



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 yault 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

#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/100cm² (ug/100cm²) 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 ≤ 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 ≥ 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 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., ≥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 ≥ 2 centimeters and ≤ 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 <10 ug/100cm² 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.



Figure 1 - Project Locus Map

Figure 2 - Components of Interim Remedial Measure Work Plan

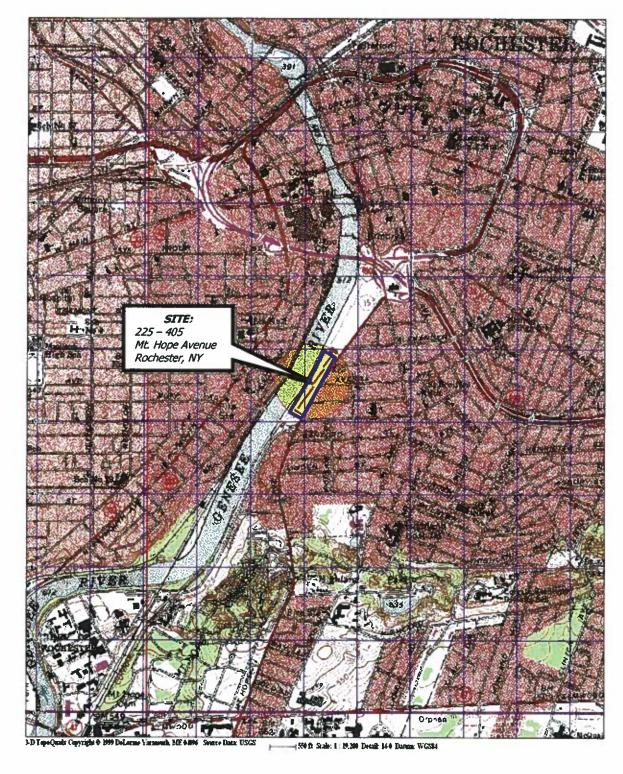
Attachment A - Transformer Spill Cleanup Report/Spill Closure Report (345 Mt. Hope Avenue)

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 ENVIRONMENTAL, INC. **ENVIRONMENTAL CONSULTANTS** ROCHESTER, NEW YORK 14623-2700

PROJECT TITLE

225 - 405 MT. HOPE AVENUE ROCHESTER, NY

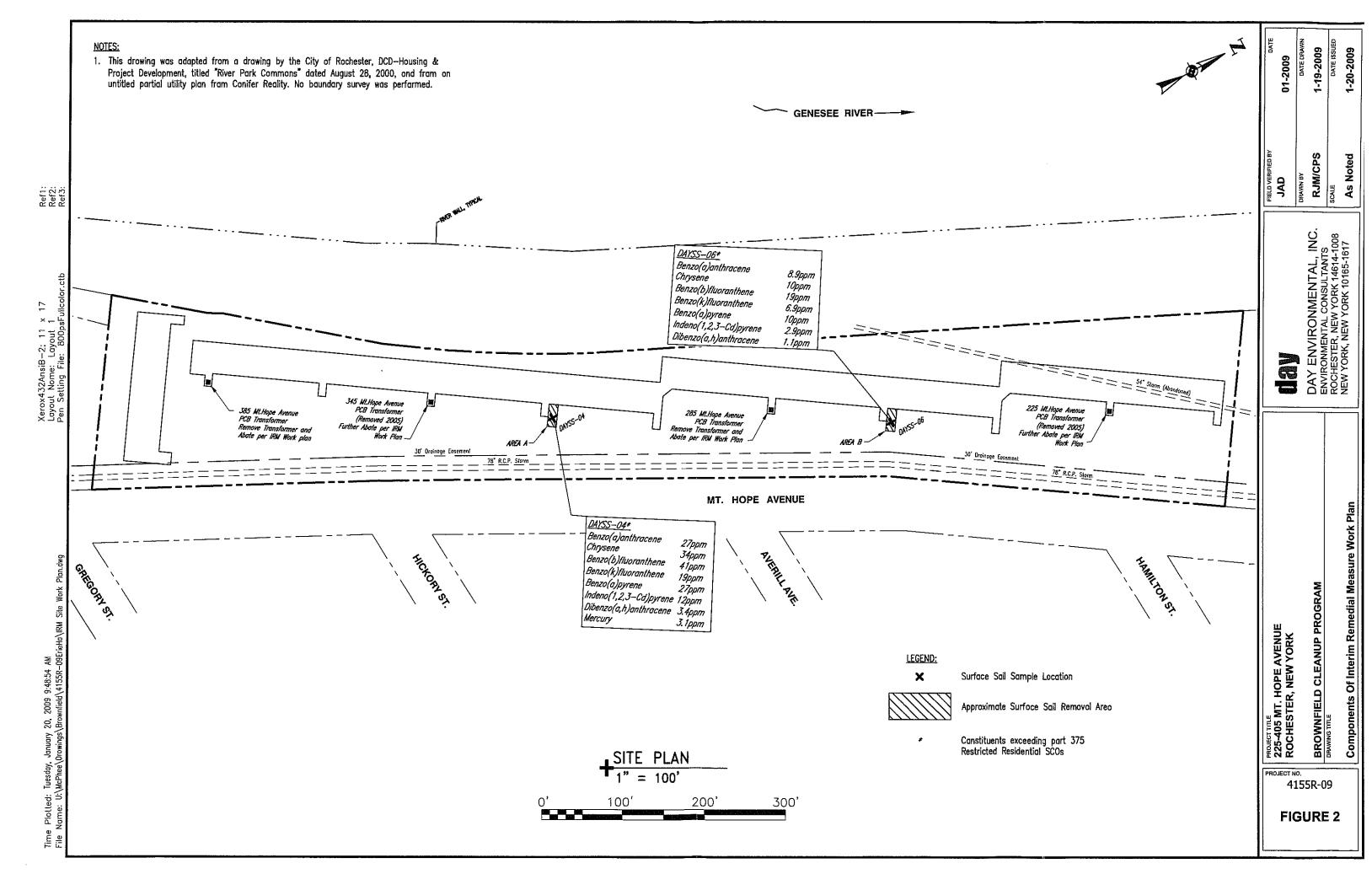
BROWNFIELD CLEANUP PROGRAM

DRAWING TITLE
PROJECT LOCUS MAP

PROJECT NO.

4155R-09

FIGURE 1



Attachment A

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



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.

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

September 14, 2005 Page 3 of 3

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)

CS3608.fmai / 3687S-05

APPENDIX A
Site Sketch

Key: Soil samples, discrete Wipe samples СВ Core samples (1-inch depth) Concrete pavers Grassy area -11-feet l: 4.6 mg/kg 3: ND H: 16 mg/kg **Transformer** location 345 Mount Hope Road Apartment Complex **⊕** С2: 11 п g/kg C: ND ~7.5-feet A: ND D. ND ND -7.5-feet 10-feet **O**G ND -14-feet

Notes:

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

APPENDIX B Analytical Results

Shipping: 6034 Corporate Dr. * E. Syracuse, NY 13057-1017 * (315) 437-0255 * Pax (315) 437-1209 Mailing: Box 289 * Syracuse, NY 13206

Albany (518) 459-3134 * Binghamon [607] 724-0478 * Buffalo (716) 649-2533 Ruchester (586) 436-9070 * New Jersey (201) 343-5353 * South Carolina (864) 878-3280

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

Monday, August 01, 2005

RE: SY005875, Riverpark Commons

Dear Mr. Anthony Napoli:

Order No.: U0507493

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

All snalytical 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 paironage.

Sinceruly,

UPSTATE LABORATORIES, INC.

AJS (PFF)

Anthony J. Scala President/CEO

Upstate Laboratories, Inc. Date: 01-Aug-05 CLIENT: Clean Haibors Env. Sves., Inc. Lab Order: U0507493 l'roject: SY005875, Riverpark Commons Jab ID: U0507493-001 Collection Date: 7/28/05 7:45:00 PM Cheut Sample ID: A Matrix: WIPE Analyses Rosult Limit Qual Units DF Date Analyzed POLYCHLORINATED BIPHENYLS IN WIPES SW8082 (N5503) Analyst: FP Araclar 1016 ND 0.30 µg/wipe 7/28/05 Aroclor 1221 ND 0,30 µg/міре 7/29/05 Aroclor 1232 NO 0.30 µg/wlps 1 7/29/05 Arodor 1242 ND 0.30 h@/wipe 1 7/29/05 Arodol 1248 ND 0.30 na/wibe 1 7/29/05 Aroclor 1251 ND 0.30 µg/wipo 1 7/29/05 Arodor 1260 ND 0.30 µg/wipe 7/29/05 Lab ID: U0507493-002 Collection Date: 7/28/05 7:50:00 PM Client Sunsple 1D: 13 Matrix: WIPE Aimly ses Result Limit Qual Units D); Date Analyzed POLYCHLOR INATED BIPHENYLS IN WIPES SW8082 (N5503)Analyst: FP Aroclor 1010 NO 0.30 h3/wjb4 7/29/05 Arodor 1221 ND 0.30 pg/w/pc 1 7/29/05 Aroclor 1232 ND 0,30 HQ/wipe 7/29/05 Arodor 1242 ND 0.30 h0\wibe 7/29/05 Arockor 1248 ND 0.30 ha/wibe 7/29/05 Amdor 1254 ND 0.30 ha/wibe 7/29/05 Andor 1260 ND 0.30 µg/wipe 7/29/05 Lab ID: U0507493-003 Collection Date: 7/28/05 7:55:00 PM Client Sample ID: C Matrix: WIPE Astalysés Result Linit Qual Units DF Date Analyzed POLYCIILORINATED BIPHENYLS IN WIPES SW8082 (N5503)Analyst: FP Arodor 1016 ND 0.30 #g/wipe 7/20/05 Arodor 1221 ND 0.30 ha/wiba 1 7/29/05 Arodor 1232 ND 0.30 nawipe 1 7/29/05 Aroclor 1242 ND 0,30 pg/w/pa 7/29/05 Araclar 1248 ND 0.30 μαλνίφα 7/29/05 Arodor 1251 ND 0.30 eg/w/gq 1 7/29/03 Arodor 1280 ND 0.30 ug/wipa 7/29/05

Approved By:	PFF	Dale:	8-1-05	• • •
Qualifiers: + 13 t) N 17	Low Level Analyte detected in the associated Medical Islank Unkling times for preparation or analysis exceeded Not Detected at the Reporting Limit	J J	Value excuede Maximum Contains Value above quantitation range Analyte detected below quantitation Spiles Recovery nutside accepted of	an Himits

Qualifiers:

Lowlevel

ND Not Detected at the Reporting Limit

Analyte detected in the associated Method Blank

Holding times for preparation or analysis exceeded

14

1-1

Upstate I.	aboratories, In	C.		Date: 01-Aug-05									
CLIENT: Project:	Clean Harbors Env SY005875, Rivery				Lab Or	der: U0507493							
Lab ID:	U0507493-004			Collection	Date: 7/28	/05 8:00:00 PM							
Client Sample	ID; D				atrix: WIP								
Analyses		Result	Limit (Qual Units	DF	Date Analyzed							
POLYCHLORIF	NATED BIPHENYLS IN	WIPES	SWBO	187 /5/C#	200								
Arnolor 1018		ND	0,30	NS5 (NS5) 49/Mpg	•	Analyst Fi							
Aroclor 1221		ND	0.30	h8ywiba h3ywba	1	7/29/05							
Arodor 1232		ND	0.30	haywpe haywbe	1	7/29/05							
Arodor 1242		ND	0.30	ha√wibe adwida	1	7/29/05							
Arocior 1248		ND	0.30	hā _t wiba	1	7/29/05							
Arottor 1254		ND	0.30	pg/wipa eqiw\gu	1	7/29/05							
Arodor 1280		ND	0.30	hā/w(be	1	7/29/05							
Ladi 1D:	U0507493-005					7/29/05 05 8:05:00 PM							
Client Sample I	D: E				1410:								
Analyses		Result	Limit Q	nal Units	pr	Date Analyzed							
POLYCHLORINA	TEO BIPHENYLS IN Y	A/fOIE e	* * * **										
Arodor 1016		ND	\$W808 0.30	4	•	Analyst: FP							
Aroclor 1221		ND	0.30	µg/wipe	1	7/29/05							
Arocior 1232		ND	0.30	hā/wibe	1	7/29/05							
Arcolor 1242		CIN	0.30	ha/wibe	1	7/29/05							
Areclor 1248		ND	0.30	haywba haywba	1	7/28/05							
Aioclor 1254		ND	0.30	hō/wbs	1	7/29/05							
Arodor 1260		ND	0.30	µg/wipa	1	7/29/05 7/29/05							
ub ID:	1/0507493-006			Collection D	Pto: 7/28/04								
Bent Sample ID	: F				rix: SOIL	6.10:00 PM							
ualyses •	~	Result	Limit Qu	ial Units	DF	Date Analyzed							
OLYCHLORINA	red biphenyls(901L	JSLUDGE)	SW808	(SW35	\$0A)	Analysis Co							
Aroolur 101G		ND	0.0018	mg/Kg-dry	1	Analyst: FP 7/29/05							
Aroclor 1221		ŊD	0.0018	mg/Kg-dry	1	7/29/05 7/29/05							
Aroclor 1232		ND	0.0018	mg/Kg-dry	1	7/28/05							
Aruclor 1242		ND	0.0018	mg/Kg-dry	1	7/29/05							
Arador 1218		ND	0.0018	mg/Kg-dry	1	7/29/05							
Vrocior 1254		ND	0.0018	mg/Kg-dry	1	7/29/05							
Anodor 1260		ND	0.0018	mg/Kg-dry	1	7/29/05							
RCENT MOIST	JRE		D2216	-									
'ercen) Maisture		6.02	0.00100	wl%	1	Analysi: CC 7/29/05							
pproved By:	PFF		D	Pater Q-1	-05	Name 2							
				51	- U.S	Page 2 o							

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8-1-05

Value above quantitation reage

Value exceeds Maximum Contaminum Value

Spike Recuvery outside accepted recovery limits

Analyte detected below quantilation limits

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obstate rat	poratories, Inc.			Date: 01-Aug-05								
CLIENT: Project:	Clean Harbors Env. SY005875, Riverpar	Sves., Inc.	· · · · · · · · · · · · · · · · · · ·		Lab Order: Uos							
Lab ID:	U0507493-007				Collection	Date: 7/201	05 8:15:00 PM					
Client Sampile ID	; G					drix: SOIL		ı				
Analyses		Result	Limi	t Qua	d Units	DF	Dale An	alyxed				
POLYCHLORINAT	ED BIPHENYLS(SOI	USLUDGE)	sv	/80B2	/SWA	5508)	4-					
Aroclor 1016		ND	0.0018		тр/Ка-фу	1	7/29/05	alyst: FF				
Arador 1221		ND	0.0018		mg/Kg-dry	1	7/29/05 7/29/05					
Arodor 1232		ND	0.0018		mg/Kg-dry	1						
Arodor 1242		ND	0.0018		ma/Ka-dry	1	7/29/05 7/29/05					
Aloclor 1248		ND	0.0018		mg/Kg-dry	1	7/29/05					
Aroclor 1254		ND	0.0018		mg/Kg-dry	1	7/29/05 7/29/05					
Arocior 1260		ND	0.0018		mg/Kg-dry	1	7/29/05					
PERCENT MOISTU	RE		Da	216		•						
Percent Molesture		7.07	0.00100	2 10	wt%	1	Ana 7/29/05	lyst; CC				
Lab ID:	U0507493-008	•			Collection Da	Ato: 7/28/0						
Client Sample ID:	11					rix: SOIL	×					
Analyses		Result	Limit	Qual	Units	DF	Data Anal	yzed				
POLYCHLORINATE	d Biphenyls(soil)	SLUDGE)	swe	082	(SW35	50R)						
Aroclor 1016		ND	0.0018	-	mp/Kp-dry	1	7/29/05	yst: FP				
Aractor 1221		ND	0.0018		mg/Kg-dry	1	7/29/05					
Avector 1232		ND	0.0018		mg/Kg-dry	1	7/29/05					
Aroclor 1242		16	0.0018		mg/Kg-dry	i	7/29/05					
Aroclor 124B		ND	0.0018		mg/Kg-dry	1	7/29/05					
Arociór 1254		ND	0.0018		mg/Kg-dry	1	7/29/05					
Arcelor 1260		ND	0.001B		mg/Kg-dry	1	7/29/05					
ERCENT MOISTUR	E		D22	10								
Percent Moisture		7.14	0.00100		wt%			st: CC				
		****	5.00 140		m ((0	1	7/28/05					

Approved By	:	PFF		Datei	Q-l-AF	Dans 2 . En
of rithling v	1)	Low Level Analyse detected in the associated Method Dlank Holding times for preparation or analysis exceeded Not Detected at the Reporting Limit	•	Į.	Value exceeds Maximum Cont Value above quantitation range Analyte detected below quantit Spike Recovery mustide necept	e Pation timits

Date: 01-Aug-05

CLIENT:

Clean Harbors Env. Sves., Inc.

Project:

SY005875, Rivemark Commons

Lab Order:

U0507493

Lab III:	U0507493-009			Collection D	to 2000	
Clicat Sampsie ID:	1				_	12
	-			Mati	rix: SOIL	
Analyses		Result	Limit Qu	ni Units	DF	Date Analyzed
POLYCHLORINATE	D BIPHENYLS(SOI	USLUDGE	5W8082	(SW35	· FAR)	
Arodor 1015	•	NO	0.0019	mg/Kg-dry	7VD} 4	Analyst: FF
Aroclor 1221		ND	0.0019	mg/Kg-dry	1 ◀	7/29/05
Aroctor 1232		NO	0.0019	mg/Kg-dry	1	7/29/05
Arodor 1242		4.6	0.0019	mg/Kg-dry	•	7/29/05
Arector 1248		ND	0.0019	mg/Kg-dry	1	7/29/05
Aracior 1254		ND	0.0019	mg/Kg-dry	1	7/29/08
Aroclor 1260		ND	0.0019	mg/Kg-dry	1	7/29/05
PERCENT MOISTUR	E			But diament	•	7/29/05
Percent Mois Lura	· E	9.60	D2216			Analyst: CO
		2.00	0.00100	wt%	. 1	7/29/05
	U0507493-010			Collection Dul	e: 7/2R/05	8-18-00 PM
lient Sample ID:)				x: SOIL	0.10.00 PM
inalyses		Rosult	Limit Qual		DF	Data Analyzed
OLYCHI.ORENATED	BIPHENYLS(SOIL	SLUDGE)	SW8082	(SW3550) (a)	
Arocior 1010		ND	0.0018	ਜਲ/Kg-dry	1	Analyst: FP 7/29/05
Aredor 1221		ND	0.0018	ing/Kg-dry	•	7/29/05
Areclor (232		ND	0,0018	mg/Kg-dry	•	7/29/05
Arodor 1242		ND	0.0018	mg/Kg-diry	•	7/29/05
Arodor 1248		ND	0.0018	mg/Kg-dry	i	7/29/05
Aroclor 1254		NO	0.0018	mg/Kg-dry	i	7/29/06
Aroclor 1260		ND	0.0018	mg/Kg-dry	•	7/29/05
RCENT MOISTURE			Donac	_ ••	•	********
		_	D2216			Analyst: Co
orcent Moisicure		5.68	0.00100	wt%	1	7/29/05

Approved I	y;	PFF
Onsiliers:	•	Law Level

- 13 Analyte detected in the exsecuted Method Blank
- 14 Holding times the preparation or analysis exceeded
- NO Not Detected at the Reporting Limit

Date:

8-1-05

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- Value execeds Maximum Cuntaminant Value
- E Value above quantitation range
- Analyse detected below quantitation limits
- Spike Recovery outside accepted recovery limits

Date: 01-Aug-05

CLIENT: Project:	Clean Harbors Env. SY005875, Riverpar	Sves., Inc. k Commons			· ·	Lab Ord	der: U0507493
Lab 11):	U0507493-011				Callection	D. t 7100	
Client Sample III	k L						05 8:28:00 PM
Analyses						etrix: SOIL	
***************************************	••	Result	Lim	t Qua	Units	DF	Date Analyzed
POLYCHI O RINAS	red BipHenyls(Soi	1 (6) 1				1 1 1	
Arocior 1016	de Birlienira(20)			V8D82	(SW3	550B)	Analyst: FP
Arodor 1221		ND	0.0018		mg/Kg-dry	1	7/28/05
Arociar 123/2		ND	0.0018		mg/Kg-dry	1	7/29/05
Arador 1242		ND	0.0016		mg/Kg-dry	1	7/29/05
Aroclor 1248		ND	0.0018		mg/Kg-dry	1	7/29/05
Aroclar 1254		NO	0.0018		mg/Kg-dry	1	7/29/05
Aroclor 12GD		ND	8100.0		mg/Kg-dry	1	7/29/05
		ND	0.0018		rng/Kg-dry	1	7/29/05
ercent moistu	RE		Da	216			112000
Percont Mols lure		5.82	0.00100	210	wt%	1	Analyst: CC
ale HD:	U0507493-012				. ()		7/29/05
licul Sample ID;	M						8:30:00 PM
talyses						ix: SOIL	
,	3	Result	Limit	Qual	Units	Dħ	Date Analyzed
LYCHLORINATE	D BIPHENYLS(SOIL)	SLUDGE	SWB	•	(I) *******	"	• ••• .
rocior 1016	(ND	0.0017		(SW35!	,	Analyst: FP
ruciar 1221		ND	0.0017		ng/Kg-dry	1	7/29/05
roctor 1232		NO	0.0017		ng/Kg-dry	1	7/29/05
roctor 1212		ND	0.0017		ng/Kg-dry	1	7/29/05
odor 12:18		ND	0.0017		ng/Kg-dry	1	7/29/05
odor 1254		ND	0.0017 0.0017		ng/Kg-dry	1	7/29/05
ocici 1260		ND	0.0017		19/Kg-dry	1	7/29/03
CENT MOISTUR	•	7 100	V.UU 17	п	ıg/Kg-d ₍ y	1	7/29/08
ucut Molejure	•		D221	6			Amahut, a-
moulete		3.96	0.00100	ш	1%	1	Analyst: CC

- 48	ľ	lst	Ų	Y	CII	

Qualifiera:

- Analyte detected in the associated Method Blank 11
- Holding times for preparation in analysis executed 11
- NO Not Desceive at the Reporting Limit

Date:

8-1-05

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- Value exceeds Maximum Contaminant Value
- Value above quantitation range
- Analyse detected below quantitation limits
- Spike Recovery outside accepted recovery limits

Date: 01-Aug-05

C	איוון.	ľ:

Clean Harbors Env. Sves., Inc.

CLHEAT: Project:	Clean Harbors Env SY005875, Riverpa	. Sves., Inc. ark Commons			I ab Or	der: U0507493
Lab ID:	U0507493-013			Culland	Dec star	
Client Sample 1	D: C-1 Transformer	Vauls			n Date: 7/29. Natrix: DUS	/05 10:30:00 AM
Analyses		Result	Limit	Qual Units	DF	Date Analyzed
POLYCHLORINA	ATED BIPHENYLS(SC	VIL/SLUDGE)	SW	8082 /su	1055000	• • •
VIOUGL 10 IO		ND	0.0064	mg/Kg (3 M	/3550B)	Analyst: FP
Aredor 1221		ND	0.0064	mg/Kg	1	7/29/05
Aroclor 123/2		ND	0.0064		1	7/29/05
Arodor 1242		ND	0.0064	mg/kg	1	7/29/05
Arodor 1248		ND	D.0064	mg/Kg	1	7/20/05
Arodor 1254		ND	0.0064	mg/Kg	1	7/29/05
Arodor 1200		ND	0.0064	mg/Kg	1	7/29/06
Lab IDi	1/0507493-014		0,0004	mg/Kg	1	7/29/05
•	C-2 Transformer V	and t		Collection	Date: 7/29/0	5 10:40:00 AM
Analyses					etrix: DUST	l
ំ		Kesult	Limit (Qual Units	DF	Date Analyzed
POLYCHLORINAT	ed Biphenyls(soil	/SLUDGE)	SW80	199		-
Anciet 1010		ND ND	0.0072	- (4110	550B)	Analyst: FP
Aredor 1221		NO	0.0072	mg/Kg	1	7/29/06
Arodor 1232		ND		rng/Kg	1	7/29/05
Aroclor 1242		11	0.0072	mg/Kg	τ	7/29/06
Arodor 1248		ND	0.0072	mg/Kg	1	7/29/05
Aroclor 1264		-	0.0072	mg/Kg	1	7/29/05
Aroclor 1280		ND	0.0072	mg/Kg	1	7/29/05
ale ID:	1 IOSOGANT COS	ND	0.0072	mg/Kg	1	7/29/05
•	U0507493-015			Collection D	ate: 7/29/05	10:50:00 AM
	C-3 Transformer Vau	it		Mat	rix: DUST	77100 7(10)
nalyses		Result	Limit Q	ual Units	DP	Date Analyzed
OLYCHLORINATE	D BIPHENYLS (SOIL/S	SLUnger	SWBOB			•
4000 1010	= - (NO NO	0.0065	- (-1100	50B)	Analysi: FP
Arodor 1221		ND		mg/Kg	1	7/29/06
vrodor 1232		NO	0.0065	rng/Kg	1	7/29/05
rodor 1242		-	0.005\$	mg/Kg	7	7/29/05
reder 1240		ND	0.0065	mg/Kg	1	7/29/05
codor 1254		ND	0.0065	mg/Kg	1	7/29/06
		NID				1 1 mm of \$100
Arodor 1260		ND ND	0.0005	mg/Kg	1	7/29/05

Approved By:

PFF

Qualifiers:

- В Aualyte detected in the assurated Method Dlank
- Holding trates for proparation or attribysis exceeded. Ħ
- NI > Not Detveted at the Reporting Limit

Date:

8-1-05

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- Value exceeds Maximum Contaminant Value
- Valve above quantitation range E
- Analyte detected below quantitation limits
- Spike Recovery outside accepted recovery limits

Date: 01-Aug-05

CHIENT:

Clean Harbots Env. Sves., Inc.

\$Y005875, Riverpark Commous

Lab Order:

U0507493

Project:	SY005875, Riverpart	k Commons				_	151. O(10/493	
Tab ID:	U0507493-016				Collection Da	1c: 7/29/	05 11:15:00 AM	_
Client Sample ID:	Decon Area					ix: WIPE		
Analyses		Result	Limit	Qua	Unice	DF	Date Analyzed)
POLYCHLORINATI	ed Biphenyls in V	VIPES	we.	8082	(N5503)			
Arodur 1015		ND	0.30	4402	hā/wibe (142203)	1	Analyst: (FP
Arpetor 1221		NO	0.30		из∕мое	1	7/29/05	
Arector 1232		ND	0.30		ha/wibe	1	7/29/05 7/29/05	
Aroclar 1242		ND	0.30		na _{wibe}	1	7/29/05	
Aroclor 124B		ND	0.30		na/wibe	1	7/29/05	
Aroulor 1254		ND	0.30		µg∕wlpe	,	7/29/05	
Aroclor 1260		ND	0.30		havybo	1	7/29/05 7/2 9 /05	
Lah ID:	LI0507493-017		-	(Collection Date	2/20/0		
Client Sample 11):	Bucket					: WIPE	2 11:30:00 ViM	
Analyses		Result	Limit	Qual		DF	Date Analyzed	
POLYCHLORINATE	D BIPHENYLS IN WI	PES	swa	ne>	(NS503)			
Arodor 1016		ND	0.30	4	h8\wibe	1	Analysi; Fi 7/29/05	P
Aroctor 1221		ND	0.30		h@/wlbo	1	7/29/05	
Aroclar 1232		ND	0.30		ug/wipe	1	7/29/05	
Arockyr 1242		ND	0.30		μα/wipe	•	7/29/05	
Arecier 1248		ND	0.30		µg/wipe	•	7/29/05	
Aradior 1254		ND	0.30		µg/wlpe	i	7/29/08	
Arodor 1200		ND	0.30		hBywlba	i	7/29/05	
ab 1D: 1	U0507493-018			C	ollection Date	7/29/05	12:00:00 004	_
tient Sample ID; 1	Forktruck				Matrix		12.00.00 FM	
nalyses		Result	Limit (Qual		DF	Date Analyzed	
DLYCHLORINATED	BIPHENYLS IN WIF	ES	SWed	42	(N5503)			
Arodor 1016		מא	0.30		ug/wipe	1	Analyst: FP	ı
Arodiar 1221		ND	0.30		ng/wibe	1	7/29/05	
Arodor 1232		ND	0.30	•	19/Mipe	•	7/29/05	
Arodor 1242		ND	0.30		iB _{(M} jba iA _{'M} ha	1	7/29/05	
vocior 1248		ND	0.30		iā/miba iā/miba	1	7/29/05	
voctor 1254		ND	0.30		ig/wipe	1	7/29/05	
voctor 1260		ND	0.30		- ,	1	7/29/05	
		140	u.au	- 1	ig/wipe	1	7/29/05	

Approved By:

PFF

Qualifiers

- Low Love!
- f T Analyse detected in the associated Method Plank
- It Holding mines for preparation or analysis exceeded
- NO Not Describe at the Reporting Limit

Date:

8-1-05

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- Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- 3 Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Project Name I Constitutive Recognition	Con- Time 2 Inc. Con- (Law More)	12 20 PM 610 CM 22	(1) (X) (3) (5) (5) (7) (8) (9) 10)	41.2 4cm	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\			(X/X) (A) 1,000	(XXX) (V) 800-	-0x9 [(7) [X)(X)		Pros. Sampled by: (Please Print) An Hich Y Mage 1. ULI truesnal Use Only	200	Helinquished by: (Signature) Date Time Received by: (Signature)	1.1/2/1. 1/2/15 E30	Relinquithed by: (Signature) Date Time Received by: (Signature)	Resnquished by: (Signature) Date Time Received by: (Signature)	Reinquished by: (Signature) Date 1, Fine Rec'n for	TA CONTRACT	Albany Binghamton Fair Lawn (NJ)
Name	rear C	Grab of Corre	3	1		ļ.													the upper	
(375) 437 0255 E.	Fhone t Sre Locaton (Shipt's Location: Date Time	7/25 lor 745 rd WIDE	7.604	-	[\$0\$ "	F	5 513	5	\$	Parameter and method		3)						Note: The numbered columns above cross-reference with the oumbered columns in the upper right-hand comes.	Syracuse Rochester Buffato

	Mon. Drained		`		
Phone:	afor / Apain:	Topics Name	No.		
	Site Location (clty/state)	1	000		Special Tumpround
nason I	Time Matrix	Grab or Ect 2.40	- Uist		Stab Notification
		Comp. (14050	1A0507493 01 21 31 4.		
(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	214 V	7		+	9) ; 10) Remarks
11	#-	9	1 1 1 1 1		10 L
*	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	9	Diff (C) x (X)		
	< 0CX	0	(X) (V (E) (-		
					•
parameter and method	Complete Lead	+			
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2) (So Mosshup) Higher			Company		Delivery (check one):
					D Pickup Dropaff
P		+	Relinquished by: (Signature) Date	Dale Time	Received by (Singstand
					(Salaine)
5)			977	058 50/2/6	
6)			Referquished by: (Signature) Date	Date Time	Received by: (Signature)
7)				• <u> </u>	
(8)			Refinquished by: (Signature) Date	Date Time	Received by: (Signature)
(8)					
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CLIENT: Project:	Clean Harbors Env. S River Park Commons				1	ab Order	: U0508298
Lab ID:	U0508298-001		· · ·		Collection Date	: 8/16/05	
Client Sample ID	: Sample #1				Matrix	: WIPE	
Analyses		Result	Limi	Qua	Units	DF	Date Analyzed
POLYCHLORINA	TED BIPHENYLS IN W	/IPES	SV	/8082	(N5503)		Analyst: LD
Arodor 1016		ND	0.30		pg/wipe	1	8/18/05
Arodor 1221		ND	0.30)	μg/wipe	1	8/18/05
Arodor 1232		ND	0.30		µg/wipe	1	8/18/05
Arodor 1242		ND	0.30		ug/wipe	1	8/18/05
Arodor 1248		ND	0.30		µg/wipe	1	8/18/05
Aroclor 1254		ND	0.30		µg/wipe	1	8/18/05
Arocior 1260		ND	0.30		µg/wipe	1	8/18/05
Lab ID:	U0508298-002	-			Collection Date:	8/16/05	
Client Sample ID:	Sample #2				Matrix:	WIPE	
Analyses		Result	Limit	Qual	Units	DF	Date Analyzed
POLYCHLORINATI	ED BIPHENYLS IN W	PES	wa	8082	(N5503)		Analyst: LD
Arocior 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
Arocior 1242		ND	0.30		µg/wipe	1	8/18/05
Aroclor 1248		ND	0.30		µg/wipe		8/18/05
Aroclor 1254		. ND	0.30		µg/wipe	1	8/18/05
Arocior 1260		ND	0.30		µg/wipe		8/18/05
ab ID:	U0508298-003			(Collection Date:	8/16/05	
lient Sample ID:	Sample #3				Matrix:	WIPE	
nalyses		Result	Limit	Qual	Units	DF	Date Analyzed
OLYCHLORINATE	D BIPHENYLS IN WI	PES	SWE	082	(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/wipa	1	8/18/05
Aroclor 1242		ND	0.30		µg/wipe	1	8/18/05
Aroclor 1248		ND	0.30		μg/wipe	1	8/1 8/05
Aroclor 1254		ND	0.30		μg∕wipe	1	8/18/05
Arodor 1260		ND	0.30		µg/wipe		8/18/05

Approved By:	Date:	Page 1 of 2
O 110		

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

Date: 06-Sep-05

- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

CLIENT: Clean Harbors Env. Svcs., Inc.

Project: River Park Commons

Lab ID: U0508298-004 Collection Date: 8/16/05

Client Sample ID: Sample #4 Matrix: WIPE

Result	Limit Qual	Units	DF	Date Analyzed
IN WIPES	SW8082	(N5503)		Analyst: LD
ND	0.30	µg/wipe	1	8/18/05
ND	0.30	ug/wipe	1	8/18/05
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	IN WIPES ND ND ND ND ND ND ND ND	ND 0.30	IN WIPES SW8082 (N5503) ND 0.30 μg/wipe ND 0.30 μg/wipe	IN WIPES SW8082 (N5503) ND 0.30 μg/wipe 1 ND 0.30 μg/wipe 1

Date: 06-Sep-05

Lab Order:

U0508298

Approved	By: _		Date:	Page 2 of 2
Qualifiers:	•	Low Level	**	Value exceeds Maximum Contaminant Value
	В	Analyte detected in the associated Method Blank	Ε	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

Chipsy lellbon mall



received am 3 1 2009

Clean Harbon Environmental Services, Inc. 1302 West 38th Street Asheshula, OH 44004 440.992.8665 www.deanharbors.com August 26, 2005

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

HAZARDOUS WASTE MANIPEST #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 Operations Manager

Attachment

cc: Job File #3549

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NYG 5440023

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOUD & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212



Please type or print. Do not staple

Center (800) 424-8802 and the NYS Department of Environm

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DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOUD & HAZARDOUS MATERIALS

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HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212

	UNIFORM HAZARDOUS 1. Generator's U	S EPA ID No.	Manifest Doc. No.	2. Page 1 of Information within heavy bold lin is not required by Federal Law.	•
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	3. Generator's Name and Mailing Address	-0	10 1 1 1		
	345 MT. Rope Ave	•		^ NKG 5440023	
H	Rochester, WY 14620		1	B. Generator's ID	
1 1	4. Generator's Telephone Number (585+324-				
ŀ	5. Transporter 1 (Company Name)	6. US EPA ID Number	المائشة بمصاحما	C: State Transporter's ID	
	Clean Harbors Env. Services	BAD0393	12 2 2 3 0	D. Transporter's Telephone (#43-1995-976)	Ž.
-	7. Transporter 2 (Company Nome)	8. US EPA ID Number	100	E. Skale Transporter's ID:	M
ļ	0.0			E. Transporter's Telephone (41 -
	9. Designated Facility Name and Site Address Clean Manbarrs (FPM) SLC. 1102 W 38th St.	10. US EPA ID Number		G. Skale Facility ID	3.65 5.51 2.52
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11	6. GENERATOR'S CERTIFICATION: I hereby declare	hat the contents of this c	onsignment ore fully	and accurately described above by proper shipping	i home
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	ational government regulations and state laws and regula I am a large quantity generator, I certify that I have a pr		the volume and tox	icity of waste generated to the degree I have determ	pr _s
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DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SOLID & HAZARDOUS MATERIALS



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HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212

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UNIFORM HAZARDOUS WASTE MANIFEST	Generator's US EPA ID No.	Monifest Doc. No.	2. Page 1 of	Information within heavy bold line is not required by Federal Law.
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DEPARTMENT OF ENVIRONMENTAL CONSERVATION

DIVISION OF SOULD & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212



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8	3. Generator's Name and Mailing Add	2 12 2 9 9	9,9,5,9,6,7	A 140	LF.				
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2 2	4. Generator's Telephone Number (585-326-	-0512			D. Collet	ani 2 M		
5	5. Transporter 1 (Company Name)		US EPA ID Number	699	7.4	4.1.	ronsporter's ID	1180111,114	
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	and are classified, packed, marked and I	abeled, and are in	all respects in proper	condition for	franspo	or by high	way according to	applicable international	and
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	to be economically practicable and that it present and future threat to human health	and the environmen	nt; OR if I am a small	quantity gen	erator, I	have mad	e a Bood Layy ell chusulth tangging pl	or to minimize my wast	s the le
Н	generation and select the best waste man	agement method th	at is available to me a	nd that I can	afford.			Mo. Day	Year
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HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212

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6) 457-736	3. Generator's Name and Mailing Ad-	Associates 20	* 7	11.5	A. B. Gener	NYG 5	4406	317	
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DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION. OF SOLID & HAZARDOUS MATERIALS



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HAZARDOUS WASTE MANIFEST P.O. Box 12820, Albany, New York 12212

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16. GENERATOR'S CERTIFICATION! Historian Sous Characters of this consignment are fand are classified, packed, marked and labeled, and are in all respects in proper condition for transcriptional government regulations and state laws and regulations. It I am a large quantity generator, I ostify that I have a program in place to reduce the volume and to be economically practicable and that I have to the practicable method of transment, storage	BER 5121	(1.521)	75		- G.	7.	-
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 to be economically practicable and that I have selected the practicable method of treatment, storage account and fives the programment. Of if I am a small quantity generate	div and as	curálely	describe	ed 'abo	ove by	proper shipp	ang no
generation and select the best waste management method that is available to me and that I can affer Printed/Typed Name	toxicity of	waste g	peneraled ipyo.yilne	l to the dable t h effor	e degre	e I. have det which minimi	ermine zes the
17. Transporter 1 Acknowledgement of Receipt of Materials				-	-		(1
Printed/Typed-Name Signature					Mo.	Day	, Yes
rianedy types i tomb				_1			1
18. Transporter 2 Acknowledgement of Receipt of Materials					170	Arrelan	€.
Printed/Typed Name Signature		55			Mo.	Doy .	Ľ
19. Discrepancy Indication Space			150	1	•-	· Æ	ċ
20. Facility Owner or Operator: Certification of receipt of hazardaus materials covered by this man		4	ed in Ren	n 19.			310,00
Printed/Typed Name Signature	ifest excep	OR HOH		-	Mo.	Day	Yea

NYSDEC SPILL REPORT FORM

DEC REGION: SPILL NUMBER: 0550701

345 MT HOPE AVENUE CAHETTEN SPILL NAME: DEC LEAD:

SPILL LOCATION

COMMUNITY:

SPILL DATE: 7/25/2005 **SPILL TIME:** 00:00:00

ALL RECEIVED 7/25/2005 **RECEIVED TIME:** 00:00:00 DATE:

PLACE: 345 MT HOPE AVENUE **COUNTY:** Monroe

STREET: 345 MT HOPE AVENUE ROCHESTER TOWN/CITY: ROCHESTER

MAGGI MEDINA CONTACT: **CONTACT PHONE:**

SPILL REPORTED Other SPILL CAUSE: Equipment Failure BY:

Commercial/Industrial SPILL SOURCE: **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.

SPILLED RECOVERED RESOURCES AFFECTED **MATERIAL CLASS**

GW, SOIL, AIR, Ind AIR, SW, DW, Imp SURF, PCB OIL Petroleum 0.00000G 0.00000G SUBWAY, UTILITY, SEWER,

POTENTIAL SPILLERS

COMPANY **ADDRESS** CONTACT

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

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 Řeport/Spill Closure Report (225 Mt. Hope Avenue)



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

FILECOPY

October 28, 2005

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

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.

- 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/100cm² 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/100cm² 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,

Churche Sundersogain Christie Sunderrajan, E.I.T., CHMM

Sr. Professional

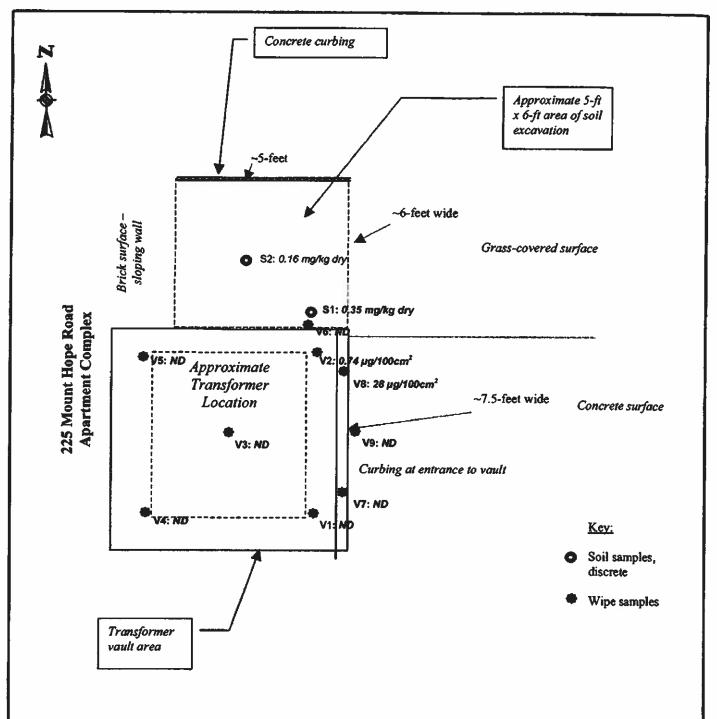
Jeffrey D. Danzinger Project Manager

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.

8/25/05

CMS

SCALE

Not to Scale

day

DAY ENVIRONMENTAL, INC. ENVIRONMENTAL CONSULTANTS ROCHESTER, NEW YORK 14614 PCB Transformer Spill Location 225 Mount Hope Avenue Rochester, New York

PCB Spill Response

DRAWING TITLE SITE SKETCH PROJECT NO.

36878-05

FIGURE 1

APPENDIX B
Analytical Results



Shipping: 6034 Corporate Dr. * E. Symouso, NY 13057-1017 * (315) 437-0255 * Pax (315) 437-1209 Mailing: Box 169 * Syracuse, NY 13206

Albany (618) 459-3134 * Binghamton (607) 724-0478 * Builelo (/16) 649-2533 Ruchester (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 Hurbors 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 patronago.

Sincerely,

UPSTATE LABORATORIES, INC.

AJS (PFF)
Anthony J. Scala
President/CEO

Date: 07-Oct-05

Project:	Chan Harbors Env. S River Park Commons		: 			Lab	Order:	1	U0510070
Lab ID:	170510070-001				Collection	Date: 1	0/5/05 2	2:30:00	PM
Client Sample III	: V6 Right Outer Wi	All .			M	atrix: V	VIPE		
Analyses		Result	Limit	Qual	Units		DF	Date	Analyzed
POLYCHLORINA	TED BIPHENYLS IN W	/IPES	SW	8082	(N55	03)			Analyst: LD
Arador 1016		ND	0.30	-	hB/Mbs	1		10/6/05	
Arodior 1221		ND	0.30		haywibe	1	I	10/6/05	5
Aroclor 1232		ND	0,30		hayyyba	1		10/6/05	5
Aroclor 1242		ND	0.30		ng/wipe	1	:	10/6/05	i
Arador 1248		ND	0.30		µg/wipe	1		10/6/05	i
Aroclor 1254		ND	0.30		μg/wipe	1		10/6/05	•
Aroclor 12G0		ND	0.30		h8/wibe	1		10/6/05	;
Lab ID:	1/0510070-002			(Collection I	Date: 10	0/5/05 2	:35:00	PM
Client Sample ID:	V7 I eft Side of Our	b			Ma	ıtrix; W	TPE		
Analyses		Result	Limit	Qual	Upits		F	Date	Analyzod
POLYCHLORINATI	ED BIPHENYLS IN W	PES	SW	3082	(N55)3)			Analyst: LD
Aroclor 1018		ND	0.30		µg/wipe	1		10/6/05	
Araclor 1221		ND	0.30		hib/wibe	1		10/6/05	f
Aracior 12:92		NO	0.30		µg/wipe	1		10/6/05	i
Aracior 1242		ND	0.30		hB/mjbe	1		10/5/05	
Aroclor 124 II		ND	0.30		pg/wipo	1		10/6/05	ı
Arador 1254		ND	0.30		haywiba	1		10/6/03	
Aracter 1260		ИD	0.30		ha/wibe	1		10/6/05	
ab ID:	U0510070-003			Ċ	Collection [)ale: 10	/5/05 2	:40:00	PM
lient Sausple ID:	V8 Right Side of Car	ъ			Ma	trix: W	UPE		
nalyses		Result	Limit	Quai	Units	D	F	Date	Analyzod
DLYCHLORINATE	D BIPHENYLS IN WI	es	SW8	082	(N550	3)			Analyst: LD
Aroclor 1016		28	0.30		µg/wipe	1		10/6/05	
Arocior 1221		ND	0.30		ha/wibe	1		10/6/05	
Noctor 1232		- ND	0.30		h ō∖w lbe	1		10/6/05	
Vrodor 1242		ND	0.30		hāywiba	1		10/6/05	
\rodor 1248		ND	0.30	ļ	h@ywibe	1		10/6/05	
voctor 1254		מא	0.30	1	entMpu	1		10/6/05	
1000		145	0.30		leight and salt	•		44.444	

Approved 1	ly:	PFF	Date:	. 10-7-05	Page 1 of 2	
Qualifiers:	•	Low Level	37	Value exceeds Maximum Contaminant \	/alus	
R		Analyse descried in the associated Method Hank	E	Value above quantitation range		
H.		holding times for proporation or analysis exceeded	J	Analyte detected below quantilation limits		
NI Not Descried at the Reporting Lamit		Not Detected at the Reporting Lamit	S	Spike Recovery mutride accepted recover	ly limits	

Date: 07-Ocs-05

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

Collection Date: 10/5/05 2:45:00 PM Lab ID: U0510070-004 Matrix: WIPE Client Sample LD: Y9 3' Out From Curb Middic Analyses Result Limit Qual Units DF Date Analyzed POLYCHLORINATED BIPHENYLS IN WIPES SW8082 (N5503) Analyst: LD 1 10/6/05 Arador 1016 powipe ND 0,30 10/6/05 Aroclor 1221 ND QE,0 **pg/wipe** 1 **µg/м**ре Appelor 1233 1 10/6/05 ND 0,30 10/8/05 Aroctor 12-12 0,30 ND µg/wipe 1 10/6/05 Arbelor 1249 μg/w/pa ND 0,30 1 10/0/05 Arocior 1264 ND 0.30 µg/wipe Aruckir 1260 ND 0.30 µg/wipe 10/6/05

Approved By:	PFF	Date:	(e: 10-7-05 Pa		
Qualificaes *	loval wal	**	Value exceeds Maximum Contaminant 1	/aluc	
D	Analyte descried as the reactioned Method Distik	R	Value above quantitation range		
II	Hobling times for perparation or analysis exceeded	J	Analyte detected below quantitation (im-	its	
NO Not Deterted at the Reporting Limit		S	Spike Receivery nutside accepted receive	ry limit	

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8034 Corporate Crive . E. Syracusa, INY 12957-1017 Fax 437 1209 (315), 437 0255

Chair of Crafedy Record

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Buffalo

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Fair Lawn (NJ)

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ATTENTION:

BOB REED

BILLITIER ELECTRIC

585-224-1110

Mr. Anthony Napoli Clean Harbors Env. Sves., Inc. 14 Corporate Circle E. Symcusc, NY 13057

Thursday, October 06, 2005

RE: River Park Commons/Billitier Flectric

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 anomalics 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.

UPSTATTE LABORATORIES, INC.

AJS (PFF)

Anthony J. Scala President/CEO

Upstate Laboratories, Inc. Date: 06-Oct-05 CLIENT: Clean Harbors Env. Sves, Inc. Lab Orderi **U0510056** Project: River Park Commons/Billifor Electric Lab [D: U0510056-001 Collection Date: 10/4/05 8:05:00 PM Client Sample ID: Left Front VI Fir Matrix: WIPE Analyses Result Lindt Qual Units DF Date Analyzed POLYCHLORINATED BIPHENYLS IN WIPES SW8082 (N5503)Analyst LD Arodor 1D16 ND 0.30 μg/wipe 1 10/5/05 Arodor 1221 ND 0.30 μαλνέρο 10/5/05 1 Arodor 1232 ND 0.30 **µg/міре** 1 10/5/05 Aroclor 1242 ND 0.30) jg/wipe 1 10/5/05 Arodor 1248 NO 0.30 **µg/wipe** 1 10/5/05 Arodor 1251 ND 0.30 **POWIPS** 10/5/05 1 Atodor 1250 ND 0.30 pg/wipe 10/5/05 Lah ID: U0510056-002 Collection Date: 10/4/05 8:10:00 PM Client Sample It: Right Front V2 Fir Matrix: WIPE Analyses Result Limit Qual Units DF Date Analyzed POLYCHLORINATED BIPHENYLS IN WIPES SW8082 (N5503) Analyst LD Aracier 1016 ND 0.30 µg/w/pe 10/5/05 Arador 1221 ND 0.30 **ug/wi**pa 10/5/05 1 Aroclor 1232 ND 0.30 10/5/05 μαλνέρε 1 Arodor 1242 ND 0.30 pp/wipe 10/5/05 Aradior 1248 ND 0.30 ng/w/be 10/5/05 Arodor 1254 ND 0.30 **HB/Mpe** 10/5/05 Arodor 1200 0.74 0.30 nalwipe 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 Date Analyzed DF POLYCHLORINATED BIPHENYLS IN WIPES SW8082 (NSS03) Analyst LD Arodur 1016 ND 0.30 µg/wipe 10/5/05 1 Arodor 1221 ND 0.30 **µg/wipe** 1 10/5/05 Aredor 1232 ND **0**E.0 ho/wibe 1 10/5/05 Ajodor 1242 ND 0.30 ug/wipe 1 10/5/05 Arodor 1248 ND 0.30 **POWIDS** 1 10/5/05 Arodor 1254 ND 0.30 µg/wipe 10/5/05 Aredor 1280 ND 0.30 h@wibe 10/5/05

White Learn	ıy:	PFF	Date:	10-6-05	Page 1 of 3		
Qualifers:	•	Low Love	**				
		Analyte detected in the associated Method Blank	E Value above quantitation range				
	11	Holding times for preparation or analysis exceeded		Analyte detected below quantitation limits			
	ND	Not Detected at the Reporting Limit	_	Spike Recovery Outside accepted recovery			

Date: 06-Oct-05

CLIENT: Project:	Clean Marbors Bay. S River Park Commons		· :.		• •	Lab Ord	 U0510056
Lab ID:	U0510056-004		•		Collection Dat	le: 10/4/0	5 8:20:00 PM
Client Sample ID	: Left Rear V4 Fir					x: WIPE	
Analyses		Result	Linu	Qua	l Units	DF	Date Analyzed
POLYCHLORINAT	TED BIPHENYLS IN W	VIPES	SW	18082	(NS503)		Analysis I.D.
Aroclor 1016	•	ND	0.30		fightja (140702)	1	Analyst: LD
Arador 1221		ND	0.30		h0/wpe	•	10/5/05
Aroclor 1232		ND	0.30		haywbe	•	10/5/05
Arodor 1242		ND	0.30		h 5 /wbo	1	10/5/05
Arocior 1248		ND	0.30		na/wipe	1	10/5/05
Arodor 175-1		ND	0.30		рамура	i	10/5/05
Araclor 1260		ND	0.30		µg/wipa	1	10/5/05
lah ID;	U0510056-005				Collection Date	10/4/0°	8:25:00 PM
Client Sample ID:	Right Rear V5 Flr					c: WIPE	01-0104 111
Analyses		Result	Limit	Qual	Units	DF	Date Analyzed
OLYCHLORINATI	ED BIPHENYLS IN W	PEB	SW	082	(N5503)		Anakan sa
Arador 1010		ND	0.30		ug/wipe	1	Analyst: LD 10/5/05
Arodor 1221		ND	0.30		ha/wibe	1	10/6/05
Arodor 1232		ND	0.30		µg/wlpa	1	10/5/05
Arodor 1242		ND	0,30		µg/Wipe	1	10/5/05
Aradior 1248		ND	0.30		μαΛνίρε	1	10/5/05
Arador 1251		ND	0.30		pg/wipe	1	10/5/05
Arodor 1200		ND	0.30		h@/wibe	1	10/5/05
ab ID:	U0510056-006				Collection Date	10/4/05	8:30:00 PM
lient Sample ID;	SI Outside V Right C	Corner			Matrix	: SOIL	-
nalyses		Rosult	Limit (Qual	Units	DF	Date Analyzed
DLYCHLORINATE	D BIPHENYLS(SOIL)	SLUDGE	SWa	082	(\$W3550)	31	Applied to
Arodor 1016	,	ND	0.091		marka-dov	-) 1	Analyst: LD 10/6/05
Aroclor 1221		NO	0.091		mg/kg-diy	1	10/6/05
Arodor 1232	•	ND	0.091		mg/kg-dry	1	10/6/05
Aroclor 1242		NO	0.091		mg/kg-dry	1	10/6/05
Vrodor 1248		ND	0.091		mg/kg-dry	1	10/6/05
tracion 1254		ND	0.091		mg/kg-dry	1	10/6/05
rodur 1280		0.35	0,091		mg/kg-dry	1	10/8/03
RCENT MOISTUR	E		D221	16			Analyst: CC
ercent Mokhira		8.55 0	.00100	-	wil	4	Analyst: CC

Approved	Ry
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Qualifiers:

- Analyze detected in the associated Method (Hank

0.00100

- Holding unies for propagation or analysis exceeded
- ND Not Detected at the Reporting Limit

Dater

wi%

10-6-05

Page 2 of 3

- Value exceeds Maximum Contaminant Value
- Value above quantitation mage
- Analyte detected below quantitation limits
- Spike Recovery outside accepted recovery limits

Date: 06-Oct-05

	Clean Harbors Env. Sv River Purk Commons/	rcs., Inc.	tric		ab Orde		U0510056
Lab ID:	U0510056-007			Collection Date:	10/4/0	5 8:35:00	PM
Client Samplo ID:	S2 Off Middle R. Si	βų		Matrix:	SOIL		
Analyses	* 19 ** *	Result	Limit Qua	l Units	DF	Date	Analyzed
POLYCHLORINATI	ED BIPHENYLS(SOIL)	SLUDGE)	SW8082	(SW3550E	1)	• • • • • • • • • • • • • • • • • • • •	Analyst: LD
Aroclar 101fi	,	ND	0.092	me/ke-dry	, 1	10/6/05	
Arodor 1221		ND	0.092	mg/kg-dry	T	10/6/05	
Arodor 1232		ND	0.092	mg/kg-dry	1	10/8/05	
Aroctor 12/12		ND	0.092	mg/kg-dry	1	10/6/09	
Arector 1248		ND	0.092	mg/kg-dry	1	10/6/05	
Arodor 1264		ND	0,092	mg/kg-dry	1	10/6/05	
Aroclor 1200		0.16	0.092	mg/kg-dry	1	10/8/05	
ERCENT MOISTU	RE		D2216				Analyst: CC
Percent Molslure		9.75	0,00100	w1%	1	10/6/05	Midiyati CC

Approved By:	1	PFF			Date	91	<u>10-6-05</u>	Page 3 of 3
Qualilita:	•	Low Level	4	• -		•	Value execeds Maximum Contamina	•
1	4	Anniye descend in the associated Method Dlank			E	1	Value above quantitation range	

- II I fulding times for propuration or analysis exceeded
- NO Not Detected at the Reporting Limit

- J Analyte detected below quantitation limits
- S Spike Recuvery outside accepted receivery limits

Fair Lawn (NJ)

Binghamton

Albany

Buffelo

Apchester

なのののであ
CHARGES !
TO WETTER

APPENDIX C Manifests DIVISION OF SOLID & HAZARDOUS MATERIALS

1-870 P.003/003 F-289



in cosact anargency or spill immediately call the National Rasponse Center (800) 424-8802 and the NYS Department of Environmental Conservation (578) 457-7362

HAZARDOUS WASTE MANIFEST

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NYSDEC SPILL REPORT FORM

DEC REGION:

8

SPILL NUMBER:

0551001

SPILL NAME:

RIVERPARK COMMONS

DEC LEAD:

MFZAMIAR

SPILL LOCATION

SPILL DATE:

ALL RECEIVED

9/16/2005

SPILL TIME:

00:00:00

DATE:

9/16/2005

RECEIVED TIME:

00:00:00

PLACE:

RIVERPARK

COUNTY: COMMONS

Monroe

STREET:

CONTACT:

225 MT HOPE **AVENUE**

TOWN/CITY:

COMMUNITY:

ROCHESTER

ROCHESTER

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

183 EAST MAIN

ALLAN ROCHESTERNY HANDELMAN

CONIFER REALTORS LLC

STREET

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/m³, and the level that is considered immediately dangerous to life and health (IDLH) is 5 mg/m³.

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