day
DAY ENVIRONMENTAL, INC.

ENVIRONMENTAL CONSULTANTS
AN AFFILIATE OF DAY ENGINEERING, P.C.

January 27, 2009

Mr. Bart Putzig, P.E.
Division of Environmental Remediation
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9519

RE: NYSDEC Site #C828125
225-405 Mount Hope Avenue
Rochester, New York

Dear Mr. Putzig:

This letter serves as an Interim Remedial Measure Work Plan (IRM Work Plan), and is being provided to the New York State Department of Environmental Conservation (NYSDEC) to address remediation of four transformer areas and two surface soil areas located on the east side of the existing buildings at the above-referenced property (Site). Remediating these items is not considered a significant part of the remedy for this NYSDEC Brownfield Cleanup Program (BCP) project. The purpose of the IRM is to expedite the remediation of these areas so that demolition of the existing buildings can then be started.

The location of the Site is shown on the enclosed Figure 1, and the location of the four transformer areas and two surface soil areas on the Site to be remediated are shown on Figure 2.

1.0 BACKGROUND

A summary of existing information pertaining to the transformer areas and two surface soil areas to be addressed by this IRM Work Plan are provided in Subsections 1.1 and 1.2, respectively.

1.1 Transformer Areas

The four transformers located at buildings addressed as 225, 285, 345, and 385 Mt. Hope Avenue contain or contained transformer oil with polychlorinated biphenyl (PCB) concentrations of 20,400 milligram/kilogram (mg/kg) or parts per million (ppm), 580 mg/kg, 2,880 mg/kg, and 1,340,000 mg/kg, respectively. As such they are, or were, considered "PCB Transformers" (i.e., contain 500 ppm or greater of PCBs). The locations of these transformers are shown on the enclosed Figure 2. The transformer areas are located in sidewalk vault structures underneath exterior concrete stairwells.

345 Mt. Hope Avenue

On July 25, 2005, the approximate 266-gallon fluid capacity PCB transformer at the 345 Mt. Hope Avenue Building was reported leaking PCB fluid. The appropriate regulatory agencies were notified, the transformer and its contents were removed, the impacted media (e.g., soil, building and pavement materials) were remediated to an acceptable interim level, and the removed materials were disposed off-site. As a result of the corrective actions taken, the NYSDEC closed its spill file

40 COMMERCIAL STREET
ROCHESTER, NEW YORK 14614-1008
(585) 454-0210
FAX (585) 454-0825

www.dayenvironmental.com

60 EAST 42nd STREET, SUITE 1641
NEW YORK, NEW YORK 10165-1617
(212) 986-8645
FAX (212) 986-8657

#0550701 for this spill incident on July 27, 2005. The spill incident and response actions taken were documented in a letter report prepared by Day Environmental, Inc. (DAY), dated September 14, 2005. A copy of the letter report and spill closure documentation are attached in Appendix A. As shown, the results of confirmatory samples indicate one concrete chip sample (designated as C-1) that was collected from the floor of the sidewalk vault structure (i.e., concrete transformer pad) contained 11 mg/kg or ppm of PCBs, and it was agreed that the impacted concrete floor of this sidewalk vault would be addressed when the existing building was demolished. A new PCB-Free transformer was subsequently installed within the sidewalk vault at the 345 Mt. Hope Avenue building.

225 Mt. Hope Avenue

On September 16, 2005, the approximate 266-gallon fluid capacity PCB transformer at the 225 Mt. Hope Avenue Building was reported leaking PCB fluid. The appropriate regulatory agencies were notified, the transformer and it contents were removed, the impacted media (e.g., soil, debris, and building materials) were remediated to an acceptable interim level, and the removed materials were disposed off-site. As a result of the corrective actions taken, the NYSDEC closed its spill file #0551001 for this spill incident on October 13, 2005. The spill incident and response actions taken were documented in a letter report prepared by DAY, dated October 28, 2005. A copy of the letter report and spill closure documentation are attached in Attachment B. As shown, the results of confirmatory samples indicate one wipe sample (designated as V8) that was collected from the northeast portion of the transformer vault curbing contained 28 micrograms/100cm^2 (ug/100cm^2) of PCBs and it was agreed that the impacted curbing could be encapsulated for the time being and further addressed when the existing building was demolished. It was also agreed that further evaluation of the concrete and soil under the transformer pad edges would be addressed. A new PCB-Free transformer was subsequently installed within the sidewalk vault at the 225 Mt. Hope Avenue building.

285 and 385 Mt. Hope Avenue

PCB fluid releases have not been reported from the approximate 266-gallon fluid capacity PCB transformers located at 285 and 385 Mt Hope Avenue.

The IRM is based on the self-implementing requirements for PCB remediation being used for these locations, in accordance with United States Environmental Protection Agency (USEPA) 40 CFR §761.61(a). USEPA regulations require high occupancy areas to meet a clean-up level of $\leq$ 1 ppm without further conditions. Based on the stated future use of the Site (residential), the transformer areas will require clean-up to a level that meets the definition of a high occupancy area.

1.2 Surface Soil Areas

As a part of the BCP Remedial Investigation, eight (8) surface soil samples were collected at the Site. These samples were analyzed for full target compound list/target analyte list (TCL/TAL) parameters. Two small areas of surface soil that would be affected by building demolition (characterized by samples DAYSS-04 and DAYSS-06) contain concentrations of semi-volatile organic compounds (SVOCs) at concentrations exceeding NYSDEC Part 375 Restricted Residential Soil Cleanup Objectives (SCOs). Specific SVOCs that exceeded the Part 375 Restricted Residential SCOs included: benzo(a)anthracene; chrysene; benzo(b)fluoranthene; benzo(k)fluoranthene; benzo(a)pyrene; indeno(1,2,3-cd)pyrene; and

dibenzo(a,h)anthracene (refer to Figure 2). Surface soil sample DAYSS-04 also contained the metal mercury at a concentration above NYSDEC Part 375 SCOs. These two areas are designated as Area A and Area B, respectively. The areas and the detected specific SVOC and mercury concentrations that exceeded Part 375 Restricted Residential SCOs are shown on Figure 2.

- Area A (where surface soil sample DAYSS-04 was collected) is approximately 21 feet long by 3.5 feet wide with an assumed depth of 1.0 foot, totaling 2.7 cubic yards (i.e., 4.5 tons).
- Area B (where surface soil sample DAYSS-06 was collected) is approximately 20.5 feet long by 3.1 feet wide with an assumed depth of 1.0 foot, totaling 2.4 cubic yards (i.e., 3.9 tons).

2.0 IRM ACTIVITIES

The IRM Activities that are proposed for the four transformer areas and two surface soil areas are outlined in the following subsections. DAY will document the field activities outlined herein for subsequent use in preparing a Final Engineering Report (FER).

2.1 Transformer Areas

DAY will prepare and provide the required 30-day notification [as defined in §761.61(a)(3)] in writing to the regional office of the USEPA office, prior to the date that the clean-up of the 225 and 345 Mt Hope Avenue transformer areas begins. The NYSDEC, and the Monroe County Department of Public Health (MCDPH) will also be notified prior to the date of the clean up. Within 30-calendar days of receiving the notification, the USEPA Regional Administrator should respond in writing approving or disapproving of the self-implementing clean up, or requiring additional information.

Since PCB fluid releases have not been identified and reported from the transformers located at 285 and 385 Mt Hope Avenue, the USEPA, NYSDEC, and MCDPH do not require notification of removal of these PCB transformers from service. However, to facilitate quick remediation in the event a past PCB release is identified upon removal of these transformers, this IRM Work Plan, that includes the guidance on how each of the four transformer areas are to be addressed, will be provided to the USEPA at the time of the 30-day notification for the 225 and 345 Mt. Hope Avenue transformer areas.

The scope of work required for each transformer area is provided below.

345 Mt. Hope Avenue

Power to the current PCB-Free transformer at the 345 Mt. Hope Avenue location will be turned off and disconnected. This transformer will then be removed. An approximate 5-foot by 5-foot area of concrete from the center of the transformer pad (i.e., assuming that the location C2 is the approximate center) will then be removed. The depth of the concrete is unknown, but is presumed to be 1-foot thick; thus, it is assume approximately 1.0 cubic yard of concrete will be removed.

Once the concrete pad is removed, a DAY representative will visually observe and document the underlying soil for evidence of staining. If staining is observed in the underlying soil, the stained soil will be removed until staining is not visible.

In accordance with 40 CFR §761.61(a)(5) and other applicable regulations, the removed materials will be assumed to be PCB-impacted (i.e., ≥50 ppm PCBs), and will be transported and disposed at an approved TSCA and hazardous waste treatment/disposal facility. As an alternative, waste materials may be sampled and analyzed in accordance with §§761.283, 761.286, and 761.292 to determine the PCB concentration. Based on measured PCB concentrations, different disposal options would be evaluated (e.g., dispose as a non-hazardous waste instead of as a PCB-impacted waste), and would be carried out in accordance with applicable regulations.

Subsequent to removal of the concrete transformer pad and/or soil, discrete confirmatory soil samples will be collected. Sampling to verify the clean-up of bulk PCB remediation wastes will be completed in accordance with 40 CFR 761, Subpart O. Based on the presumed size of the excavation, it is anticipated that 7 samples, with a minimum of three samples for each type of bulk PCB remediation waste, will be collected using a square-based grid system as stated in 40 CFR §761.283. In accordance with 40 CFR §761.286, at each selected sampling location, at least 20 milliliters volume of soil (or concrete if remaining) will be collected to a maximum depth of 7.5 centimeters (about 3 inches) using a dedicated disposable core sampler having a diameter ≥ 2 centimeters and ≤ 3 centimeters (i.e., about 1 inch diameter). Sampling equipment that will be reused (i.e., is not disposable) shall be decontaminated between samples by following the 40 CFR 761 Subpart S - Double Wash/Rinse Method for Decontaminating Non-Porous Surfaces. Mitkem Laboratories (Mitkem), a NYSDOH Environmental Laboratory Approved Program (ELAP) laboratory, will analyze the samples for PCBs using Analytical Laboratory Services Protocol (ASP) Method 8082, and the results will be provided in a Category B deliverables report. The test results will be compared to the Restricted Residential Soil Cleanup Objective (SCO) of 1.0 ppm that is referenced in the NYSDEC document titled NYCRR Part 375 Environmental Remediation Programs. This cleanup level is the same as that listed in §761.61 for high occupancy areas that applies to soil and concrete.

225 Mt. Hope Avenue

Power to the current PCB-Free transformer at the 345 Mt. Hope Avenue location will be turned off and disconnected. This transformer will then be removed. The curbing from the east edge of the transformer pad (where sample V8 previously contained PCBs above regulatory criteria) will be removed. The curbing is approximately 7.5-foot long and 0.5-foot wide and is assumed to be 1.5 feet thick (i.e., about 0.2 cubic yard).

Once the curbing is removed, a DAY representative will visually observe and document the underlying soil and concrete transformer pad edges for evidence of staining. If staining is observed, the stained underlying soil and/or concrete transformer pad, etc. will be removed until staining is not visible.

In accordance with 40 CFR §761.61(a)(5) and other applicable regulations, the removed materials will be assumed to be PCB-impacted (i.e., ≥50 ppm PCBs), and will be transported and disposed at an approved TSCA and hazardous waste treatment/disposal facility. As an alternative, waste materials may be sampled and analyzed in accordance with §§761.283, 761.286, and 761.292 to determine the PCB concentration. Based on measured PCB concentrations, different disposal

options would be evaluated (e.g., dispose as a non-hazardous waste instead of as a PCB-impacted waste), and would be carried out in accordance with applicable regulations.

Subsequent to removal of the concrete curb, soil, and/or concrete transformer pad, discrete confirmatory soil samples will be collected. Sampling to verify the clean-up of bulk PCB remediation wastes will be completed in accordance with 40 CFR 761, Subpart O. Based on the presumed size of the excavation, it is anticipated between 3 and 7 samples, with a minimum of three samples for each type of bulk PCB remediation waste, will be collected using a square-based grid system as stated in 40 CFR §761.283. In accordance with 40 CFR §761.286, at each selected sampling location, at least 20 milliliters volume of soil (or concrete if remaining) will be collected to a maximum depth of 7.5 centimeters (about 3 inches) using a dedicated disposable or drill core sampler having a diameter $\geq$ 2 centimeters and $\leq$ 3 centimeters (i.e., about 1 inch diameter). Sampling equipment that will be reused (i.e., is not disposable) shall be decontaminated between samples by following the 40 CFR 761 Subpart S - Double Wash/Rinse Method for Decontaminating Non-Porous Surfaces. Mitkem will analyze the samples for PCBs using ASP Method 8082, and the results will be provided in a Category B deliverables report. The test results will be compared to the Restricted Residential SCO of 1.0 ppm, which is the same cleanup level listed in §761.61 for high occupancy areas that applies to soil and concrete.

285 and 385 Mt. Hope Avenue

The protocol described below will be used at the 285 Mt. Hope Avenue transformer area and at the 385 Mt. Hope Avenue transformer area.

The current PCB transformers from these locations, their contents (i.e., the reported capacity of each transformer is 266 gallons), and any debris will be removed, transported and treated/disposed in accordance with applicable regulations. A DAY representative will then visually observe and document the concrete surfaces of each transformer pad and adjoining concrete walls, curbing, and surrounding soils for evidence of staining. If staining is observed, an initial clean up of the concrete surface will be implemented using the decontamination provisions identified in 40CFR761.79 by using an appropriate solvent [i.e., as performance-based organic decontamination fluids (PODFs)]. Approved PODFs include: kerosene, diesel fuel, terpene hydrocarbons, and mixtures of terpene hydrocarbons and terpene alcohols.

If staining is still observed on a transformer pad or other concrete surface after the initial cleaning using a PODF, or if the initial cleanup of concrete surfaces is deemed not appropriate, then the appropriate transformer pad, concrete surface, and/or possibly also underlying soil will be removed until staining is not visible.

In accordance with 40 CFR §761.61(a)(5) and other applicable regulations, the removed materials will be assumed to be PCB-impacted (i.e., $\geq$50 ppm PCBs), and will be transported and disposed at an approved TSCA and hazardous waste treatment/disposal facility. As an alternative, waste materials may be sampled and analyzed in accordance with §§761.283, 761.286, and 761.292 to determine the PCB concentration. Based on measured PCB concentrations, different disposal options would be evaluated (e.g., dispose as a non-hazardous waste instead of as a PCB-impacted waste), and would be carried out in accordance with applicable regulations.

Subsequent to the initial cleaning, or removal of the concrete curb, soil, and/or concrete transformer pad, discrete confirmatory soil samples will be collected. Sampling to verify the clean-up of bulk PCB remediation wastes will be completed in accordance with 40 CFR 761, Subpart O. Based on the presumed size of the excavation, it is anticipated between 3 and 7 samples, with a minimum of three samples for each type of bulk PCB remediation waste, will be collected using a square-based grid system as stated in 40 CFR §761.283. In accordance with 40 CFR §761.286, at each selected sampling location, at least 20 milliliters volume of soil (or concrete if remaining) will be collected to a maximum depth of 7.5 centimeters (about 3 inches) using a dedicated disposable or drill core sampler having a diameter $\geq$ 2 centimeters and $\leq$ 3 centimeters (i.e., about 1 inch diameter). Sampling equipment which will be reused (i.e., is not disposable) shall be decontaminated between samples by following the 40 CFR 761 Subpart S - Double Wash/Rinse Method for Decontaminating Non-Porous Surfaces. Mitkem will analyze the samples for PCBs using ASP Method 8082, and the results will be provided in a Category B deliverables report. The test results will be compared to the Restricted Residential SCO of 1.0 ppm, which is the same cleanup level listed in §761.61 for high occupancy areas that applies to soil and concrete. Wipe samples, if collected, would be compared a decontamination standard of $\leq$10 ug/100cm^2 as referenced in §761.61(a)(4)(iii) that applies to high occupancy areas.

2.2 Surface Soil (Areas A and B)

The surface soil at Area A and Area B will be removed, transported, and disposed in accordance with applicable regulations. It is assumed that a total of approximately 5.1 cubic yards (or 8.4 tons) of soil will be removed, and that this soil is non-hazardous and can be used as a cover material at a NYSDEC-approved regulated landfill facility.

Additional sampling and analytical laboratory testing of the removed soil will be completed if required for further characterization by the NYSDEC-approved landfill facility. The removed soil will be transported off-site under an appropriate NYSDEC Part 364 permit (i.e., truck with appropriate Part 364 permit) to a NYSDEC-approved regulated landfill facility.

Once the surface soil is removed from Area A and Area B, confirmatory soil samples will be collected. In accordance with guidance in Section 5.4 of DER-10, and since the entire surface soil area is to be removed (i.e., sidewalls abut concrete and/or asphalt), it is anticipated that one bottom sample will be collected from each of the two surface soil removal areas. Based on preliminary probing, it is possible that the surface soil was placed on a concrete slab or other impervious material at each removal areas that are less than 1.0 foot below the existing ground surface. If such conditions are encountered, and the surface soil is completely removed, then confirmatory soil samples will not be collected. If collected, each confirmatory soil sample will be submitted to Mitkem. Mitkem will analyze the samples for SVOCs using Method OLM04.3. The confirmatory sample from Area A would also be analyzed for the metal mercury using ASP Method ILM04.1. The confirmatory soil sample results will be provided in a Category B deliverables report. The test results will be compared to NYSDEC part 375 Restricted Residential SCOs and background ranges established for the Rochester,. New York area, which are the same criteria used in the Remedial Investigation for this project.

3.0 Reporting

Information pertaining to implementation of the IRM Work Plan scope will be included in monthly progress reports. The IRM work will also be incorporated into a FER for the project.

4.0 Health and Safety

The ancillary portions of the Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) included in Appendix D of the August 2004 RI Work Plan will be implemented during the work described in Section 2.0 of this IRM Work Plan. Supplemental health and safety protocols are included in Appendix C, which will be implemented during the PCB remediation work.

As an alternative, contractors may develop their own task-specific HASP for use during activities that are covered by this IRM Work Plan; however, the contractor's HASP must be approved by appropriate regulatory agencies prior to the contractor conducting its work.

If there are any questions, please contact this office.

Very truly,
Day Environmental, Inc.

Jeffrey A. Danzinger
Project Manager

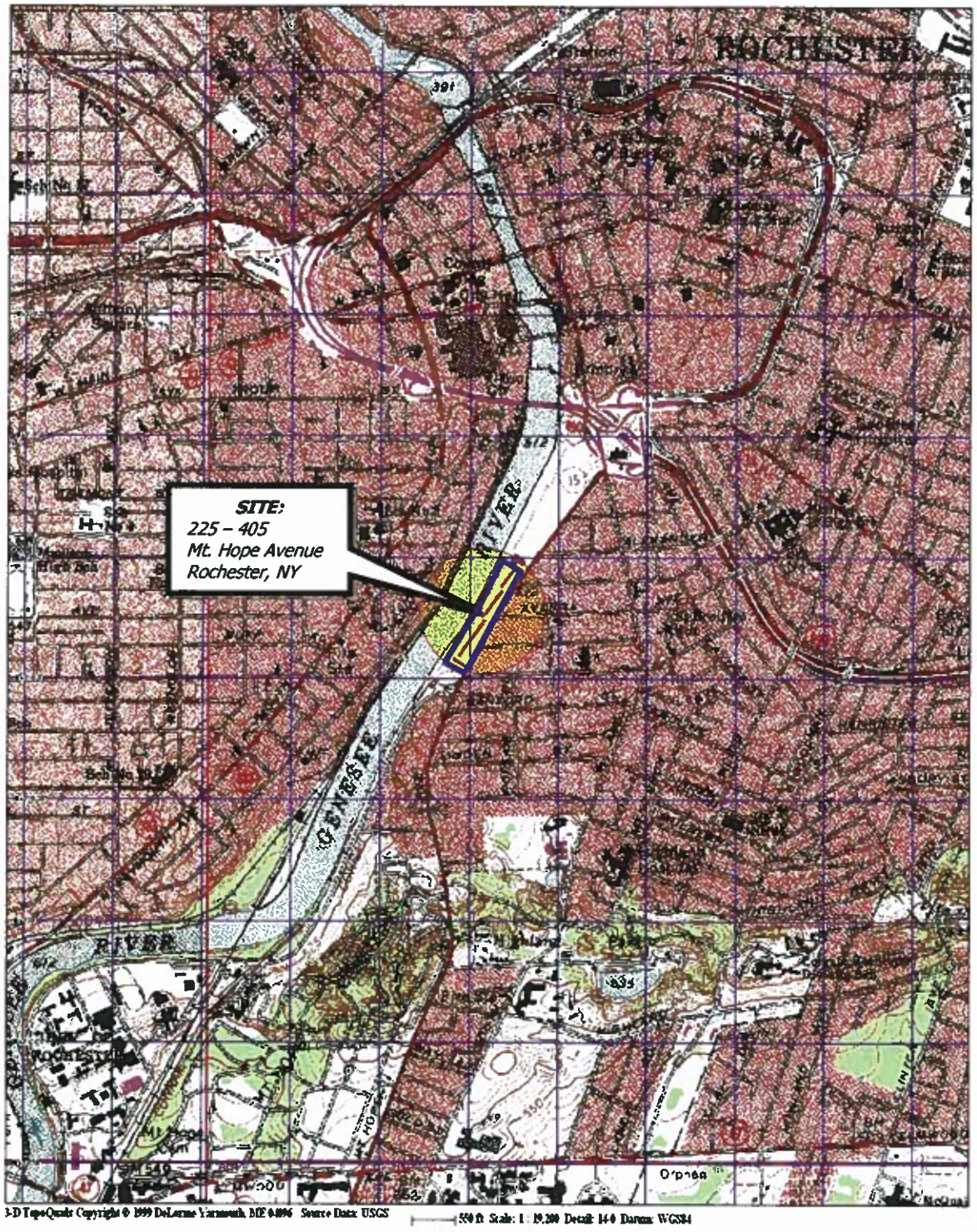
Timothy K. Hampton, P.E.
Vice President

JAD/s

Figure 1 - Project Locus Map
Figure 2 - Components of Interim Remedial Measure Work Plan
Attachment A - Transformer Spill Cleanup Report/Spill Closure Report (345 Mt. Hope Avenue)
Attachment B - Transformer Spill Cleanup Report/Spill Closure Report (225 Mt. Hope Avenue)
Attachment C - Supplemental Health and Safety Protocols for PCB Remediation Work

cc: Geoff Laccetti (NYSDOH) – w/copy of enclosures
Debbie McNaughton (NYSDOH) – w/copy of enclosures
Jeffrey Kosmala, P.E. (MCDPH) – w/copy of enclosures
Allen Handelman (Erie Harbor, LLC) – w/copy of enclosures
Kelly Cloyd, Ph.D. (NYSDEC) – w/copy of enclosures

JD6284 / 4155R-09

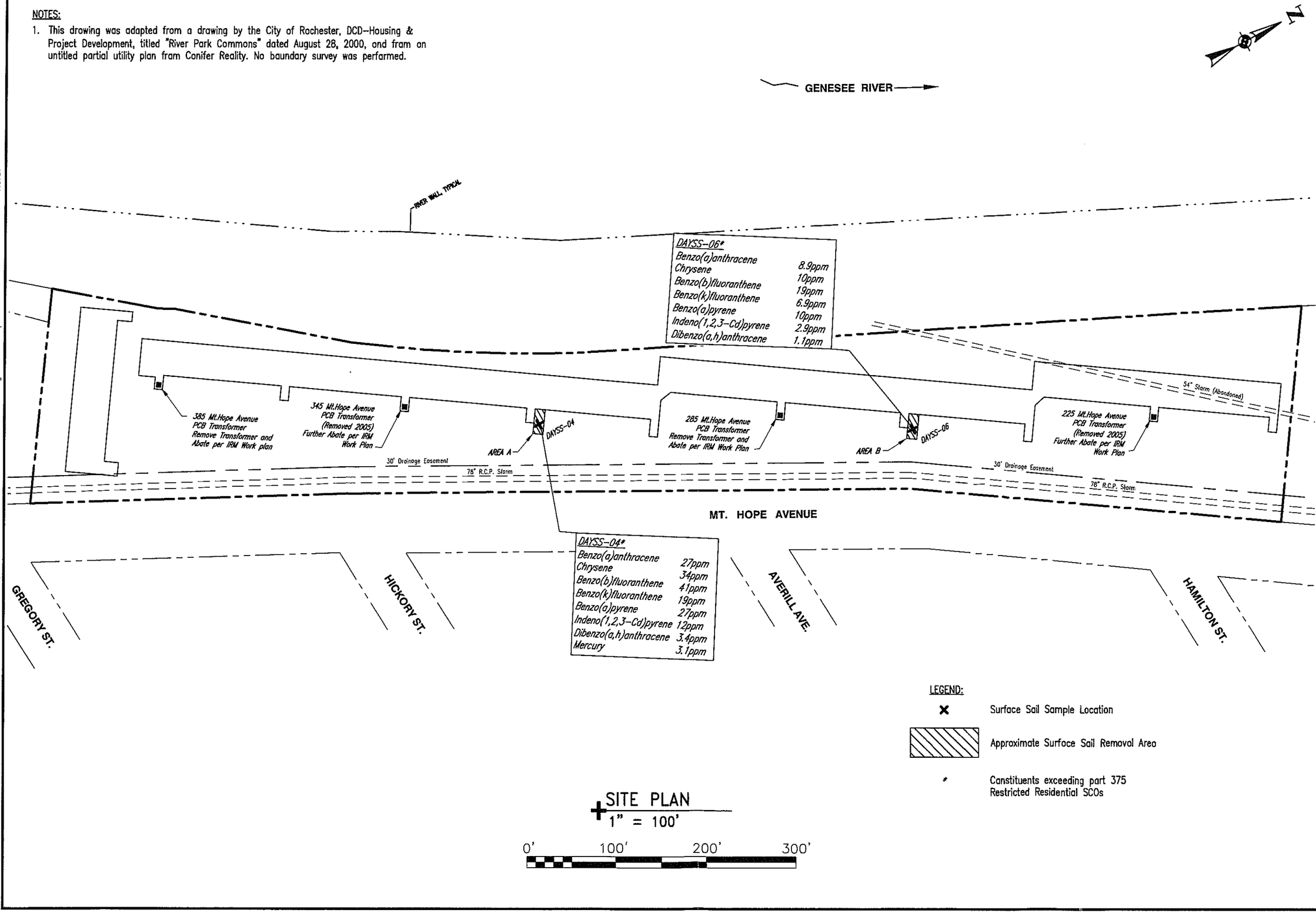


Drawing Produced From: 3-D TopoQuads, DeLorme Map Co., referencing USGS quad maps Rochester East (NY) 1995 and Rochester West (NY) 1995. Site Lat/Long: N43d-8.65' – W77d-36.70'

DATE 01-19-2009 DRAWN BY CPS SCALE 1" = 2000'	day DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14623-2700	PROJECT TITLE 225 - 405 MT. HOPE AVENUE ROCHESTER, NY BROWNFIELD CLEANUP PROGRAM DRAWING TITLE PROJECT LOCUS MAP	PROJECT NO. 4155R-09 FIGURE 1

NOTES:

1. This drawing was adapted from a drawing by the City of Rochester, DCD–Housing & Project Development, titled "River Park Commons" dated August 28, 2000, and from an untitled partial utility plan from Conifer Reality. No boundary survey was performed.



FIELD VERIFIED BY	JAD
DATE	01-2009
DRAWN BY	RJM/CPS
DATE DRAWN	1-19-2009
SCALE	As Noted
DATE ISSUED	1-20-2009

day
DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008
NEW YORK, NEW YORK 10165-1617

PROJECT TITLE
225-405 MT. HOPE AVENUE
ROCHESTER, NEW YORK

BROWNFIELD CLEANUP PROGRAM

DRAWING TITLE
Components Of Interim Remedial Measure Work Plan

PROJECT NO.
4155R-09

FIGURE 2

Ref1:
Ref2:
Ref3:

Xerox432AnsiB–2; 11 x 17
Layout Name: Layout 1
Pen Setting File: 800psFullcolor.ctb

Time Plotted: Tuesday, January 20, 2009 9:48:54 AM
File Name: U:\McPhee\Drawings\Brownfield\4155R–09ErieHo\IRM Site Work Plan.dwg

Attachment A

Transformer Spill Cleanup Report/Spill Closure Report
(345 Mt. Hope Avenue)

day
DAY ENVIRONMENTAL, INC.

ENVIRONMENTAL CONSULTANTS
AN AFFILIATE OF DAY ENGINEERING, P.C.

September 14, 2005

Regional Administrator – Kathleen Callahan
U.S. Environmental Protection Agency – Region 2
290 Broadway
New York, New York 10007-1866

FILE COPY

U.S. Environmental Protection Agency
Region 2
Attn: Leonard Pappalardo
2890 Woodbridge Avenue
Edison, NJ 08837

Mr. Carl Hettenbaugh
New York State Department of
Environmental Conservation
Division of Spills Management
6274 Avon-Lima Road
Avon, New York 14414-9519

Mr. Joseph Albert
Senior Public Health Sanitarian
Monroe County Department of Health
111 Westfall Road
Rochester, New York 14620

RE: PCB Transformer Spill (NRC Spill # 766738; NYSDEC Spill #s 0550701 and 0505160)
345 Mount Hope Avenue, Rochester, New York

On July 25, 2005 at approximately 11 AM EST, a PCB Transformer was observed leaking PCB fluid to the concrete containment and to soil located north of the transformer enclosure located at 345 Mount Hope Avenue, Rochester, New York (refer to Figure 1 included as Appendix A). The fluid was identified as having a PCB concentration of 2,880-milligrams/kilograms (mg/kg). The release was caused by failure of a transformer bushing where the bushing connected through the transformer on the primary (i.e., high voltage) side.

The transformer nameplate indicated a capacity of 266 gallons. Approximately 235 gallons of PCB oil was collected in drums prior to transformer shipment. A second spill of approximately 3 to 5 gallons of PCB oil occurred from a release of Clean Harbors' pump line to the driveway during cleanup activities (from a poor connection of the tubing to the pump used by the clean-up contractor). Clean Harbors reported this spill to the NYSDEC (Spill # 0505160). The transformer was installed in the early 1970's and there are no records of known activity or topping off of the transformer oil. As such, it is unknown if the transformer contained full capacity at the time of the spill. Based on the above considerations, it is assumed that approximately 27 gallons of oil was released to the transformer containment area and the environment.

40 COMMERCIAL STREET
ROCHESTER, NEW YORK 14614-1008
(585) 454-0210
FAX (585) 454-0825

www.dayenvironmental.com

60 EAST 42nd STREET, SUITE 1641
NEW YORK, NEW YORK 10165-1617
(212) 986-8645
FAX (212) 986-8657

Response / Cleanup – Initial Spill

PCB fluids were released to the containment area surrounding the PCB Transformer and to some soil on the north side of the containment structure. No PCB fluids reached water or storm water drains. No injuries occurred as a result of this spill. The following clean-up actions were completed:

- The transformer was shut down and removed from the contained area for draining and shipment for disposal.
- PCB fluids and PCB-contaminated debris were removed from the transformer containment area. The concrete flooring was cleaned with solvent.
- Soil impacted by PCB fluids was removed to an initial depth of approximately 5-inches.
- Initial confirmatory samples were collected from the clean-up area associated with the initial spill. This included analyzing Wipe Samples A through E, Soil Samples H and I and Concrete Core Samples C1 through C3 for PCBs using Method SW8082.
- Based on the analytical laboratory test results for initial confirmatory soil samples H and I (contained 16 and 4.6 mg/kg PCBs, respectively), further soil removal was completed on August 15, 2005 to a depth of approximately 8-inches until part of an apparent concrete structural footer for the building was encountered, (i.e., no additional soil could be removed in a vertical direction from the spill area).
- The concrete footer was cleaned with solvent, and additional confirmatory Wipe Samples #1 through #4 were collected from concrete surfaces surrounding this additional soil removal area and subsequently tested for PCBs using Method SW8082.
- PCB fluids were removed from the transformer for disposal.

Response / Cleanup – Additional Spilled Material

On July 28, 2005, approximately 3 to 5 gallons of PCB oil was released to concrete and blacktop located east of the transformer containment area due to an inadequate connection of tubing to a pump during the removal of PCB oil from the transformer. Clean Harbors notified the NYSDEC of this additional spilled material (Spill #0505160). The impacted concrete pavers/slabs and asphalt pavement were removed. Confirmatory Soil Samples F, G, J, L and M were then collected from the clean-up area and test for obtained from the additional PCB spill area, and these samples were subsequently tested for PCBs using Method SW8082. Although documented on the Chain-of-Custody (COC), Sample K was not collected from the clean up area for PCB analysis. The laboratory documented this discrepancy on the COC by not assigning a sample number to Sample K in the 'internal use only' column.

The Site Sketch (Figure 1 in Appendix A) shows the approximate areas impacted by the initial PCB oil release and the secondary PCB oil release that occurred during clean-up operations (i.e., depicted as shaded areas). Figure 1 also indicates the approximate locations of confirmatory wipe samples, concrete core samples, and soil samples collected as part of the clean up. PCB sample results are also indicated on the Site Sketch. Analytical laboratory test results and executed chain of custody documentation for the confirmatory samples are enclosed in Appendix B.

With the exception of concrete core sample C2, PCB contaminated media were have been remediated to "non-detect" levels. Discussions were held with Mr. Carl Hettenburgh of the New York State Department of Environmental Conservation (NYSDEC) and Mr. Joseph Albert of the Monroe County Health Department regarding the 11-mg/kg PCB sample result in the concrete core sample C2 under the transformer. It was agreed that the concrete may be encapsulated and the new PCB-Free transformer could be placed on the concrete. The transformer is fenced within the vault, limiting accessibility. The

concrete will be managed as PCB-Contaminated material when the building is demolished. Building demolition is planned for 2006.

Disposal

PCB fluids, PCB Debris and the PCB Transformer were shipped from the site on August 1, 2005. Copies of the manifests are attached in Appendix C. Certificates of destruction have not been received at this date. However, a discussion with Clean Harbors has indicated the final disposition of PCB materials generated from the site is as follows:

- Drums of PCB oils will be sent to a PCB incinerator located in Deer Park, Texas.
- Debris of spill clean-up material and contaminated soil will be sent to the Clean Harbors approved hazardous waste landfill in Grassy Mountain, Utah
- The PCB Transformer will be disassembled and solvent washed at the Clean Harbors Ashtabula, Ohio facility and then smelted after complete cleaning. Wash waters created during solvent washing will be sent to a PCB incinerator located in Deer Park.

If there are any questions, please contact this office; Mr. Allen Handelman, Project Manager associated with Conifer Realty at (585) 324-0512; or Ms. Magdelena Medina, Property Manager at the 345 Mount Hope Avenue location at (585) 546-1240.

Sincerely,

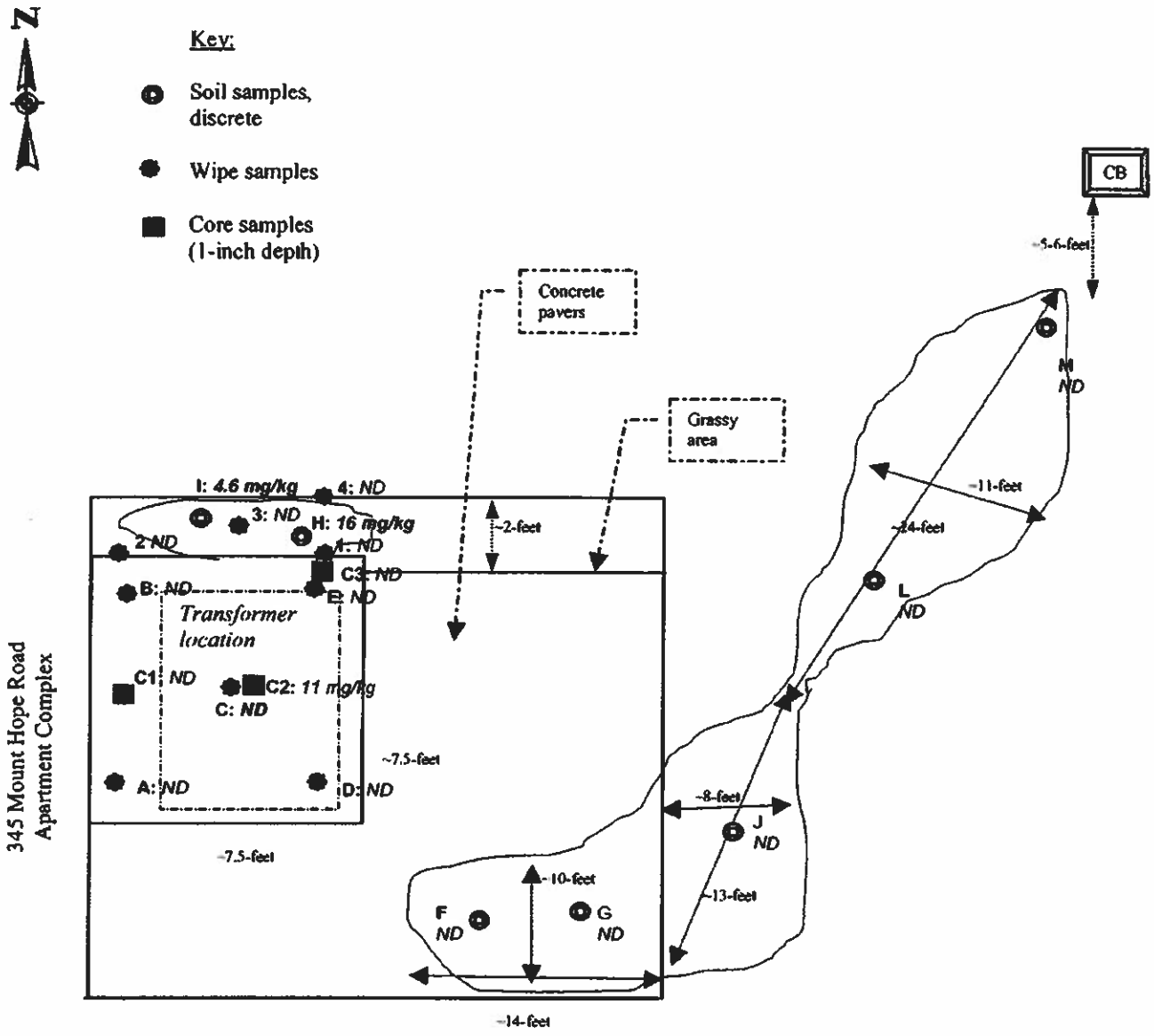
Christie Sunderrajan, E.I.T., CHMM
Sr. Professional

Jeffrey D. Danzinger
Project Manager

/CS
Enc

cc: Allen Handelman (Conifer Realty)

APPENDIX A
Site Sketch



Notes:

1) Site sketch based on observations made at the time of the site visit performed by a Day Environmental, Inc. representative in July and August 2005. Shaded areas are approximate locations of impact of released PCB fluid that was subsequently cleaned up.
2) The sketched area is only a representation of the affected area, and does not depict the actual property boundaries of the site.

DATE 8/25/05 DRAWN BY CMS SCALE Not to Scale	**day** DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14614	PROJECT TITLE PCB Transformer Spill Location 345 Mount Hope Road Rochester, New York PCB Spill Response DRAWING TITLE SITE SKETCH	PROJECT NO. 3687S-05 FIGURE 1

APPENDIX B
Analytical Results

Upstate Laboratories, Inc.
Shipping: 6034 Corporate Dr. * E. Syracuse, NY 13057-1017 * (315) 437-0255 * Fax (315) 437-1209
Mailing: Box 289 * Syracuse, NY 13206
Albany (518) 459-3134 * Binghamton (607) 724-0478 * Buffalo (716) 649-2533
Rochester (585) 436-9070 * New Jersey (201) 343-5353 * South Carolina (864) 878-3280

Mr. Anthony Napoli
Clean Harbors Env. Svcs., Inc.
14 Corporate Circle
E. Syracuse, NY 13057

Monday, August 01, 2005

RE: SY005875, Riverpark Commons

Order No.: U0507493

Dear Mr. Anthony Napoli:

Upstate Laboratories, Inc. received 18 sample(s) on 7/29/05 for the analyses presented in the following report.

All analytical data conforms with standard approved methodologies and quality control. Our quality control narrative will be included should any anomalies occur.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your samples. Samples will be disposed of approximately one month from final report date.

Should you have any questions regarding these tests, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

AJS (PFF)

Anthony J. Scala
President/CEO

Upstate Laboratories, Inc.

Date: *01-Aug-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons
Lab Order: U0507493

Lab ID: U0507493-001 **Collection Date:** 7/28/05 7:45:00 PM
Client Sample ID: A **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Lab ID: U0507493-002 **Collection Date:** 7/28/05 7:50:00 PM
Client Sample ID: B **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Lab ID: U0507493-003 **Collection Date:** 7/28/05 7:55:00 PM
Client Sample ID: C **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Approved By: PFF Date: 8-1-05

Qualifiers:
- `*` Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *01-Aug-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons
Lab Order: U0507493

Lab ID: U0507493-004
Client Sample ID: D
Collection Date: 7/28/05 8:00:00 PM
Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082	(NS503)			Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Lab ID: U0507493-005
Client Sample ID: E
Collection Date: 7/28/05 8:05:00 PM
Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082	(NS503)			Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Lab ID: U0507493-006
Client Sample ID: F
Collection Date: 7/28/05 8:10:00 PM
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082	(SW3550B)			Analyst: FP
Aroclor 1016	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1242	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0018		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	6.02	0.00100		wt%	1	7/29/05

Approved By: PFF
Date: 8-1-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: 01-Aug-05

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons
Lab Order: U0507493

Lab ID: U0507493-007
Client Sample ID: G
Collection Date: 7/28/05 8:15:00 PM
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1242	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0018		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	7.07	0.00100		wt%	1	7/28/05

Lab ID: U0507493-008
Client Sample ID: H
Collection Date: 7/28/05
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1242	16	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0018		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	7.14	0.00100		wt%	1	7/28/05

Approved By: PFF
Date: 8-1-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *01-Aug-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons

Lab Order: U0507493

Lab ID: U0507493-009
Client Sample ID: I
Collection Date: 7/28/05
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0019		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0019		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0019		mg/Kg-dry	1	7/29/05
Aroclor 1242	4.6	0.0019		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0019		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0019		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0019		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	9.88	0.00100		wt%	1	7/29/05

Lab ID: U0507493-010
Client Sample ID: J
Collection Date: 7/28/05 8:18:00 PM
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1242	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0018		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	5.68	0.00100		wt%	1	7/29/05

Approved By: PFF
Date: 8-1-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *01-Aug-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons
Lab Order: U0507493

Lab ID: U0507493-011
Client Sample ID: L
Collection Date: 7/28/05 8:28:00 PM
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082	(SW3550B)			Analyst: FP
Aroclor 1016	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1242	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0018		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	5.82	0.00100		wt%	1	7/29/05

Lab ID: U0507493-012
Client Sample ID: M
Collection Date: 7/28/05 8:30:00 PM
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082	(SW3550B)			Analyst: FP
Aroclor 1016	ND	0.0017		mg/Kg-dry	1	7/29/05
Aroclor 1221	ND	0.0017		mg/Kg-dry	1	7/29/05
Aroclor 1232	ND	0.0017		mg/Kg-dry	1	7/29/05
Aroclor 1242	ND	0.0017		mg/Kg-dry	1	7/29/05
Aroclor 1248	ND	0.0017		mg/Kg-dry	1	7/29/05
Aroclor 1254	ND	0.0017		mg/Kg-dry	1	7/29/05
Aroclor 1260	ND	0.0017		mg/Kg-dry	1	7/29/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	3.86	0.00100		wt%	1	7/29/05

Approved By: PFF
Date: 8-1-05

Qualifiers:
- `*` Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: 01-Aug-05

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons
Lab Order: U0507493

Lab ID: U0507493-013
Client Sample ID: C-1 Transformer Vault
Collection Date: 7/29/05 10:30:00 AM
Matrix: DUST

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0064		mg/Kg	1	7/29/05
Aroclor 1221	ND	0.0064		mg/Kg	1	7/29/05
Aroclor 1232	ND	0.0064		mg/Kg	1	7/29/05
Aroclor 1242	ND	0.0064		mg/Kg	1	7/29/05
Aroclor 1248	ND	0.0064		mg/Kg	1	7/29/05
Aroclor 1254	ND	0.0064		mg/Kg	1	7/29/05
Aroclor 1260	ND	0.0064		mg/Kg	1	7/29/05

Lab ID: U0507493-014
Client Sample ID: C-2 Transformer Vault
Collection Date: 7/29/05 10:40:00 AM
Matrix: DUST

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0072		mg/Kg	1	7/29/05
Aroclor 1221	ND	0.0072		mg/Kg	1	7/29/05
Aroclor 1232	ND	0.0072		mg/Kg	1	7/29/05
Aroclor 1242	11	0.0072		mg/Kg	1	7/29/05
Aroclor 1248	ND	0.0072		mg/Kg	1	7/29/05
Aroclor 1254	ND	0.0072		mg/Kg	1	7/29/05
Aroclor 1260	ND	0.0072		mg/Kg	1	7/29/05

Lab ID: U0507493-015
Client Sample ID: C-3 Transformer Vault
Collection Date: 7/29/05 10:50:00 AM
Matrix: DUST

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: FP
Aroclor 1016	ND	0.0065		mg/Kg	1	7/29/05
Aroclor 1221	ND	0.0065		mg/Kg	1	7/29/05
Aroclor 1232	ND	0.0065		mg/Kg	1	7/29/05
Aroclor 1242	ND	0.0065		mg/Kg	1	7/29/05
Aroclor 1248	ND	0.0065		mg/Kg	1	7/29/05
Aroclor 1254	ND	0.0065		mg/Kg	1	7/29/05
Aroclor 1260	ND	0.0065		mg/Kg	1	7/29/05

Approved By: PFF
Date: 8-1-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *01-Aug-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: SY005875, Riverpark Commons
Lab Order: U0507493

Lab ID: U0507493-016 **Collection Date:** 7/29/05 11:15:00 AM
Client Sample ID: Decon Area **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(NS503)		Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Lab ID: U0507493-017 **Collection Date:** 7/29/05 11:30:00 AM
Client Sample ID: Bucket **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(NS503)		Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Lab ID: U0507493-018 **Collection Date:** 7/29/05 12:00:00 PM
Client Sample ID: Forktruck **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(NS503)		Analyst: FP
Aroclor 1016	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1221	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1232	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1242	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1248	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1254	ND	0.30		µg/wipe	1	7/29/05
Aroclor 1260	ND	0.30		µg/wipe	1	7/29/05

Approved By: PFF Date: 8-1-05

Qualifiers:
- `*` Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

(315) 437 0255 ... Fax 437 1203

Chain of Custody Record

Client: CHES

Client Project # / Project Name:

Client Contact: Tony Napoli

Phone #:

Site Location (city/state): Rochester, NY Riverpark Commons

Special Turnaround Time 24 hr. (Lab Notification required)

Sample Location	Date	Time	Matrix	Grab or Comp.	ULI Internal Use Only U0507493	No. of Containers	1)	2)	3)	4)	5)	6)	7)	8)	9)	10)	Remarks
A	7/25/05	745 pm	wipe	G	-001	1	X										
B	↓	750 pm	"		-002	1	X										Rush 24 hr pcb
C	↓	755	"		-003	1	X										↓
D	↓	800	"		-004	1	X										↓
E	↓	805	"		-005	1	X										↓
F	↓	810	S		-006	1	X	X									↓
G	↓	815	S		-007	1	X	X									↓
H	↓		S		-008	1	X	X									↓
I			S		-009	1	X	X									↓

parameter and method	sample bottle: type	size	pres.
1) pcb			
2) (% Moisture) [illegible]			
3)			
4)			
5)			
6)			
7)			
8)			
9)			
10)			

Sampled by: (Please Print) Anthony Napoli

Company: CHES

ULI Internal Use Only
Delivery (check one):
☐ ULI Sampled
☐ Pickup ☐ Dropoff
☐ CC ______

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
A. Napoli	7/29/05	630	
	7/29/05	0930	Rec'd for lab by: (Signature) K Crump

Note: The numbered columns above cross-reference with the numbered columns in the upper right-hand corner.

Syracuse Rochester Buffalo Albany Binghamton Fair Lawn (NJ)

(315) 437 0255 Fax 437 1209

Chain of Custody Record

Client: CHES	Client Project # / Project Name				
Client Contact: Tony Napoli	Phone #	Site Location (city/state)			
Sample Location: Rochester NY, Riverport Cen.					

Sample	Date	Time	Matrix	Grab or Comp.	ULI Internal Use Only 0507493	No. of Containers	1)	2)	3)	4)	5)	6)	7)	8)	9)	10)	Remarks
J	7/28/05	818	S	G	-010 -001	(1)	X	(X)									24hr.
~~K~~	"	~~823~~	S	6	-0-	1	X										
L	"	828	S	6	-011	(1)	X	(X)									
M	"	830	S	G	-012	(1)	V	(X)									

Special Turnaround Time 24 (Lab Notification required)

parameter and method	sample bottle: type	size	pres.
1) PCB			
2) (% Moisture) 7/29/05			
3)			
4)			
5)			
6)			
7)			
8)			
9)			
10)			

Note: The numbered columns above cross-reference with the numbered columns in the upper right-hand corner.

Sampled by: (Please Print)

Company:

ULI Internal Use Only
Delivery (check one):
☐ ULI Sampled
☐ Pickup ☐ Dropoff
☐ CC ______

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
[signature]	7/29/05	830	
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date 7/29/05	Time 0830	Rec'd for Lab by: (Signature) K Crump

Syracuse Rochester Buffalo Albany Binghamton Fair Lawn (NJ)

Chain of Custody Record

(315) 437 0255 Fax 437 1209

Client: CHES

Client Project # / Project Name: SY005875

Client Contact: Napoli

Phone #:

Site Location (city/state): Rochester, NY Riverpark Commons

Special Turnaround Time 24 Hr. Max. A/Y (Lab Notification required)

Sample Location: Rochester, NY	Date	Time	Matrix	Grab or Comp.	ULI Internal Use Only U0507493	No. of Containers	1)	2)	3)	4)	5)	6)	7)	8)	9)	10)	Remarks
C-1 Transformer Vault	7/29	1030	Dust	G	-013	1	1	X									
C-2 " Vault	"	1040	"	G	-014	1	1	X									
C-3 " Vault	"	1050	"	G	-015	1	1	X									
Decon Area	"	1115	W	G	-016	1	1										
Bucket	"	1130	W	G	-017	1	1										
Forktruck	"	1200	W	G	-018	1											

parameter and method	sample bottle: type	size	pres.
1) pcb			
2) pcb			
3) "			
4) "			
5) "			
6) "			
7)			
8)			
9)			
10)			

Note: The numbered columns above cross-reference with the numbered columns in the upper right-hand corner.

Sampled by: (Please Print) A. Napoli

Company: CHES

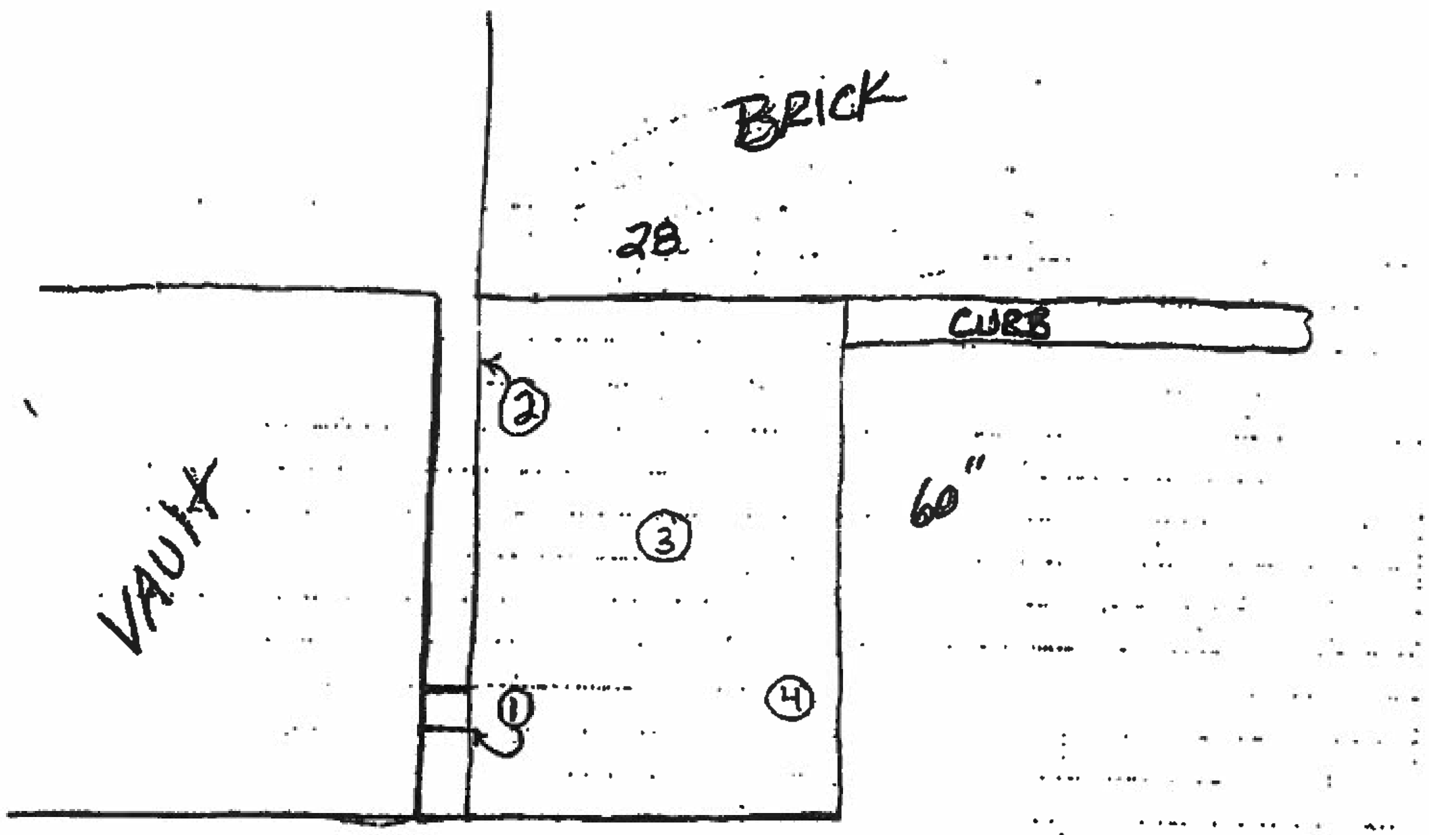
ULI Internal Use Only
Delivery (check one):
☐ ULI Sampled
☐ Pickup ☐ Dropoff
☐ CC ______

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
[signature]	7/29	205	
	7/29/05	2:05	Rec'd for Lab by: (Signature) [signature]

Syracuse Rochester Buffalo Albany Binghamton Fair Lawn (NJ)

SINCE 1911
O'Connell Electric Co.

PROJECT River Park Commons
SUBJECT 345 Mt Hope Ave Roch. NY
CALC BY ______ DATE 8-16-05 SHEET 1 OF 1
CHECKED BY ______ DATE ______ PROJECT NO. ______



SAMPLES
1. Wall under Drain Hole
2. Wall under grade 12" from Brick
3. middle of excavation
4. outside edge opposite Drain

Main Office: 830 Phillips Road • Victor, New York 14564-9747 • 716-924-2176 • Fax 716-924-4973
Buffalo Division: 933 Ransom Road • Lancaster, New York 14086 • 716-675-9010 • Fax 716-686-0586

6034 Corporate Drive • E. Syracuse, NY 13057-1017
(315) 437 0255 Fax 437-1209

Chain Of Custody Record

Client:		Client Project # / Project Name
CLEAN HARBORS		RIVER PARK COMMONS
Client Contact: TONY NAPOLI	Phone #: 463-9101	Site Location (city/state): ROCHESTER, NY
Sample Location: ROCESTER, NY		

Date	Time	Matrix	Grab or Comp.	ULI Internal Use Only: U0508298	No. of Con-tainers	1)	2)	3)	4)	5)	6)	7)	8)	9)	10)	Remarks
						PCB	PCB	PCB	PCB							Special Turnaround Time Standard (Lab Notification required)
8-16				001	1											
				002	1											
				003	1											
				004	1											

parameter and method	sample bottle: type	size	pres.
1) sample 1	wipe	2oz	
2) sample 2	wipe		
3) sample 3	wipe		
4) sample 4	wipe		
5)			
6)			
7)			
8)			
9)			
10)			

Note: The numbered columns above cross-reference with the numbered columns in the upper right-hand corner.

Sampled by: (Please Print) David Harris

Company: CLEAN HARBORS

ULI Internal Use Only
Delivery (check one):
☐ ULI Sampled
☐ Pickup ☐ Dropoff
☐ CC ______

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
David Harris	8/?/05	8:00	Rec'd for Lab by: (Signature) P. [illegible]

Syracuse Rochester Buffalo Albany Binghamton Fair Lawn (NJ)

Upstate Laboratories, Inc.

Date: *06-Sep-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: River Park Commons
Lab Order: U0508298

Lab ID: U0508298-001
Client Sample ID: Sample #1
Collection Date: 8/16/05
Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1221	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1232	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1242	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1248	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1254	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1260	ND	0.30		µg/wipe	1	8/18/05

Lab ID: U0508298-002
Client Sample ID: Sample #2
Collection Date: 8/16/05
Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1221	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1232	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1242	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1248	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1254	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1260	ND	0.30		µg/wipe	1	8/18/05

Lab ID: U0508298-003
Client Sample ID: Sample #3
Collection Date: 8/16/05
Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1221	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1232	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1242	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1248	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1254	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1260	ND	0.30		µg/wipe	1	8/18/05

Approved By: _____ **Date:** _____

Qualifiers:

*	Low Level	**	Value exceeds Maximum Contaminant Value
B	Analyte detected in the associated Method Blank	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	S	Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *06-Sep-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: River Park Commons
Lab Order: U0508298

Lab ID: U0508298-004
Client Sample ID: Sample #4
Collection Date: 8/16/05
Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		**SW8082**		**(N5503)**		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1221	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1232	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1242	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1248	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1254	ND	0.30		µg/wipe	1	8/18/05
Aroclor 1260	ND	0.30		µg/wipe	1	8/18/05

Approved By: _____ **Date:** _____

Qualifiers:

*	Low Level	**	Value exceeds Maximum Contaminant Value
B	Analyte detected in the associated Method Blank	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	S	Spike Recovery outside accepted recovery limits

APPENDIX C
Manifests

Clean Harbors Environmental Services, Inc.
1302 West 38th Street
Ashtabula, OH 44004
440.992.8665
www.cleanharbors.com

RECEIVED AUG 31 2005

August 26, 2005

JARVIS WILLIAMS
GENESSEE COMMONS ASSOCIATES
345 MT. HOPE AVE
ROCHESTER, NY 14620

RE: HAZARDOUS WASTE MANIFEST #81005

Attached is your copy of the hazardous waste manifest for waste recently removed from your facility.

If you have additional questions please call me at (440) 992-8665.

Sincerely,

Kevin T. Gozzard

Kevin T. Gozzard
Operations Manager

Attachment

cc: Job File #3549

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

NYG 5440023

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. [illegible]

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. [illegible]	Manifest Document No. [illegible]
3. Generator's Name and Mailing Address [illegible]		A. State Manifest Document Number NYG 5440023
4. Generator's Telephone Number [illegible]		B. [illegible]
5. Transporter 1 (Company Name) Clean Harbors [illegible] Services	6. US EPA ID Number [illegible]	C. State Transporter's ID [illegible]
7. Transporter 2 (Company Name)	8. US EPA ID Number	D. Transporter's Phone [illegible]
		E. State Transporter's ID
		F. Transporter's Phone
9. Designated Facility Name and Site Address [illegible]	10. US EPA ID Number [illegible]	G. State Facility ID
		H. Facility's Telephone [illegible]

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible] Biphenyls, [illegible], 9, UN2315, [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	EPA [illegible]
b. [illegible] Biphenyls, [illegible], 9, UN2315, [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	EPA [illegible]
c. [illegible] Biphenyls, [illegible], 9, UN2315, [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	EPA / STATE [illegible]
d.					EPA

J. Additional Descriptions for Materials Listed Above
a. PCB Oil [illegible] Drums
b. [illegible]
c. PCB Debris [illegible]

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
[illegible] Emergency Response [illegible]-3718-[illegible]

[illegible] Placard [illegible]

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[illegible]			

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[illegible]			

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

19. Discrepancy Indication Space
[illegible handwriting]

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[illegible]			

COPY 5—Generator—Mailed by TSD Facility

PCB MANIFEST
CONTINUATION SHEET

COMPANY NAME: Genesee Commons
MANIFEST DOCUMENT #: 8705
PAGE: _____ OF _____
DATE: 8-1-05

UNIT TYPE	MATERIAL TYPE	GENERATOR ID NUMBER	ISSUE	EARLIEST DATE REMOVED FROM SERV. FOR DISPOSAL	PCB LEVEL	INPUT LINE #	QTY IN LBS	UNIT FULL OR EMPTY	GR. BOOK WEIGHT
CM	Trans	JAV 2	1501	8-1-05	7500	B	1258	MT	4024
DM	Oil	1				A			367
↓	↓	2				A			367
		3				A			367
		4				A	↓		367
↓	↓	5				A	1043		406
CF	Debris	10		↓	↓	C	757		716

I CERTIFY THAT WITH THE EXCEPTION OF WEIGHTS, THE ABOVE INFORMATION IS TRUE AND ACCURATE

DISTRIBUTION - WHITE & YELLOW SAFETY-KLEEN; PINK GENERATOR

NYG 5440023

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/23/03)

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NYP000959072
Manifest Doc. No.: [illegible]
2. Page 1 of 1
Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: Genesee Commons Associates, 745 Mt. Hope Ave, Rochester, NY 14620
4. Generator's Telephone Number ( ) 585-326-0312

A. NYG 5440023
B. Generator's ID

5. Transporter 1 (Company Name): Clean Harbors Env. Services
6. US EPA ID Number: MAD039322250
C. State Transporter's ID: [illegible]
D. Transporter's Telephone ( ) 800-993-9762

7. Transporter 2 (Company Name)
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address: Clean Harbors (PPM)LLC., 1302 W 38th St, Ashtabula, OH 44004
10. US EPA ID Number: OHD981093420
G. State Facility ID
H. Facility Telephone ( ) 440-992-0665

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PGII	005	DM	[illegible]	K	EPA / STATE B003
b. RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PGII	001	CM	01250	K	EPA / STATE B006
c. RQ, Polychlorinated Biphenyls, Solid, 9, UN2315, PGII	001	CF	[illegible]	K	EPA / STATE B007
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a. EST 2000ppm PCB Oil in Drums
b. PCB Transformer (Drained)
c. PCB Debris in cubic yard box
d.

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
24Hr Emergency Response 800-483-3718 ERG#171

JOB# SY1005875 Fleet# 7651170F

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible handwriting] | Signature: [signature] | Mo. Day Year: [illegible]

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible handwriting] | Signature: [signature] | Mo. Day Year: [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Mo. Day Year

NYG 5440023

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/22/03)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NYP000959072 | Manifest Doc. No. 61005 | 2. Page 1 of 1 | Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
Genesee County Associates
345 Mt. Hope Ave
Rochester, NY 14620

A. NYG 5440023

B. Generator's ID

4. Generator's Telephone Number (585-324-0512

5. Transporter 1 (Company Name) Clean Harbors Env. Services | 6. US EPA ID Number MAD039322250 | C. State Transporter's ID 8806 | D. Transporter's Telephone (800-995-9762

7. Transporter 2 (Company Name) | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
Clean Harbors (FWH)LLC.
1302 W 38th St.
Ashtabula, OH 44004

10. US EPA ID Number OHD981093420 | G. State Facility ID | H. Facility Telephone (440-992-8665

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII	001	DM	00400	P	EPA STATE 8003
b. RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII	001	DM	00055	P	EPA STATE 8006
c. RQ, Polychlorinated Biphenyls, Solid, 9, UN2315, PGIII	001	DF	00015	P	EPA STATE 8007
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. RQ 2000ppm PCB Oil in Drums
b. PCB Transformer (Drained)
c. PCB Debris in cubic yard box
d.

K. Handling Codes for Wastes Listed Above
a. | b. | c. | d.

15. Special Handling Instructions and Additional Information
24hr emergency response 800-483-3718 RNG#171

JOB# SV1005875 Fleet# 76511707

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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GENERATOR

Printed/Typed Name	Signature	Mo.	Day	Year
Kenneth Williams		10	16	01

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
Rebecca Durant		10	31	01

TRANSPORTER

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

NYG 5440023

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/23/03)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible]
Manifest Doc. No.
2. Page 1 of
Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
[illegible] Associates
345 [illegible] Ave
[illegible], [illegible]

4. Generator's Telephone Number (585-326-0512

5. Transporter 1 (Company Name) Clean Harbors Env. Services
6. US EPA ID Number [illegible]

7. Transporter 2 (Company Name)
8. US EPA ID Number

9. Designated Facility Name and Site Address
Clean Harbors (PPM)LLC,
[illegible] St,
Ashtabula,OH 44004

10. US EPA ID Number [illegible]

A. NYG 5440023
B. Generator's ID
C. State Transporter's ID [illegible]
D. Transporter's Telephone ([illegible]
E. State Transporter's ID
F. Transporter's Telephone ( )
G. State Facility ID
H. Facility Telephone ([illegible]

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ,Polychlorinated Biphenyls,Liquid,9,UN2315, [illegible]		[illegible]		K	EPA / STATE B005
b. RQ,Polychlorinated Biphenyls,Liquid,9,UN2315, [illegible]		[illegible]		K	EPA / STATE B006
c. RQ,Polychlorinated Biphenyls,Solid,9,UN2315, [illegible]		CM		K	EPA / STATE B007
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a. PCB Oil in Drums
b. PCB Transformer (Drained)
c. PCB Debris in [illegible] yard box
d.

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information [illegible]-3720 [illegible]

JOB [illegible]   Plant# [illegible]

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name | Signature | Mo. Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Mo. Day Year

GENERATOR
TRANSPORTER
FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

NYG 5440617

Please type or print. Do not staple

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/23/03)

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NYP000959072
Manifest Doc't No.: 59072
2. Page 1 of 1

Information within heavy bold line is not required by Federal Law.

A. NYG 5440617
B. Generator's ID

3. Generator's Name and Mailing Address:
[illegible]
[illegible]
[illegible], NY 14620

4. Generator's Telephone Number ( ) 585-324-0512

5. Transporter 1 (Company Name): [illegible]
6. US EPA ID Number: [illegible]

C. State Transporter's ID: 4180 [illegible]
D. Transporter's Telephone ( ) 716-[illegible]

7. Transporter 2 (Company Name):
8. US EPA ID Number:

E. State Transporter's ID
F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address:
[illegible]
[illegible]
[illegible]

10. US EPA ID Number: [illegible]

G. State Facility ID
H. Facility Telephone ( ) 800-[illegible]

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Polychlorinated Biphenyls, Solid, 9, UN2315, PGIII	001	CM	Est: 01500	K	EPA STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. PCB Debris/soil
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
24hr emergency response 1-800-483-3718 [illegible] JOB [illegible]
Date removed from service for disposal 8/1/05

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
[illegible]	[signature]			

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
George A[illegible]	[signature]	08	01	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

NYG 5440617

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

Hazardous Waste Manifest 1/23/03

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NYP000959072
Manifest Doc. No.: 59072
2. Page 1 of: 1
Information within heavy bold line is not required by Federal Law.

A. NYG 5440617

3. Generator's Name and Mailing Address
Genesee Gannett Associates
385 Mt. Hope Ave
Rochester, NY 14620

B. Generator's ID

4. Generator's Telephone Number ( ) 585-324-0512

5. Transporter 1 (Company Name): Chandler Price Trucking
6. US EPA ID Number: NYD046765574
C. State Transporter's ID: 4180414, 114
D. Transporter's Telephone ( ) 716-822-1414

7. Transporter 2 (Company Name)
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
Clean Harbors Env., Inc.
1672 E Highland Rd
Twinsburg, OH 44087
10. US EPA ID Number: OHD000867399
G. State Facility ID
H. Facility Telephone ( ) 800-333-9782

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, Polychlorinated Biphenyls, Solid, 9, UN2315, PGIII	001	CM	Est: 07500	K	EPA STATE B007
b.						EPA STATE
c.						EPA STATE
d.						EPA STATE

J. Additional Descriptions for Materials listed Above
a. PCB Debris/soil
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
24hr emergency response: 1-800-483-3718 ERG171 JOB# 8X1005873
Date removal from service for disposal: 8/1/05

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name	Signature	Mo.	Day	Year
[illegible] Williams	[signature]	8	1	05

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
George Arnett	[signature]	08	01	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

GENERATOR

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

NYG 5440617

Please type or print. Do not staple

(Hazardous Waste Manifest 1/23/03)

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST

GENERATOR

1. Generator's US EPA ID No. [illegible]
Manifest Doc. No.
2. Page 1 of
Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address [illegible]
4. Generator's Telephone Number ( ) [illegible]

A. NYG 5440617
B. Generator's ID

5. Transporter 1 (Company Name) [illegible]
6. US EPA ID Number [illegible]
C. State Transporter's ID
D. Transporter's Telephone ( ) [illegible]

7. Transporter 2 (Company Name)
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address [illegible]
10. US EPA ID Number [illegible]
G. State Facility ID
H. Facility Telephone ( ) [illegible]

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible]		[illegible]		[illegible]	EPA STATE [illegible]
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. PCB Debris/soil
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. ☐ c. ☐
b. ☐ d. ☐

15. Special Handling Instructions and Additional Information [illegible]

Date removed from service for disposal 08-01-05

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name	Signature	Mo.	Day	Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

NYSDEC SPILL REPORT FORM

DEC REGION:	8	**SPILL NUMBER:**	0550701
SPILL NAME:	345 MT HOPE AVENUE	**DEC LEAD:**	CAHETTEN

SPILL LOCATION

SPILL DATE:	7/25/2005	**SPILL TIME:**	00:00:00
ALL RECEIVED DATE:	7/25/2005	**RECEIVED TIME:**	00:00:00
PLACE:	345 MT HOPE AVENUE	**COUNTY:**	Monroe
STREET:	345 MT HOPE AVENUE	**TOWN/CITY:**	ROCHESTER
		COMMUNITY:	ROCHESTER
CONTACT:	MAGGI MEDINA	**CONTACT PHONE:**	
SPILL CAUSE:	Equipment Failure	**SPILL REPORTED BY:**	Other
SPILL SOURCE:	Commercial/Industrial	**WATERBODY:**	

CALLER REMARKS:

A 200 GALLON CAPACITY TRANSFORMER WITH PCB OIL GREATER THAN 500 PPM WAS FOUND TO BE LEAKING. THE EXACT QUANTITY IS UNKNOWN, BUT IS NOT A LARGE AMOUNT. THE TRANSFORMER IS LOCATED IN A CONCRETE VAULT UNDER AN OUTDOOR STAIRCASE. THE CONCRETE CURB OF THE VAULT IS STAINED AND SOME OIL HAS IMPACTED THE SOIL OUTSIDE THE VAULT. THE DOORS TO THE VAULT HAVE BEEN VANDALIZED. FAXED TO MCHD ON 07/29/05 AT 0957 HRS.

MATERIAL	CLASS	SPILLED	RECOVERED	RESOURCES AFFECTED
PCB OIL	Petroleum	0.00000G	0.00000G	GW, SOIL, AIR, Ind AIR, SW, DW, Imp SURF, SUBWAY, UTILITY, SEWER,

POTENTIAL SPILLERS

COMPANY	ADDRESS		CONTACT
GENESEE GATEWAY HOUSES C/O CONIFER REALTY INC. LLC	183 EAST MAIN STREET	ROCHESTER NY	MAGGI MEDINA

Tank Number	Tank Size	Test Method	Leak Rate	Gross Failure

DEC REMARKS:

DAY HAS CONTACTED O'CONNELL ELECTRIC, WHO IS ASSESSING THE SITUATION. CH ADVISES DANZINGER THE FREE OIL MUST BE CLEANED UP TONIGHT. THE SITE IS A BROWNFIELD PROJECT BEING OVERSEEN BY KELLY CLOYD OF HWR. THE SITE IS 225-405 MT HOPE AVENUE. DANZINGER NOTIFIED THE NRC BECAUSE THE QUANTITY WAS MORE THAN 1

LB. THE NRC REPORT # IS 766738, WHICH THE DEPARTMENT HAS BEEN FAXED A COPY OF. THE BUILDING WHERE THE TRANSFORMER IS LOCATED IS A 3 STORY APARTMENT COMPLEX WITH CURRENT RESIDENTS. THE AREA HAS BEEN SECURED TO PREVENT ANY HUMAN CONTACT. COPY OF SPILL FAXED TO MCHD AT APPROXIMATELY 1645 HRS.

07/27/05: CH RECEIVES CALL FROM CHRISTIE SUNDERRAJAN OF DAY. CLEAN HARBORS HAS BEEN HIRED TO PERFORM THE CLEANUP AT THE SITE. THE TRANSFORMER HAS BEEN REMOVED FROM SERVICE. CLEAN HARBOR TO BE ON SITE ON 7/28/05 TO PUMP THE REMAINING OIL FROM THE TRANSFORMER AND THEN BEGIN CLEANUP OF THE SOIL AND THE TRANSFORMER PAD. SAMPLING OF THE PAD AND SOILS WILL BE TAKEN.

MARCOR HAS BEEN HIRED TO PERFORM CLEANUP OF THE FREE LIQUID TONIGHT. THE STAIRCASE ABOVE THE TRANSFORMER HAS BEEN TAKEN OUT-OF-SERVICE. REFERRED TO HAZARDOUS WASTE SECTION FOR FOLLOW UP. NO FURTHER ACTION IS NEEDED BY SPILLS.

08/01/05: CHRISTIE SUNDERRAJAN CALLS DEPT TO REPORT THE TRANSFORMER HAS BEEN REMOVED AND SAMPLE RESULTS HAVE BEEN REVIEWED. THEY WILL PERFORM ADDITIONAL SOIL REMOVAL BASED ON THE TWO SOIL SAMPLE RESULTS OF 16 AND 4.6 PPM IN THE SOILS JUST OUTSIDE THE PAD. BELIEVE RESULTS MAY HAVE BEEN ELEVATED DUE TO THE INABILITY TO REMOVE ALL SOILS DUE TO CONCRETE POURED OVER SUB-SURFACE ELECTRIC LINE. ADDITIONAL SOILS WILL BE REMOVED BY HAND. WIPE SAMPLES OF THE PAD WERE ALL NON-DETECT. THREE CORE SAMPLES OF THE PAD TAKEN AT A DEPTH OF ONE INCH. TWO OF THE CORES WERE NON-DETECT. THE 3RD HAD A RESULT OF 11 PPM. THEY WOULD LIKE TO LEAVE THE PAD IN PLACE UNTIL THE PROPERTY IS DEMOLISHED SOMETIME WITHIN THE NEXT YEAR WITH TWO YEARS BEING A MAXIMUM. THE PAD IS INSIDE A SECURE GATED VAULT OUT OF PUBLIC CONTACT. CH WILL PASS REQUEST ON TO THE MONROE COUNTY HEALTH DEPT FOR THEIR INPUT.

8/4/05: JOE ALBERT OF MCHD MET ON SITE WITH SUNDERRAJAN OF DAY. THE TRANSFORMER PAD WAS SATISFACTORILY CLEANED AND JOE APPROVES THE INSTALLATION OF THE NEW TRANSFORMER. ALBERT DID FIND SIGNIFICANTLY STAINED SOIL OUTSIDE THE VAULT WITH THE STAINING ALSO ON THE ADJACENT CONCRETE CURB. THE IMPACTED SOIL WAS COVERED WITH A TARP UNTIL SOIL REMOVAL COULD BE PERFORMED. THE SOIL WAS IMPACTED BY THE TRANSFORMER OIL RUNNING OUT A DRAIN IN THE VAULT TO THE OUTSIDE. THE DEPT WAS NOT NOTIFIED OF THIS DRAIN. ALBERT ALSO REPORTS THAT IN THE TRANSFER OF THE OIL FROM THE TRANSFORMER, OIL WAS SPILLED TO THE PARKING LOT. THIS BLACKTOP WAS REMOVED AND CONFIRMATORY SAMPLES OF THE UNDERLYING SOILS TAKEN WITH NON DETECT RESULTS. THE DEPT WAS NOT NOTIFIED OF THIS ACTION.

08/5/05: ALBERT NOTIFIES DEPT THAT SUNDERRAJAN NOTIFIED HIM THE CLEANUP CONTRACTOR COVERED THE STAINED SOIL WITH 6 MIL POLY AND PLACED CLEAN SOIL OVER THE POLY. THE FINAL CLEANUP WILL TAKE PLACE DURING THE WEEK OF AUG.8TH.

12/12/05: WASTE TO BE DISPOSED OF. FINAL DISPOSITION OF CONCRETE PAD WILL TAKE PLACE IN 2006 WHEN BLDG DEMO TAKES PLACE. FOLLOW UP WILL BE DONE BY KELLY CLOYD UNDER THE VCP.

03/05/08 PAPER FILE REMOVED PER FILE RETENTION POLICY.

PIN	**T&A**			**COST CENTER**	
CLASS:	B3 **CLOSE DATE**	7/27/2005 12:00:00 AM		**MEETS STANDARDS**	True

Attachment B

Transformer Spill Cleanup Report/Spill Closure Report
(225 Mt. Hope Avenue)

day
DAY ENVIRONMENTAL, INC.

ENVIRONMENTAL CONSULTANTS
AN AFFILIATE OF DAY ENGINEERING, P.C.

October 28, 2005

Regional Administrator – Kathleen Callahan
U.S. Environmental Protection Agency – Region 2
290 Broadway
New York, New York 10007-1866

FILE COPY

Dr. Kelly Cloyd
Project Manager
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-9516

Mr. Joseph Albert
Senior Public Health Sanitarian
Monroe County Department of Health
111 Westfall Road
Rochester, New York 14620

RE: PCB Transformer Spill (NRC Spill # 772740; NYSDEC Spill # 0551001)
225 Mount Hope Avenue, Rochester, New York

On September 16, 2005, a PCB Transformer was reported leaking PCB fluid at 225 Mount Hope Avenue, Rochester, New York (refer to Figure 1 included as Appendix A). The fluid was identified as having a PCB concentration of 20,400-milligrams/kilograms (mg/kg). The release was caused by failure of a transformer bushing where the bushing connected through the transformer on the primary (i.e., high voltage) side.

The transformer nameplate indicates it has a capacity of 266 gallons. Approximately 207 gallons of PCB fluid was collected in drums prior to removal and off-site disposal of the transformer. The transformer was installed in the early 1970's and there are no records of known activity or topping off of the transformer oil. As such, it is unknown if the transformer contained full capacity at the time of the spill. Based on the above considerations, it is assumed that approximately 59 gallons of oil was released to the transformer vault and the environment.

Response / Cleanup

PCB fluids were released to the vault containment area surrounding the PCB Transformer, the curbing of the transformer vault, and to soil to the north of the vault. No PCB fluids reached water or storm water drains. No injuries occurred as a result of this spill. Clean Harbors Environmental Services, Inc. completed the following clean-up actions with assistance from Billitier Electric, Inc.:

- The transformer was shut down. Some fluid was removed from the transformer prior to removal from the vault. The transformer was completely drained and transported off-site for disposal. Transformer fluids were placed in drums and subsequently transported off-site for disposal.

40 COMMERCIAL STREET
ROCHESTER, NEW YORK 14614-1008
(585) 454-0210
FAX (585) 454-0825

www.dayenvironmental.com

60 EAST 42nd STREET, SUITE 1641
NEW YORK, NEW YORK 10165-1617
(212) 986-8645
FAX (212) 986-8657

- Spilled PCB fluids and PCB-contaminated debris were removed from the vault. The concrete flooring, concrete curbing to the vault, and the concrete surface immediately exterior to the vault was cleaned with solvent.
- Soil impacted by PCB fluids was removed to a depth of approximately 12-inches. No sign of PCB contamination was observed at this depth.

Sampling and Analytical Results

The Site Sketch (Figure 1 in Appendix A) shows the approximate areas impacted by the PCB fluid release. Figure 1 also indicates the approximate locations of confirmatory wipe samples and soil samples collected as part of the clean up. PCB sample results are also indicated on the Site Sketch. Analytical laboratory test results and executed chain-of-custody documentation for the confirmatory samples are enclosed in Appendix B.

Following is a summary of the confirmatory samples that were collected from the clean-up areas associated with the spill, and analyzed for PCBs using Method SW8082. The summary also includes a discussion of the analytical laboratory test results:

- Wipe samples V1 through V5 were collected from the concrete pad within the transformer vault area. With the exception of wipe sample V2, the PCB contaminated concrete surface within the transformer vault was remediated to "non-detect" levels. Wipe sample V2, at the northeast corner of the transformer vault pad, contained a concentration of 0.74-µg/100cm^2 PCBs. Discussions were held with Mr. Carl Hettenbaugh of the New York State Department of Environmental Conservation (NYSDEC) regarding this sample result. It was agreed that the concrete does not require encapsulation and that the new PCB-Free transformer could be placed on the concrete. The new transformer is fenced within the vault, limiting accessibility.
- Wipe samples V6 through V9 were collected from the exterior concrete wall surface located south of the soil removal area and from the curbing and concrete surface exterior to the transformer vault. With the exception of wipe sample V8 located on the northeast portion of the transformer vault curbing, the PCB contaminated surfaces identified were remediated to "non-detect" levels. Wipe sample V8, at the northeast portion of the transformer vault curbing, contained a concentration of 28-µg/100cm^2 PCBs. A discussion was held with Dr. Kelly Cloyd of the NYSDEC regarding this sample result. It was agreed that the curbing could be encapsulated and that this curbing can be managed as PCB-Contaminated material when the building is demolished.
- Soil samples S1 and S3 were collected from the excavation north of the transformer vault subsequent to the removal of impacted soil. Analytical laboratory test results for these soil samples indicated PCB concentrations of 0.35-mg/kg for soil sample S1 and 0.16-mg/kg for soil sample S2. In a discussion with Mr. Carl Hettenbaugh of the NYSDEC, it was agreed that further soil removal is not required since the detected PCB concentrations are less than 1 mg/kg.

Further evaluation of the concrete and the soil under the transformer pad edges will be completed in preparation for building demolition, and the material will be managed as PCB-Contaminated material when the building is demolished. Building demolition is planned for 2006 or 2007.

Disposal

PCB fluids, PCB Debris and the PCB Transformer were shipped from the site on October 10, 2005. Copies of the manifests are attached in Appendix C. Certificates of destruction have not been received at this date. However, a discussion with Clean Harbors has indicated the final disposition of PCB materials generated from the site is as follows:

- Drums of PCB fluids will be sent to a PCB incinerator located in Deer Park, Texas.
- Debris of spill clean-up material and contaminated soil will be sent to the Clean Harbors hazardous waste landfill in Grassy Mountain, Utah.
- The PCB Transformer will be disassembled and solvent washed at the Clean Harbors Ashtabula, Ohio facility and then smelted after complete cleaning. Wash waters created during solvent washing will be sent to the PCB incinerator located in Deer Park, Texas.

If there are any questions, please contact this office; Mr. Allen Handelman, Project Manager associated with Conifer Realty at (585) 324-0512; or Ms. Magdelena Medina, Property Manager at the 225 Mount Hope Avenue location at (585) 546-1240.

Sincerely,

Christie Sunderrajan, E.I.T., CHMM
Sr. Professional

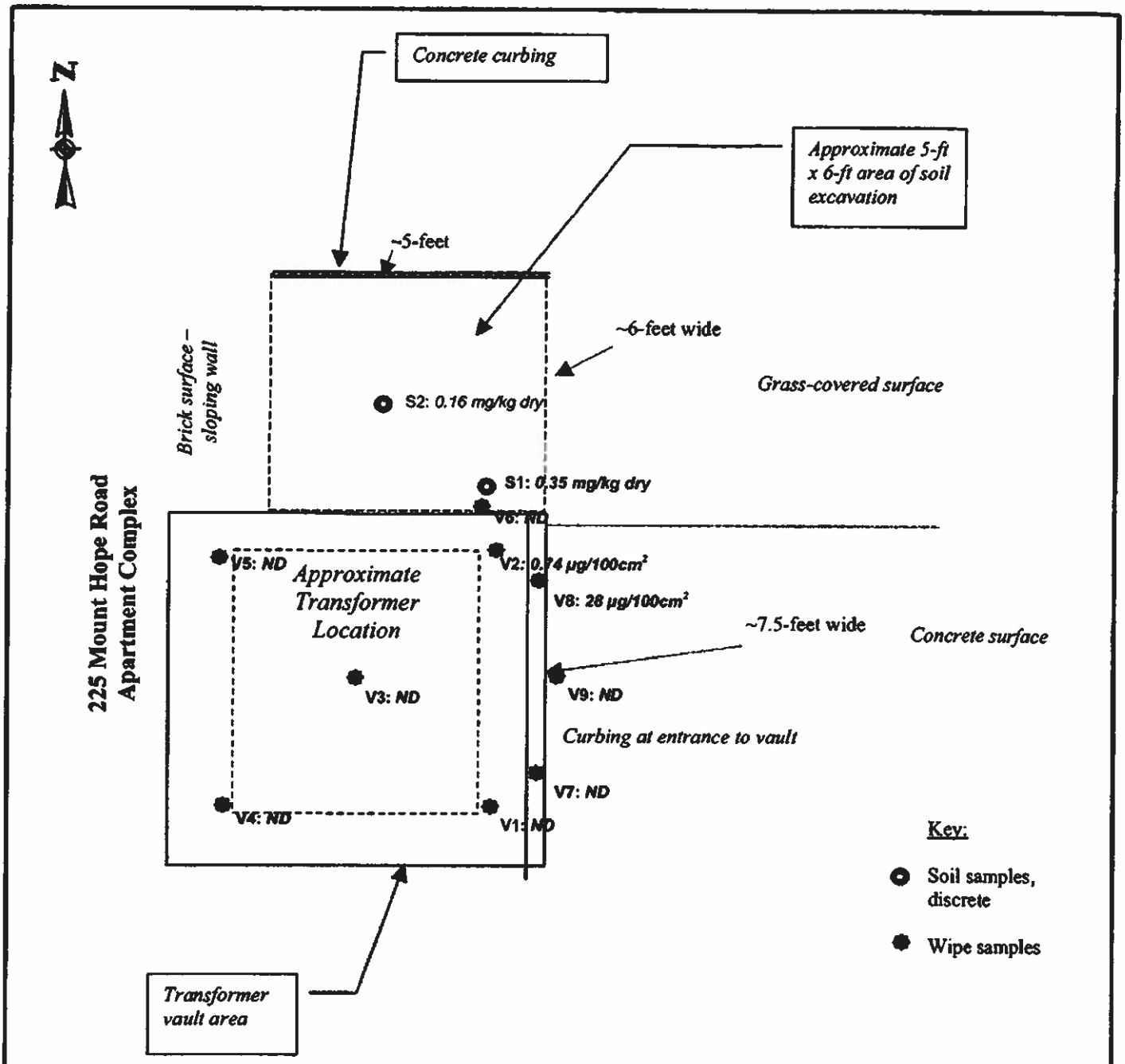
Jeffrey D. Danzinger
Project Manager

Enclosures

cc: Allen Handelman (Conifer Realty) – with enclosures

CS3632 / 3687S-05

APPENDIX A
Site Sketch



Notes:

1) Site sketch based on observations made at the time of the site visit performed by a Day Environmental, Inc. representative and a Clean Harbors Environmental Services, Inc representative in October 2005.
2) The sketched area is only a representation of the affected area, and does not depict the actual property boundaries of the site.

DATE 8/25/05 DRAWN BY CMS SCALE Not to Scale	day DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14614	PROJECT TITLE PCB Transformer Spill Location 225 Mount Hope Avenue Rochester, New York PCB Spill Response DRAWING TITLE SITE SKETCH	PROJECT NO. 3687S-05 FIGURE 1

APPENDIX B
Analytical Results

Upstate Laboratories, Inc.

Shipping: 6034 Corporate Dr. * E. Syracuse, NY 13057-1017 * (315) 437-0255 * Fax (315) 437-1209
Mailing: Box 169 * Syracuse, NY 13206
Albany (518) 459-3134 * Binghamton (607) 724-0478 * Buffalo (716) 649-2533
Rochester (585) 436-9070 * New Jersey (201) 343-5353 * South Carolina (864) 878-3280

To: Bob Reed - Billitier Electric
(585) - 224 - 1110

Mr. Anthony Napoli
Clean Harbors Env. Svcs., Inc.
14 Corporate Circle
E. Syracuse, NY 13057

Friday, October 07, 2005

RE: River Park Commons/Billitier Electric

Order No.: U0510070

Dear Mr. Anthony Napoli:

Upstate Laboratories, Inc. received 4 sample(s) on 10/6/05 for the analyses presented in the following report.

All analytical data conforms with standard approved methodologies and quality control. Our quality control narrative will be included should any anomalies occur.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your samples. Samples will be disposed of approximately one month from final report date.

Should you have any questions regarding these tests, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

AJS (PFF)
Anthony J. Scala
President/CEO

Upstate Laboratories, Inc.

Date: 07-Oct-05

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: River Park Commons/Billiter Electric

Lab Order: U0510070

Lab ID: U0510070-001 **Collection Date:** 10/5/05 2:30:00 PM
Client Sample ID: V6 Right Outer Wall **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/6/05

Lab ID: U0510070-002 **Collection Date:** 10/5/05 2:35:00 PM
Client Sample ID: V7 Left Side of Curb **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/6/05

Lab ID: U0510070-003 **Collection Date:** 10/5/05 2:40:00 PM
Client Sample ID: V8 Right Side of Curb **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	28	0.30		µg/wipe	1	10/6/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/6/05

Approved By: PFF Date: 10-7-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *07-Oct-05*

CLIENT: Clean Harbors Env. Svcs., Inc. Lab Order: U0510070
Project: River Park Commons/Billiter Electric

Lab ID: U0510070-004 Collection Date: 10/5/05 2:45:00 PM
Client Sample ID: V9 3' Out From Curb Middle Matrix: WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		**SW8082**		**(N5503)**		**Analyst: LD**
Aroclor 1016	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/6/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/6/05

Approved By: PFF Date: 10-7-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- R Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

6034 Corporate Drive • E. Syracuse, NY 13057-1017
(315) 437 0255 Fax 437 1209

Chain Of Custody Record

Client	Client Project # / Project Name	Special Turnaround
CLEAN HARBORS	RIVER PARK COMMONS / Brittiger Elec	Time 24 hr. (Lab Notification required)

Client Contact	Phone #	Site Location (city/state)
Tony Napoli	(315) 463-9900	Rochester, NY

Sample Location	Date	Time	Matrix	Grab or Comp.	ULI internal use only WS10070	No. of Containers	1) PCBS	2) PCBS	3) PCBS	4) PCBS	5)	6)	7)	8)	9)	10)	Remarks
V6 Right Outer Wall	10-5-05	1430	PCB Wipe		-001	1											
V7 Left side of curb	10-5-05	1435	PCB Wipe		-002	1											
V8 Right side of curb	10-5-05	1440	PCB Wipe		-003	1											
V9 3 ft out from curb middle	10-5-05	1445	PCB Wipe		-004	1											

parameter and method	sample bottle: type	size	pres.
1)		4 1/2	
2)			
3)			
4)			
5)			
6)			
7)			
8)			
9)			
10)			

Note: The numbered columns above cross-reference with the numbered columns in the upper right-hand corner.

Sampled by: (Please Print) David HARRIS
Company: CLEAN HARBORS

ULI Internal Use Only
Delivery (check one):
☐ ULI Sampled
☐ Pickup ☐ Dropoff
☐ CC ______

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Stephen [signature]	10/6/05	740	Anna Boim (for lab)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Rec'd for Lab by: (Signature)

Upstate Laboratories, Inc.
Shipping: 6034 Corporate Dr. * E. Syracuse, NY 13057-1017 * (315) 437-0255 * Fax (315) 437-1209
Mailing: Box 169 * Syracuse, NY 13206
Albany (518) 459-3134 * Binghamton (607) 724-0478 * Buffalo (716) 649-2533
Rochester (585) 436-9070 * New Jersey (201) 343-5353 * South Carolina (864) 878-3280

ATTENTION: BOB REED
BILLITIER ELECTRIC
585-224-1110

Mr. Anthony Napoli
Clean Harbors Env. Svcs., Inc.
14 Corporate Circle
E. Syracuse, NY 13057

Thursday, October 06, 2005

RE: River Park Commons/Billitier Electric

Order No.: U0510056

Dear Mr. Anthony Napoli:

Upstate Laboratories, Inc. received 7 sample(s) on 10/5/05 for the analyses presented in the following report.

All analytical data conforms with standard approved methodologies and quality control. Our quality control narrative will be included should any anomalies occur.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your samples. Samples will be disposed of approximately one month from final report date.

Should you have any questions regarding these tests, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

AJS (PFF)
Anthony J. Scala
President/CEO

Upstate Laboratories, Inc.

Date: *06-Oct-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: River Park Commons/Billidor Electric

Lab Order: U0510056

Lab ID: U0510056-001 **Collection Date:** 10/4/05 8:05:00 PM
Client Sample ID: Left Front V1 Flr **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/5/05

Lab ID: U0510056-002 **Collection Date:** 10/4/05 8:10:00 PM
Client Sample ID: Right Front V2 Flr **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1260	0.74	0.30		µg/wipe	1	10/5/05

Lab ID: U0510056-003 **Collection Date:** 10/4/05 8:15:00 PM
Client Sample ID: Middle V3 Flr **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/5/05

Approved By: PFF Date: 10-6-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: 06-Oct-05

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: River Park Commons/Billitier Electric
Lab Order: U0510056

Lab ID: U0510056-004 **Collection Date:** 10/4/05 8:20:00 PM
Client Sample ID: Left Rear V4 Flr **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/5/05

Lab ID: U0510056-005 **Collection Date:** 10/4/05 8:25:00 PM
Client Sample ID: Right Rear V5 Flr **Matrix:** WIPE

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS IN WIPES		SW8082		(N5503)		Analyst: LD
Aroclor 1016	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1221	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1232	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1242	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1248	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1254	ND	0.30		µg/wipe	1	10/5/05
Aroclor 1260	ND	0.30		µg/wipe	1	10/5/05

Lab ID: U0510056-006 **Collection Date:** 10/4/05 8:30:00 PM
Client Sample ID: S1 Outside V Right Corner **Matrix:** SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		SW8082		(SW3550B)		Analyst: LD
Aroclor 1016	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1221	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1232	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1242	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1248	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1254	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1260	0.35	0.091		mg/kg-dry	1	10/6/05
PERCENT MOISTURE		D2216				Analyst: CC
Percent Moisture	8.55	0.00100		wt%	1	10/6/05

Approved By: PFF Date: 10-6-05

Qualifiers:
- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *06-Oct-05*

CLIENT: Clean Harbors Env. Svcs., Inc.
Project: River Park Commons/Billitier Electric
Lab Order: U0510056

Lab ID: U0510056-007
Client Sample ID: S2 Off Middle R. Side
Collection Date: 10/4/05 8:33:00 PM
Matrix: SOIL

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATED BIPHENYLS(SOIL/SLUDGE)		**SW8082**		**(SW3550B)**		**Analyst: LD**
Aroclor 1016	ND	0.092		mg/kg-dry	1	10/6/05
Aroclor 1221	ND	0.092		mg/kg-dry	1	10/6/05
Aroclor 1232	ND	0.092		mg/kg-dry	1	10/6/05
Aroclor 1242	ND	0.092		mg/kg-dry	1	10/6/05
Aroclor 1248	ND	0.092		mg/kg-dry	1	10/6/05
Aroclor 1254	ND	0.092		mg/kg-dry	1	10/6/05
Aroclor 1260	0.16	0.092		mg/kg-dry	1	10/6/05
PERCENT MOISTURE		**D2216**				**Analyst: CC**
Percent Moisture	9.75	0.00100		wt%	1	10/6/05

Approved By: PFF
Date: 10-6-05

Qualifiers:
- * Low Level
- H Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

(315) 437 0255 Fax 437 1209

Chain of Custody Record

Client: CLEAN HARBORS
Client Project # / Project Name: River Park Commons / Billitier Elec
Client Contact: Tony Napoli — Phone #: 315 463-9931
Site Location (city/state): Rochester, NY
Sample Location: Transformer V

Special Turnaround Time: 24 hr (Lab Notification required)

Sample Location	Date	Time	Matrix	Grab or Comp.	ULI Internal Use Only	No. of Containers	1) PCBs	2) PCBs	3) PCBs	4) PCBs	5) PCBs	6) PCB	7) PCB	8)	9)	10)	Remarks
Left Front V1 Flr.	10-4-05	2005	PCB Wipe		U0510056 -001	1											
Right Front V2 Flr.	10-4-05	2010	PCB Wipe		-002	1											
Middle V3 Flr.	10-4-05	2015			-003	1											
Left Rear V4 Flr.	10-4-05	2020			-004	1											
Right Rear V5 Flr.	10-4-05	2025			-005	1											
S1 outside V right corner	10-4-05	2030	SOIL		-006	1								X			
S2 3' off middle R side wall	10-4-05	2035	SOIL		-007	1								X			

parameter and method	sample bottle: type	size	pres.
1)			
2)			
3)			
4)			
5)			
6)			
7)			
8)			
9)			
10)			

Note: The numbered columns above cross-reference with the numbered columns in the upper right-hand corner.

Sampled by: (Please Print) DAVID HARRIS
Company: CLEAN HARBORS

ULI Internal Use Only
Delivery (check one):
☐ ULI Sampled
☐ Pickup ☐ Dropoff
☐ CC ______

Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Rec'd for Lab by: (Signature)
David Harris	10/5/05	8:20	M Johnson

Syracuse Rochester Buffalo Albany Binghamton Fair Lawn (NJ)

Upstate Laboratories, Inc.

WORK ORDER Summary

05-Oct-05

Client ID: CLEAN HARBORS
Project: River Park Commons/Billinier Elec
QC Level:
Comments:

Work Order U0510056

Sample ID	Client Sample ID	Collection Date	Date Received	Date Due	Matrix	Test Code	Hld	MS	SEL	Sub	Storage
U0510056-001A	Left Front V1 Flr	10/4/05 8:05:00 PM	10/5/05	10/6/05	Wipe	8082_WIPE	☐	☐	☐	☐	Main Cooler
				10/6/05		N5503_WIPE	☐	☐	☐	☐	Main Cooler
U0510056-002A	Right Front V2 Flr	10/4/05 8:10:00 PM		10/6/05		8082_WIPE	☐	☐	☐	☐	Main Cooler
				10/6/05		N5503_WIPE	☐	☐	☐	☐	Main Cooler
U0510056-003A	Middle V3 Flr	10/4/05 8:15:00 PM		10/6/05		8082_WIPE	☐	☐	☐	☐	Main Cooler
				10/6/05		N5503_WIPE	☐	☐	☐	☐	Main Cooler
U0510056-004A	Left Rear V4 Flr	10/4/05 8:20:00 PM		10/6/05		8082_WIPE	☐	☐	☐	☐	Main Cooler
				10/6/05		N5503_WIPE	☐	☐	☐	☐	Main Cooler
U0510056-005A	Right Rear V5 Flr	10/4/05 8:25:00 PM		10/6/05		8082_WIPE	☐	☐	☐	☐	Main Cooler
				10/6/05		N5503_WIPE	☐	☐	☐	☐	Main Cooler
U0510056-006A	S1 Outside V Right Corner	10/4/05 8:30:00 PM		10/6/05	Soil	3550_PCB	☐	☐	☐	☐	Main Cooler
				10/6/05		8082_S	☐	☐	☐	☐	Main Cooler
				10/6/05		PMOIST	☐	☐	☐	☐	Main Cooler
U0510056-007A	S2 OB/Middle R. Side	10/4/05 8:35:00 PM		10/6/05		3550_PCB	☐	☐	☐	☐	Main Cooler
				10/6/05		8082_S	☐	☐	☐	☐	Main Cooler
				10/6/05		PMOIST	☐	☐	☐	☐	Main Cooler

APPENDIX C
Manifests

NYG 4450851

DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NYP000959077 — Manifest Doc. No.: 50851 — 2. Page 1 of 2

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: ~~River Park Commons, 185 Mt. Hope Ave HF, Rochester, NY 14620~~ GENESSEE COMMONS ASSOCIATES, 345 MOUNT HOPE AVE., ROCHESTER, NY 14620

A. NYG 4450851

B. Generator's ID

4. Generator's Telephone Number (585) 324-0512

5. Transporter 1 (Company Name): Clean Harbors Env. Services

6. US EPA ID Number: MAD039322250

C. State Transporter's ID MA006

D. Transporter's Telephone 800-995-9762

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address: Clean Harbors (PPM) LLC. 1672 E Highland Rd Twinsburg, OH 44087

10. US EPA ID Number: OHD986975399

G. State Facility ID

H. Facility Telephone: 800-995-9762

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Container Number	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a	RQ, POLYCHLORINATED BIPHENYLS, LIQUID, 9, UN2315, PG III	007	DM	01435	K	STATE B005
b	RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN2315, PG III	[illegible]	DM	00318	K	STATE B007
c	RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN2315, PG III	001	CF	01000	K	STATE B007
d	RQ, POLYCHLORINATED BIPHENYLS, LIQUID, 9, UN2315 PG III	001	CM	01443	K	STATE B006

J. Additional Descriptions for Materials Listed Above: (DM) oil [illegible]; (DM) solid debris; (CF) solid dirt; (CM) transformer drained

K. Handling Codes for Wastes Listed Above: a. R; b. I; c. I; d. R

15. Special Handling Instructions and Additional Information: 24hr emergency response# 800-483-3718 ~~ERG#171~~ JOB# SY1044258 Fleet# 7651170T

CR / FS / OFEC ✓

SITE ADDRESS: RIVER PARK COMMONS, 185 MT. HOPE AVE., ROCHESTER, NY 14620

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: STEVEN BAKER — Signature: [signature] — Mo. 1/10 Day 10 Year 05

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: HAROLD W. POTTS, JR — Signature: [signature] — Mo. 10 Day 10 Year 05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Mo. Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: DONALD TREXLER — Signature: [signature] — Mo. 10 Day 13 Year 05

COPY 1—Disposer State—Mailed by TSD Facility

PCB MANIFEST 7533144-7533156
CONTINUATION SHEET

COMPANY NAME River Park Commons

MANIFEST DOCUMENT # NYC-4450851

PAGE 2 OF 2

DATE 10-10-05

	UNIT TYPE	MATERIAL TYPE	GENERATOR UNIQUE ID NUMBER	EARLIEST DATE REMOVED FROM SER. FOR DISPOSAL	PCB LEVEL	MFST LINE #	WGT IN KG	UNIT FULL OR EMPTY	SK DOCK WEIGHT
3003 1	DM	LIQUID/BULK OIL	1001	10-05-05	≥50	11a	265	FULL	
2			1002				265		
3			1003				265		
4			1004				265		
5			1005				265		
6			1006				265		
7	DM	LIQUID/OIL	1007				205		
3007 8	DM	SOLID/DEBRIS	1008			11b	150		
9			1009				150		
10			1010				150		
3007 11	CF	DIRT/SOIL SOLID	1011			11c.	1000		
3006 12	CM	LIQUID TRANSFORMER	1012			11d.	1143	EMPTY	
3007 13	DM	SOLID/DEBRIS	1013			11b	68	FULL	

7-OIL
4-SOLID DEBRIS
1 - CU. BOX
1 × TRFR

I CERTIFY THAT WITH THE EXCEPTION OF WEIGHTS, THE ABOVE INFORMATION IS TRUE AND ACCURATE

Steven Baker
GENERATOR SIGNATURE

DISTRIBUTION - WHITE & YELLOW SAFETY-KLEEN, PINK GENERATOR

NYSDEC SPILL REPORT FORM

DEC REGION:	8	**SPILL NUMBER:**	0551001
SPILL NAME:	RIVERPARK COMMONS	**DEC LEAD:**	MFZAMIAR

SPILL LOCATION

SPILL DATE:	9/16/2005	**SPILL TIME:**	00:00:00
ALL RECEIVED DATE:	9/16/2005	**RECEIVED TIME:**	00:00:00
PLACE:	RIVERPARK COMMONS	**COUNTY:**	Monroe
STREET:	225 MT HOPE AVENUE	**TOWN/CITY:**	ROCHESTER
		COMMUNITY:	ROCHESTER
CONTACT:	MAGGIE MEDINA	**CONTACT PHONE:**	
SPILL CAUSE:	Equipment Failure	**SPILL REPORTED BY:**	Other
SPILL SOURCE:	Private Dwelling	**WATERBODY:**	

CALLER REMARKS:

A LEAKING BUSHING WAS NOTED ON A TRANSFORMER AT THIS APARTMENT COMPLEX. VOLUME SPILLED IS UNKNOWN, BUT THE LEAK IS A SLOW LEAK, AND THE MATERIAL IS BEING RELEASED TO A CONCRETE PAD BELOW THE TRANSFORMER. O'CONNELL ELECTRIC IS RESPONDING TO REPLACE THE TRANSFORMER. THE CLEANUP WILL BE COMPLETED WHEN THE TRANSFORMER IS REMOVED AND IT IS SAFE TO ACCESSS THE AREA. FAXED TO MCHD ON 09/29/05 AT 1244 HRS.

MATERIAL	CLASS	SPILLED	RECOVERED	RESOURCES AFFECTED
PCB OIL	Petroleum	0.00000G	0.00000G	GW, SOIL, AIR, Ind AIR, SW, DW, Imp SURF, SUBWAY, UTILITY, SEWER,

POTENTIAL SPILLERS

COMPANY	ADDRESS		CONTACT
GENESEE GATEWAY HOUSES INC C/O CONIFER REALTORS LLC	183 EAST MAIN STREET	ROCHESTER NY	ALLAN HANDELMAN

Tank Number	Tank Size	Test Method	Leak Rate	Gross Failure

DEC REMARKS:

9/16/2005 CALLER ALSO NOTIFIED THE NATIONAL RESPONSE CENTER (NRC INCIDENT # 772740)

10/13/05: CH RECEIVES SEVERAL PHONE MESSAGES FROM CHRISTIE SUNDERAGEN OF DAY

REGARDING WIPE SAMPLES OF THE TRANSFORMER PAD. THE ONES BENEATH THE TRANSFORMER WERE NON DETECT, BUT SHE CALLS BACK AND REPORTS THAT ONE WIPE SAMPLE FROM THE EDGE OF THE PAD WAS 28 MG/M2. SHE REQUEST PERMISSION TO SEAL THIS AREA UNTIL NEXT YEAR WHEN THE SITE WILL BE DEMOLISHED. THIS WILL BE ACCEPTABLE TO THE DEPT IF THE PAD IS THE ONLY IMPACTED AREA. IF SOILS ARE IMPACTED THEY MUST BE ADDRESSED. THIS SPILL WILL BE FORWARDED TO KELLY CLOYD OF HWR TO HANDLE UNDER THE VCA IN PLACE FOR THE SITE. NO FURTHER ACTION IS NECESSARY BY SPILLS.

PIN		**T&A**		**COST CENTER**	
CLASS:	C3	**CLOSE DATE**	10/13/2005 12:00:00 AM	**MEETS STANDARDS**	False

Attachment C

Supplemental Health and Safety Protocols for PCB Remediation Work

Supplemental Health and Safety Protocols
for PCB Remediation Work
NYSDEC Site #C828125
225-405 Mount Hope Avenue
Rochester, New York

This document is a supplement to the August 2004 Health and Safety Plan (HASP) that was prepared for this project. The prototols outlined herein and in the August 2004 HASP can be used during implementation of the remediation activities covered by this IRM Work Plan.

Site-specific activities covered by these supplemental health and safety protocols include:

- Removal of two existing PCB transformers; and
- Remediation of PCB wastes.

Site activities during PCB transformer removal and PCB waste remediation may include, but may not necessarily be limited to the following: PCB oil removal and transfer to disposal container(s); removal and handling of PCB wastes, such as concrete building materials (e.g., transformer pad, sidewalk vault curbing, etc.) and soils.

Chemical Hazards

Chemical substances can enter the unprotected body by inhalation, skin absorption, ingestion, or through a puncture wound (injection). A contaminant can cause damage to the point of contact or can act systemically, causing a toxic effect at a part of the body distant from the point of initial contact.

The most likely routes of exposure for the activities that are performed during removal of PCB transformer and PCB wastes include inhalation and absorption through skin/eye contact. Another potential route of exposure for PCBs includes ingestion.

The primary constituent of concern during PCB transformer and PCB wastes is PCBs that are present in the transformer dielectric fluid, and to a lesser degree the PCBs wastes such as contaminated concrete transform pad, concrete curing, or soils. If PCBs are burned, the respirable soot contains PCBs, polychlorinated dibenzofurans, and chlorinated dibenzo-p-dioxins. For PCBs, the OSHA permissible exposure limit (PEL) is 1 mg/m^3, and the level that is considered immediately dangerous to life and health (IDLH) is 5 mg/m^3.

Personal Protective Equipment

Modified Level D must be worn during activities that involve PCBs, which consists of the following:

- Safety glasses with side shields
- Hard hat
- Steel-toed work boots covered with disposable boot covers
- Nitrile gloves*

- Hearing protection, if needed
- Reflective vest if conducting work where vehicular or forklift traffic is located.
- Outer protective wear, such as Tyvek coverall [Tyveks (Sarans) and polyvinyl chloride (PVC) will be required when workers have a potential to be exposed to NAPL or activated carbon particulates].
    * Nitrile gloves are often appropriate when handing oil potentially containing elevated concentrations of PCBs. However, depending on the material encountered, another glove type may be more appropriate.

First Aid

The following 'First Aid' is to occur after contact with free product that has the potential to contain PCBs or airborne mists containing PCBs.

- Skin Contact: Wash with warm water and soap; apply cold cream to reduce irritation
- Eye Contact: Flush with lukewarm water for at least 15 minutes; seek medical attention
- Ingestion: Do not induce vomiting; consult a physician
- Inhalation: Get victim to fresh air; take victim to physician