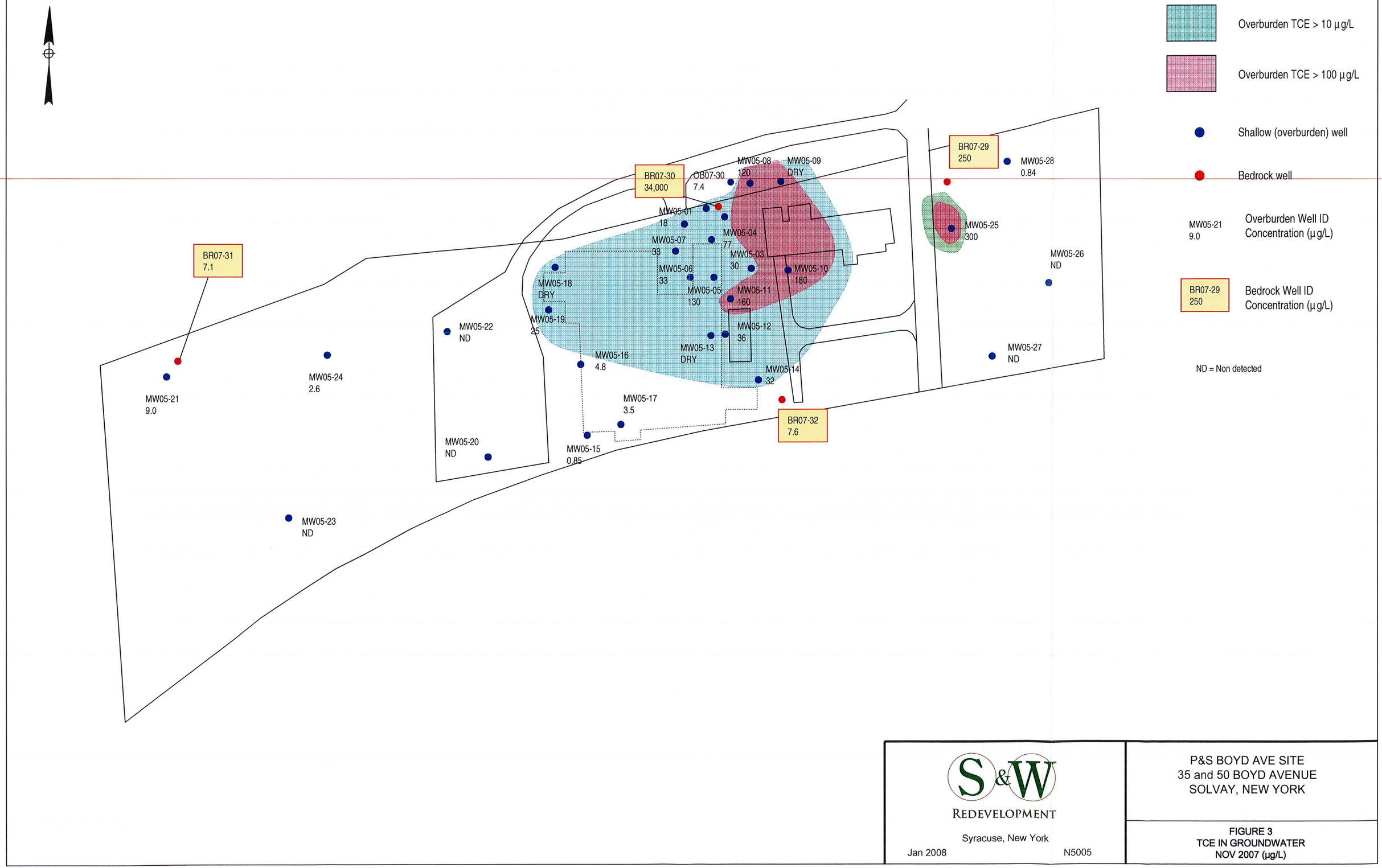
Jan 2008 N5005

P&S BOYD AVE SITE
35 and 50 BOYD AVENUE
SOLVAY, NEW YORK

FIGURE 2
BEDROCK GROUNDWATER CONTOURS
NOV 2007



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Syracuse, New York

Jan 2008 N5005

P&S BOYD AVE SITE
35 and 50 BOYD AVENUE
SOLVAY, NEW YORK

FIGURE 3
TCE IN GROUNDWATER
NOV 2007 (µg/L)