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LETTER OF TRANSMITTAL

TO: Peter S. Ouderki	rk, P.E.	DATE:	October 19, 1999	
Project Manager NYSDEC - 7th Floor 317 Washington St. Watertown, N.Y. 13601		RE:	General Cable	
ATTN:		PROJECT NO. 8514		
▼ KWE ENCLOSE	VIA FAX		VE ARE SENDING	
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ENCLOSED PLEASE F	IND THE FOLLOW	ING:		
ENCLOSED I LEASE I	IIID THE FOLLOW			

1 - PROGRESS RPEORT FOR OCTOBER 1999 ON THE ABOVE REFERENCED PROJECT.



John Sheehan w/encl. C. Sullivan trans.only

Copy to: D. Sweredoski, PE w/encl. B. Kogut w/encl. Signed:

Mark P. Ruhnke

C.A. Gaetano w/encl.

If enclosures are not as noted, please notify us at once.

OLD GENERAL CABLE SITE OCTOBER PROGRESS REPORT VOLUNTARY REMEDIAL AGREEMENT

(INDEX NUMBER: D6-0001-97-07)

DATE ISSUED: October 10, 1999

Old General Cable Site Rome, New York

Completed by:

Jack Eisenbach Engineering, P.C.

Mark P. Ruhnke

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1.0 **SUMMARY**

This monthly progress report summarizes the remedial work completed at the Old General Cable Site (the Site) under the Voluntary Remedial Agreement (VRA) between Charles A. Gaetano (Owner) and the New York State Department of Environmental Conservation (NYSDEC). The remedial work required is identified in the Remedial Work Plans attached to the VRA.

The remedial work began at the Site on the week of September 20, 1999 and is currently in progress.

2.0 CANTERBURY PARCEL

The open excavation from the previously removed underground gasoline storage has been backfilled. The excavation has been brought up to meet existing grade and no further work is required for this parcel under the VRA. JEE will forward a letter to the NYSDEC requesting their concurrence.

3.0 NORTHERN REDEVELOPMENT AREA

The three test baths located in Building 50 were pumped free of liquids and the debris was removed and disposed of as solid waste. The sides and floor of the baths were cleaned and scrubbed. After a visual inspection by the on site Engineer the baths were backfilled with sand from an approved off-site source.

Bagged friable asbestos was discovered buried in one of the three test baths. Upon discovery of the asbestos the NYSDEC and the NYS Department of Labor (NYSDOL) were notified and JEE altered the work plan to handle the material. This alteration to the plan was forwarded to both parties and was implemented by the Contractor (see Appendix A for copy of Alteration to Work Plan).

Mr. Doug Smith, the NYSDEC Investigator has been on site and is investigating the illegal disposal of the discovered asbestos waste.

The contractor has removed the asbestos material and debris from this test bath in double bags and has placed them in a waste trailer. All material will be disposed of as friable asbestos waste.

The sump in former Building #37 was excavated and disposed of as solid waste. The sides and floor of the sump were cleaned and scrubbed. After a visual inspection by the on site Engineer the sump was backfilled with sand from an approved off-site source.

4.0 ROD MILL PARCEL

The concrete sumps in Building 11 were pumped free of liquids and sludge. This waste was transported to Industrial Oil for recycling. A solution containing microbiological agents was applied to the sump walls to loosen and breakdown the oil and sludge. The sides were then scrubbed, and the sludge was removed and stored on site in 55 gallon drums until off site disposal can be arranged. The concrete pad and concrete sumps within the foundation limits were broken-up and will be taken off site as hardfill. Approximately 55 tons of soil were removed as impacted. The sides of the excavation were sampled and results will be forwarded to the DEC when they are received.

APPENDIX A

Alteration to Work Plan



Jack Eisenbach Engineering, P.C.

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General Cable Project Status

MEMORANDUM

DATE:

September 24, 1999

TO:

Mr. Charlie Gaetano - Owner

Mr. Swerdowski -NYSDEC

Mr. Bob Sullivan -USA

Mr. Jack Marsch- NYSDEC

Mr. Dan Coyle -NYSDOL

FROM: Mark Ruhnke

COMMENTS:

1.) During the clean out of the test bath structures located on the Northern redevelopment parcel, friable bagged asbestos was discovered in the bottom of one test bath. Mr. Swerdowski of the NYSDEC and Mr. Dan Coyle of the NYSDOL were notified. Work was stopped and alterations to the work plan have been developed as described below.

Alterations to Work Plan

- a.) An orange construction fence has been placed around the open test bath and asbestos warning signs have been put up.
- b.) The contractors asbestos notifications and specific variance are still valid for site.
- c.) When the asbestos containing test baths is cleaned out, the work area will be defined by an orange construction fence that will have asbestos warning signs posted.
- d.) All workers in the area will be certified by the NYSDOL to handle asbestos.
- e.) Respirators and appropriate disposable coverall suites will be worn during the cleaning. (Two suites shall be worn in work area and one removed prior to going to remote decontamination unit).
- f.) All debris not containing the asbestos will be disposed of accordingly.
- g.) The asbestos debris shall be placed into a sealed container and disposed of as friable asbestos waste with appropriate manifests.
- h.) All workers shall use the remote decontamination immediately when exiting the work area.
- i.) Air samples will be collected as per the specific variance.