

Spill Closure Strategy
Former General Cable Property
Rod Mill Parcel

NYSDEC Spill File Nos.:
0212777 & 0212778
Index No. D6-0001-97-07

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TANK 0212778



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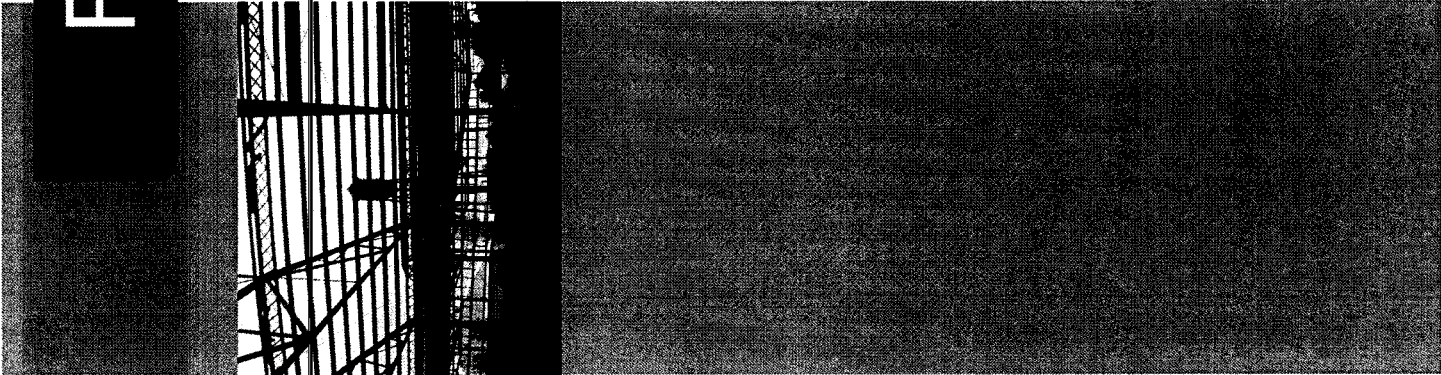
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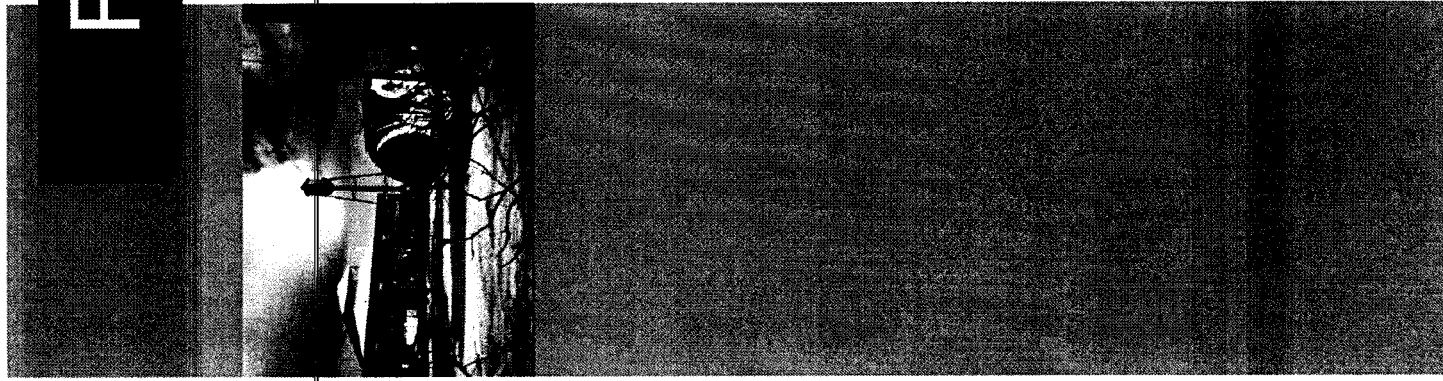
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Former General Cable Property

Agenda

- Review key elements of investigation and remedial history to ensure all parties have same baseline understanding.
- Discuss Spill Closure Work Plan objectives:
 - Verify levels of residual remaining in excavation sidewalls; and
 - Determine source of oil sheen observed in the storm system.
- Outline strategy for spill closure corrective measures.



Former General Cable Property

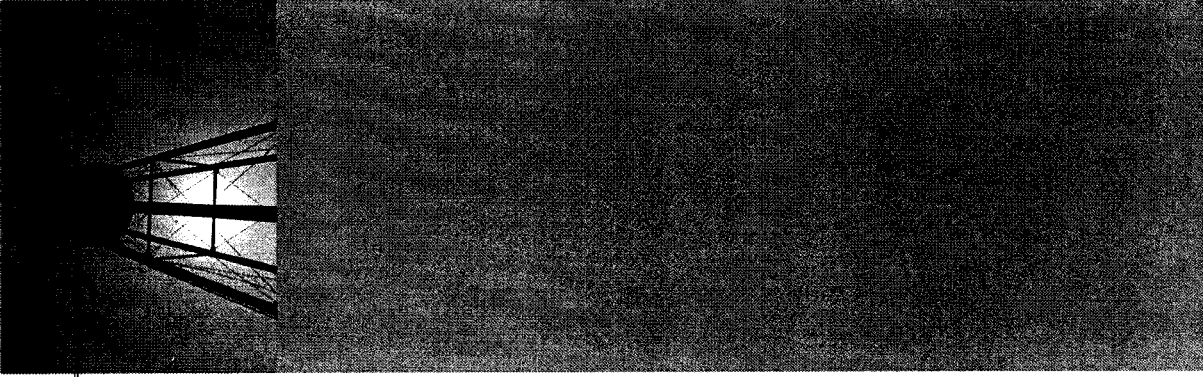
Life After General Cable

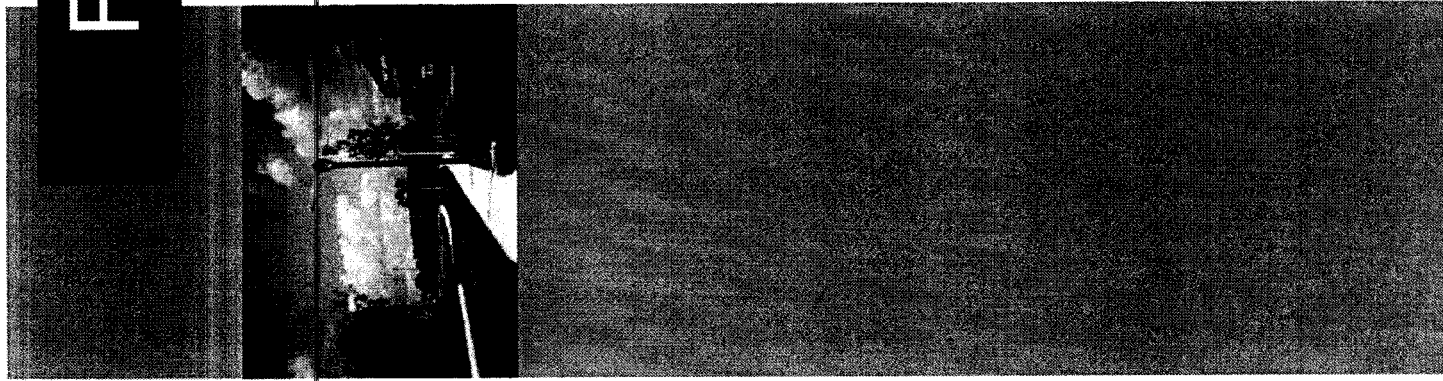
- In 1975, Mr. Charles Gaetano acquired the Site.
- Mr. Gaetano did not operate at the Site.
- Site sat fallow for decades until the mid 1990s.
- The Site was subdivided into 7 parcels to facilitate redevelopment and closure.
- Mr. Gaetano partnered with the City of Rome, EPA, NYSDC and NYSDOT to redevelop the Site and address the Site's environmental conditions, with respect to the roadway improvement.
- Redevelopment of the remaining parcels remained unattainable due to environmental conditions.
- In August 2004, the City of Rome announced that the former General Cable property was selected as the site for its new sports complex.

Former General Cable Property

Remediation and Redevelopment Efforts

- Since 1996, more than \$4 million have been leveraged for assessment, remediation and redevelopment including:
 - \$2.8 million remediation of the Site;
 - More than \$1 million by Mr. Gaetano
 - Asbestos and lead abatement;
 - Building demolition;
 - UST removal;
 - Utility and tunnel cleanup and abandonment; and
 - Soil and groundwater remediation.





Former General Cable Property

Remediation and Redevelopment Efforts

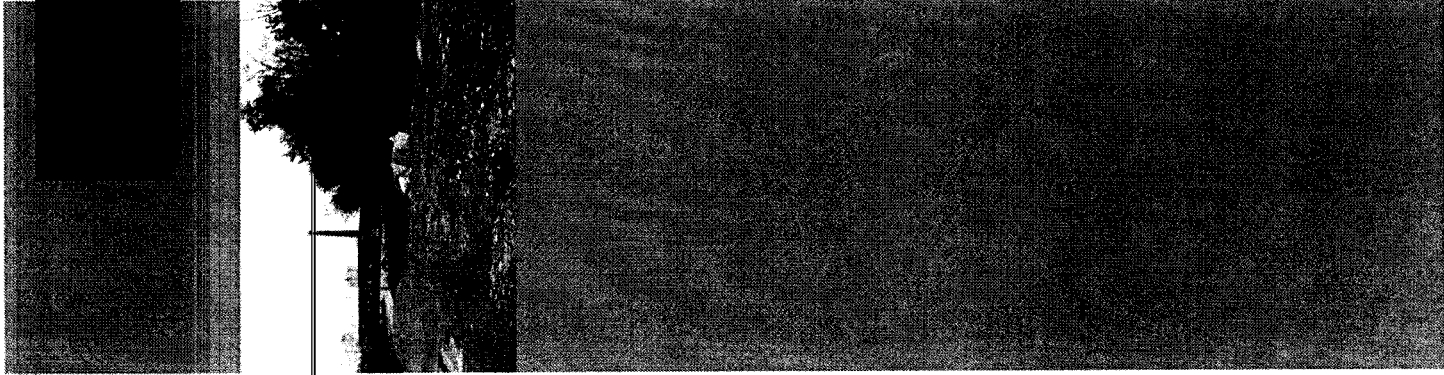
- March 8, 1999 - Mr. Gaetano entered the NYSDEC Voluntary Cleanup Program.
- A new access road, Harbor Way, (Parcel No. 7) was completed.
 - \$1 million from NYSDOT Industrial Access Program
 - \$300,000 from the Empire State Development Corp. for utility modernization
- “No Further Action” letters issued by NYSDEC for:
 - Parcel Nos. 1-4 (“Northern Development Area”)
 - Parcel No. 6 (“Canterbury Parcel”)
- Parcel No. 5 (“Rod Mill Parcel”) still active and requires closure of two spills.
 - Aerial extent of Rod Mill Parcel is 6.1 acres

Rod Mill Parcel

Pre-Remedial Action Investigations

- September 1997, Phase II Investigation conducted by Remedial Technologies, Inc.
 - Advanced 2 soil borings (SB-1 & SB-2) in the vicinity of the former AST.
 - SB-1 was located southeast of the former AST. Soil was sampled at 10-12 ft bgs.
 - 5 SVOCs detected at concentrations < RSCOs.
 - 4 VOCs detected at concentrations < RSCOs.
 - SB-2 located west of storm drain. Saturated soil was sampled at 16-18 ft bgs.
 - 3 SVOCs detected at concentrations < RSCOs
 - VOCs not detected at concentrations > MDLs. Some MDLs > RSCOs (less than 1 order of magnitude).

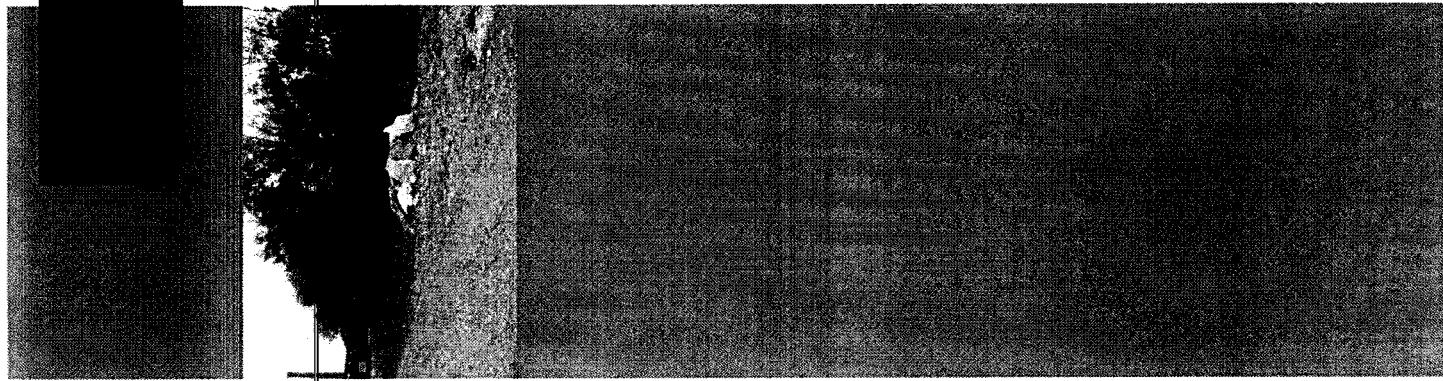
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Pre-Remedial Action Investigations

- April 2001, Petroleum Spill Investigation by Jack Eisenbach Engineering.
 - Advanced 9 soil borings in and adjacent to the excavation area (B-1 through B-9).
 - Soil samples were collected from three borings (B-2, B-4 and B-6). B-2 was the only boring/well located outside the excavation area.
 - B-2 was advanced southwest of the former AST and east of the storm drain. Saturated soil was sampled at 15-16 ft bgs.
 - Napthalene, the only parameter detected, was identified at a concentration < RSCOs.



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Pre-Remedial Action Investigations

- April 2001, Petroleum Spill Investigation by Jack Eisenbach Engineering.
 - Three borings (B-3, B-7 and B-9) were converted to 1-inch diameter wells. B-7 and B-9 were located outside the excavation area.
 - Additionally, groundwater samples were collected directly from the borehole of B-1, B-5, and B-8. B-1 and B-8 were located outside the excavation area.
 - Groundwater analytical results for B-1, B-7, B-8 and B-9 are summarized in the following table.
 - December 1996 groundwater analytical results from monitoring wells MW13S and MW13D are also summarized in the table.

Summary of Detected Parameters - Groundwater Samples

Rod Mill Parcel
Rome, New York

Sample Designation	Groundwater Standard (ug/l)	B-1 (ug/l)	B-7 (MW-7) (ug/l)	B-8 (ug/l)	B-9 (MW-9) (ug/l)	B-9 (MW-9R) (ug/l)	MW-13D (ug/l)	MW-13S (ug/l)
Units								

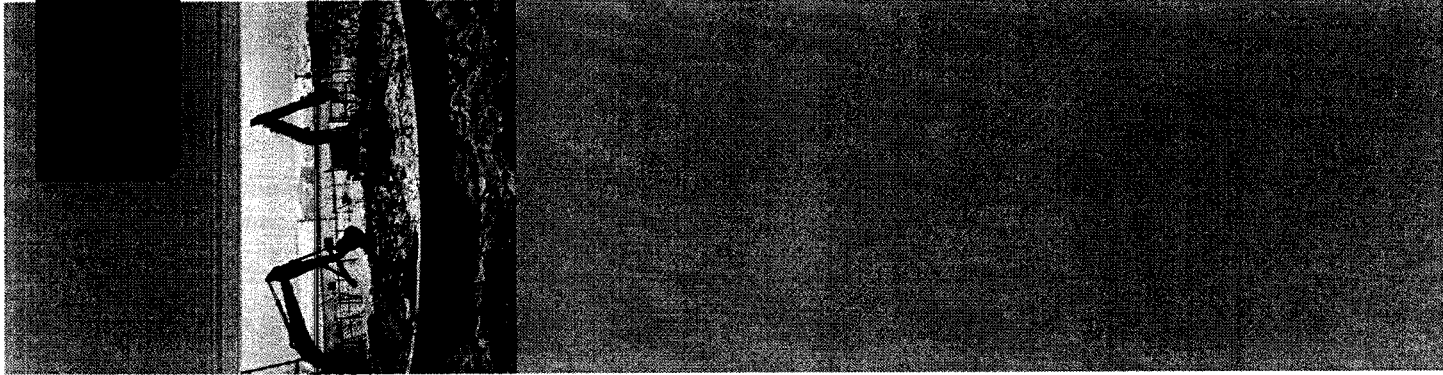
VOCs

1,2,4-Trimethylbenzene	5	ND	18	5	11	11	ND	ND
1,3,5-Trimethylbenzene	5	ND	ND	2	3	3	ND	ND
n-Butylbenzene	5	1	13	5	19	19	ND	ND
sec-Butylbenzene	5	ND	ND	ND	9	9	ND	ND
Naphthalene	10	23	ND	ND	ND	ND	ND	ND

SVOCs

Fluorene	50	ND	7	ND	ND	ND	ND	ND
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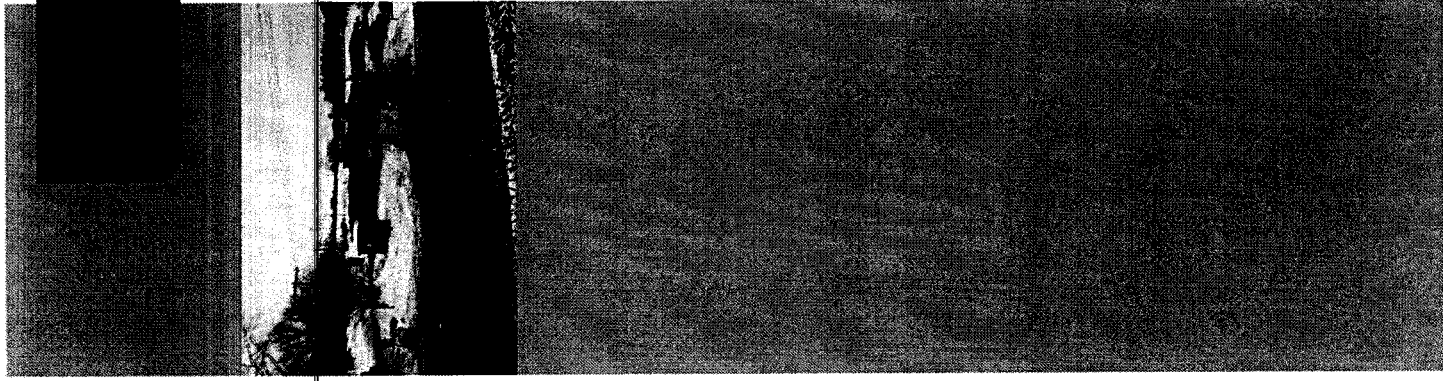
1. All values presented in milligrams per liter (ug/l), approximately equivalent to parts per billion.
2. Monitoring wells were finished as 1-inch diameter wells.



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Spill Closure Remedial Action

- Remedial Action (RA) of petroleum impacts from former 150,000-gallon fuel oil AST was completed in February 2003.
- RA Summary:
 - Excavation extended vertically to bedrock (20 feet bgs);
 - Removal of:
 - 2,155 tons of soil; and
 - 7,000 gallons of water.
 - Pattern of impacts suggest source of impacts was coupling/elbow of northern fuel oil line at tank foundation.
 - Horizontal extent of the excavation was limited by the property lines to the north, east and south.



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Spill Closure Remedial Action

- SVOC laboratory analysis of confirmation samples was complicated due to matrix interference thus producing elevated MDLs.
- At NYSDC's request, two samples from west sidewall (WSW-8-19 & WSW-12-20) were diluted.
 - MDLs were significantly lowered.
 - Six SVOCs were identified in diluted samples at concentrations below NYSDC TAGM 4046 RSCOs.

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RA Summary & Conclusions

- Source removal was accomplished through significant RA soil excavation and groundwater removal.
- Vertical extent of excavation extended to bedrock.
- Horizontal extent of excavation extended to property lines to the north, east and south.
- Two samples from the west side wall did not indicate concentrations of SVOCs above TAGM 4046 RSCOs.
- In addition to the RA, previous investigations identified that impacts in the westerly direction were not extensive.

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Test Pit Investigation – June 2004

- Five test pits (TP-1A through TP-5A) were advanced west of the storm drain by Eisenbach & Ruhne.
- No evidence of impacts were observed in the overburden confirming that there is no continuing source.
- Visual and PID indications alluded to impacts at the groundwater interface (14 feet bgs) in 4 of the 5 locations.
- Saturated soil samples were collected in these 4 test pits at a depth of 14 feet bgs. Soil from the fifth location was sampled at the 9-11 foot interval.
- Analytical results did not identify concentrations of SVOCs above RSCOs.
- Acetone and methylene chloride, typical laboratory contaminants, were the only VOCs detected in the samples.

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Test Pit Investigation Analytical Results

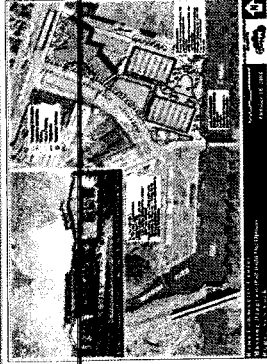
Sample Designation	NYSDEC RSCO (mg/kg)	TP-1A	TP-2A	TP-3A	TP-4A	TP-5A
Sample Depth		14'	14'	14'	14'	9-11'
Units		(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
Acetone	0.2	1	1.1	<0.013	0.87	1.1
Methylene Chloride	0.1	0.44	0.4	0.017	0.33	0.43
2-Methyl Naphthalene	36.4	24	<0.45	<0.43	<0.35	1.8
Phenanthrene	50.0**	6.7	1.7	<0.43	<0.35	0.45

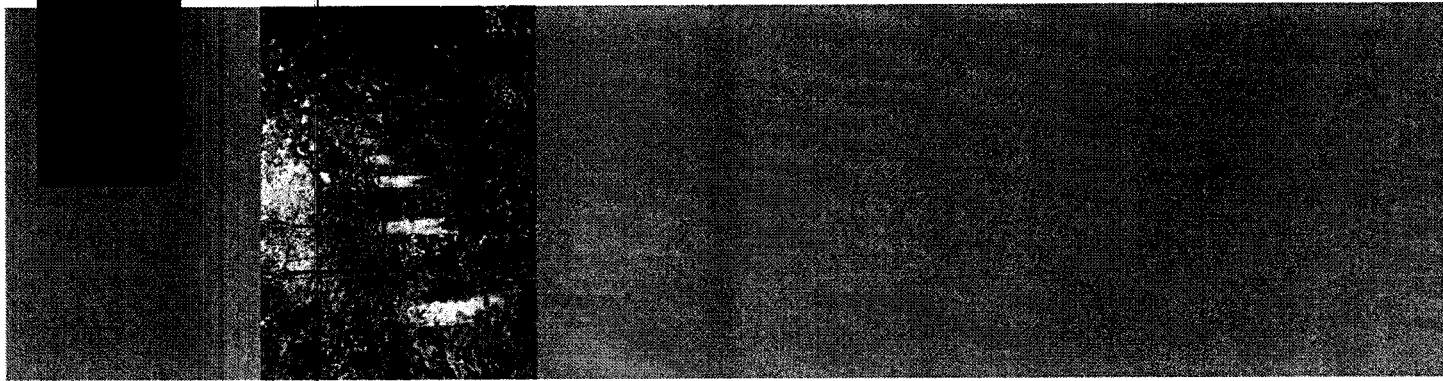
- The laboratory analytical results do not correlate with field observations stated in the text or figures of the investigation letter report prepared by Eisenbach & Ruhnke.
- Analytical results superseded the field observations and indicate levels below RSCOs.

Rod Mill Parcel

Developments Since RA & Test Pits

- August 2004, City of Rome selected the former General Cable Property as the site for its new Sports Complex.
- October 2004. Synapse conducted several site reconnaissances. Reviewed City of Rome files, documents and drawings. Meetings with M. Ruhnke.
- November 3, 2004. Synapse video documented approximately 75 feet of the storm drain.
- November 8, 2004. City of Rome conducted an evaluation of the stormwater system in and around the former General Cable property.
- November 16, 2004. City of Rome DPW Commissioner stated that the City of Rome wants the storm drain and outfall to remain to maintain available capacity.
- December 2004. Met with contractor on site to discuss implementation and obtained cost proposal. Developed Spill Closure Work Plan.

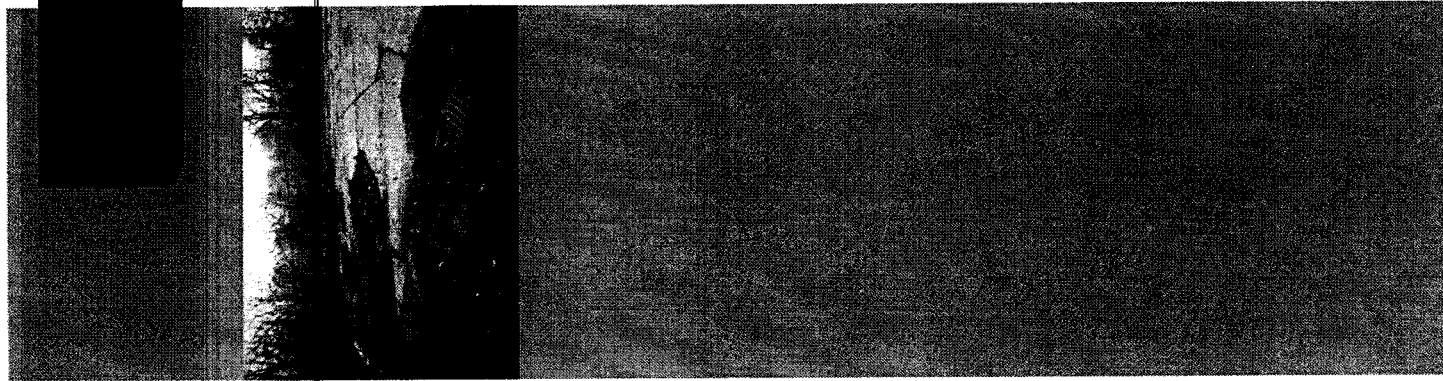




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Spill Closure Corrective Measures

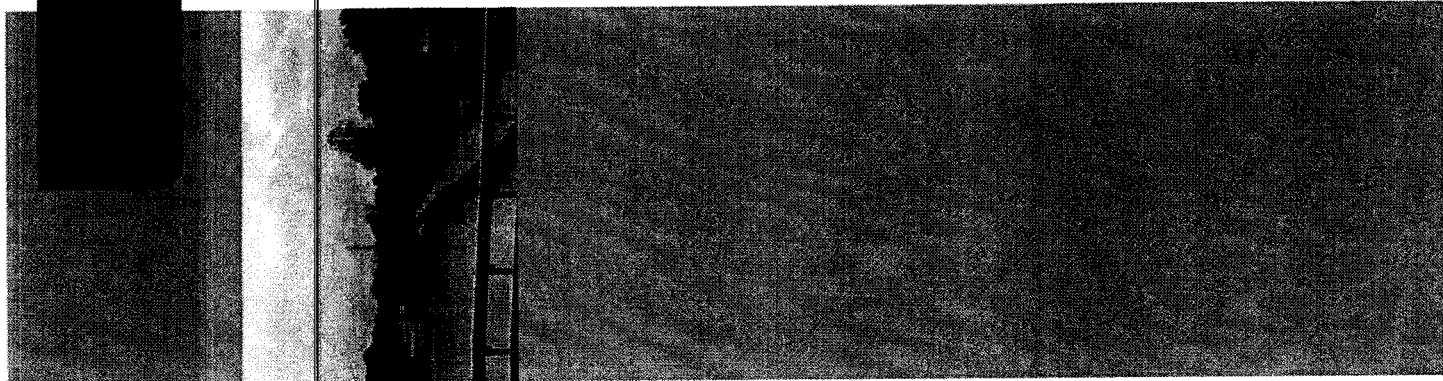
- NYS Canal Corporation Permit
- Verification Sampling for Documentation Purposes
 - One sample will be collected from three of the four sidewalls (north, east and south) in locations similar to the original samples.
 - The laboratory will be notified of potential PAH levels.
- Storm Drain Cleaning
 - Storm drain will be mechanically cleaned to remove large oily debris from the canal to the northern property line (220 lf ±).
 - Material will be collected for proper disposal.



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Spill Closure Corrective Measures

- Storm Drain Slip Lining & Sealing
 - HDPE pipe (24" to 30" diameter) will be placed inside the 36" concrete pipe and sealed.
 - An area of pipe along the northern property line will be uncovered to access the 36" drain line.
 - This is intended to eliminate the migration pathway of residual impacts into the concrete pipe and ultimately the canal.
- Anti-Weep Collar
 - A concrete collar will be placed exterior to the pipe at the southern property line.
 - The collar will extend several feet beyond the pipe in all directions and is intended to prevent migration of potential residual impacts along the pipe bedding.
- Waste Handling
 - Impacted soil and groundwater encountered during the slip lining and anti-weep collar excavations will be properly managed and disposed off.



Rod Mill Parcel

Moving Forward

- File for Canal Corp permit.
- Finalize Spill Closure Work Plan to address both open spills.
- NYSDEC Work Plan approval.
- Contractor procurement and implementation.
- Submittal of Spill Closure Report.
- To be completed by February 2005.