F.1C484W
Gaetano

synapse

August 4, 2005

Peter S. Ouderkirk, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 6
Dulles State Office Building
317 Washington Street
Watertown, NY 13601-3787

transmitted via Overnight Delivery

Re: Voluntary Cleanup Agreement Closure Report
Charles A. Gaetano Voluntary Cleanup Program
Index No. D6-0001-97-07
Spill Numbers: 0212777 & 0212778

Dear Mr. Ouderkirk:

On behalf of Mr. Gaetano, enclosed, please find the Voluntary Cleanup Agreement (VCA) Closure Report for the Rod Mill Parcel, Old General Cable Site in Rome, NY.

As we discussed, Appendix C of the VCA Closure Report, entitled Laboratory Analytical Data Package, has been bound separately and sent directly to Mr. Tim Lebarron of NYSDEC.

Additionally, a draft of the Soils Management Plan and deed restriction will be submitted under separate cover.

Again, thank you for your assistance and patience throughout this process. We look forward to working with you and the Department in the remaining steps to obtain closure of this VCA.

Best regards,

SYNAPSE RISK MANAGEMENT, LLC

Vita DeMarchi, P.G.
Chief Executive Officer

cc: Darrell M. Sweredoski, P.E., NYSDEC (without Appendix C)
Tim Lebarron, NYSDEC (with Appendix C)
Katherine Comerford, NYSDOH (without Appendix C)
Mr. Charles A. Gaetano (without Appendix C)

G:\Clients\GAET\03 Ph 2 Rod Mill\01 VCA\Ltr Ouderkirk.doc

synapse

TRANSMITTAL

Date: August 12, 2005

To: Peter S. Ouderkirk, P.E.

Company: New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 6
Dulles State Office Building
317 Washington Street
Watertown, NY 13601-3787

Re: VCA Closure Report
Charles A. Gaetano
Rome, New York

Qty	Date	Description	Code
1	08/04/05	Portable Document Format – VCA Closure Report	F

Code: **I** For your information **A** For your approval **R** For your review **F** For your files **S** For your signature

Comments:

Dear Peter:

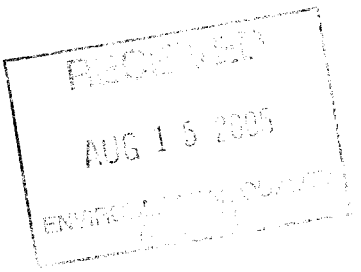
Pursuant to our original August 4, 2005 transmittal of the VCA Closure Report, enclosed please find the report in Portable Document Format.

Please call with any questions or comments.

Best Regards,

SYNAPSE RISK MANAGEMENT, LLC

Brian Macrae
Chief Operating Officer



SYNAPSE RISK MANAGEMENT LLC
400 University Building | 120 East Washington Street | Syracuse, NY 13202 | (315) 475-3700 | (315) 475-3780 | www.synapseriskmanagement.com

synapse

VOLUNTARY CLEANUP AGREEMENT
CLOSURE REPORT

ROD MILL PARCEL
OLD GENERAL CABLE SITE
ROME, NEW YORK

VCA INDEX NO. D6-0001-97-07
NYSDEC SPILL NOS. 02-12777 & 02-12778

Prepared on behalf of:

Charles A. Gaetano
311 Turner Street
Utica, NY 13501

Prepared by:

Synapse Risk Management, LLC
Synapse Engineering, PLLC
400 University Building
120 East Washington Street
Syracuse, NY 13202
(315) 475-3700

August 2005

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

APPENDICES

1.0 INTRODUCTION

On behalf of Mr. Charles A. Gaetano, this Voluntary Cleanup Agreement (VCA) Closure Report has been prepared by Synapse Risk Management, LLC and Synapse Engineering, PLLC (Synapse) to address requirements to obtain closure of the VCA (Index No. D6-0001-97-07) and, simultaneously, the two petroleum spill files (Nos. 02-12777 & 02-12778) associated with the Rod Mill Parcel at the Old General Cable Site located in Rome, New York. The data and findings presented in this VCA Closure Report are based on the corrective actions and investigations set forth in the VCA Closure Workplan (January 2005) that was approved by the New York State Department of Environmental Conservation (NYSDEC) on February 28, 2005.

Remaining environmental regulatory requirements at the Old General Cable Site solely relate to the 6.098-acre Rod Mill Parcel, which is one of seven parcels that originally comprised the approximately 17-acre Old General Cable Site. In order to facilitate its redevelopment, the Old General Cable Site was subdivided into individual parcels of real property in 1997. No further environmental regulatory requirements associated with the VCA or other regulatory programs remain at the other six parcels. The location of the Old General Cable Site in relation to the surrounding area and the property boundaries of the seven parcels are presented on Figure 1 - Property Aerial Map.

The structure of this VCA Closure Report is consistent with requirements set forth in the NYSDEC Draft DER-10, *Technical Guidance for Site Investigation and Remediation*, December 2002 (DER-10).

1.1 Objective

The overall objective of this VCA Closure Report is to document actions required to achieve VCA closure; specifically, requirements and corrective actions related to the closure of two open petroleum spill files assigned to the Rod Mill Parcel. Satisfying the individual closure requirements for each spill concurrently satisfies the remaining closure requirements for the VCA. This VCA Closure Report outlines the corrective actions conducted to obtain spill closure.

1.2 History

The approximately 17-acre Old General Cable Site is located in an industrial redevelopment area in the City of Rome, New York, and was owned and operated by General Cable Corporation dating back to the early 1920s. Mr. Charles Gaetano acquired ownership of the Old General Cable Site in 1975 and has never operated at the site.

In the mid-1990s, Mr. Gaetano, the City of Rome, the United States Environmental Protection Agency (USEPA), NYSDEC, and the New York State Department of Transportation partnered to address environmental conditions at the seven parcels in preparation for future redevelopment. At that time, the Old General Cable Site had been subdivided into seven parcels to facilitate redevelopment and closure efforts.

The seven parcels have been treated individually throughout the regulatory process. With the exception of the Rod Mill Parcel (Parcel No. 5), the other six parcels have previously been remediated to the satisfaction of NYSDEC, as indicated below:

- NYSDEC issued a Release and Covenant Not to Sue for Parcel Nos. 1-4 (the Northern Development Area) dated January 5, 2001, which was conveyed to the City of Rome in May 2002;
- NYSDEC issued a Release and Covenant Not to Sue for Parcel No. 6 (the Canterbury Parcel) dated September 22, 2000; and
- Parcel No. 7 (the Roadway Right-of-Way Parcel) was successfully remediated in accordance with a Record of Decision issued by NYSDEC under the Clean Water/Clean Air (CW/CA) Bond Act of 1996. The Roadway Parcel was conveyed to the City of Rome in May 1997, and subsequently redeveloped with the construction of Harbor Way, a public road.

Given successful completion of remedial activities and regulatory release on Parcel Nos. 1-4, 6 and 7, this report addresses only the Rod Mill Parcel (the Property).

1.3 Remedial Action to Date

Remedial actions conducted on the Property pursuant to the VCA have been performed by both Mr. Gaetano and the City of Rome. The Property is provided on Figure 2 - Rod Mill Parcel Plan. The City of Rome completed select remedial actions on the Rod Mill Parcel as part of its municipal brownfield remedial program obligations under the CW/CA Bond Act for the Roadway Right-of-Way Parcel that included the following:

- Asbestos abatement in Building Nos. 11 and 13;
- Sump cleanout in Building 13; and
- Storm drain clean out and abandonment of lines that drained to the Roadway Parcel.

Pursuant to the VCA, the NYSDEC-approved Rod Mill Parcel Work Plan, dated January 2000, set forth the following proposed remedial actions to be undertaken by Mr. Gaetano:

- Clean out of an oil sump in Building 11 followed by remediation of petroleum impacted soil;
- Clean out of certain storm drain lines; and
- Investigation and remediation of petroleum impacted soil associated with the former 150,000-gallon fuel oil aboveground storage tank (AST) and pump house.

The above activities, with the exception of the petroleum impacted soil remediation associated with the former AST, were completed in 2000, and are summarized in the Rod Mill Parcel Environmental Remediation Closure Report dated April 26, 2001, prepared by Jack Eisenbach Engineering, P.C. (JEE).

The former AST Remedial Action (AST RA) was subsequently completed in 2003, and summarized in the Rod Mill Parcel Remedial Action Closure Report (Amendment to Environmental Remediation Closure Report), dated May 30, 2003, prepared by JEE. In summary, the 2003 AST RA included:

- Excavation of approximately 2,155 tons of petroleum–impacted soil in the area of the former AST to a maximum depth of 20 feet (ft) below ground surface (bgs), and horizontally to the limits of the property lines/fence line to the north, south, and east. The excavation extend to the west to an existing storm drain;
- Disposal of excavated soil as a non-hazardous waste at the Madison County Sanitary Landfill; and
- Removal of approximately 7,000 gallons of petroleum impacted wastewater from the former AST excavation and off-site treatment and disposal by the Oneida County Department of Water Quality and Water Pollution Control.

Following the 2003 AST RA, an oily sheen was observed emanating from the Barge Canal storm drain outlet in March 2003. NYSDEC suspected the sheen originated from the Property and as a result, assigned a spill file to the Property (Spill No. 0212777). At that time, a second spill file (Spill No. 0212778) was assigned to the Property associated with the 2003 AST RA.

1.4 Proposed Future Use

In August 2004, the City of Rome announced its selection of the Old General Cable Site including the Rod Mill Parcel, as the future location of the Rome Community Recreational Center. Preliminary features of the proposed community center will consist of the following primary building, outdoor, and canal-side components:

Building Components

- Ice Rink;
- Two indoor soccer fields; and
- Possible health and fitness center, basketball/volleyball gymnasium, aerobics training, batting cages, bullpens, game room, and additional meeting rooms.

Outdoor Components

- Restored water tower as focal point/landmark;
- Two soccer/multi-sport fields;
- Parking areas;
- Landscaped railroad median;
- Rest rooms/concessions near fields; and
- Picnic / Passive Use Area / Pavilions.

Canal-Site Improvements

- Boat dock / canal-side walkway;
- Fishing access;
- Boat house; and
- Pedestrian path connection to Bellamy Park (below bridge).

The Rod Mill parcel is intended to be transferred to the City of Rome at the completion of this VCA for inclusion in the Rome Community Recreational provided in Appendix A – Rome Community Center Massing Diagram (Full Build-Out Option).

2.0 PRELIMINARY INSPECTIONS AND REVIEWS

Since October 2004, Synapse has been engaged in and completed an extensive records review, several on-site inspections, and interviews with persons knowledgeable of the Property history to set forth a VCA closure strategy for the Property that balances the need to protect human health and the environment with redevelopment alternatives. These efforts focused on the remaining closure requirements for the VCA:

- The former AST and pump house areas;
- The adjacent 36-inch diameter storm drain; and
- Groundwater in the southeast portion of the Property.

With the exception of the groundwater review described in Section 2.3, the results and conclusions drawn by Synapse, based on the preliminary inspections and reviews, were shared with NYSDEC during a December 15, 2004 meeting. Synapse summarized the meeting discussions and resolutions in a January 10, 2005 letter to NYSDEC. Results from Synapse's preliminary inspections, records review, and interviews are presented below.

2.1 Former AST and Pump House

Former AST

A discrepancy between the figures that were prepared by JEE and NYSDEC field observations relative to the aerial extent of the 2003 AST RA soil excavation required resolution to accurately verify the horizontal limits.

The extent of actual remedial excavation compared to the original extent of excavation proposed by JEE in the RA Work Plan (*Figure 3, Estimated Extent of Spill Area, Remedial Excavation*) is shown on Figure 3 - Groundwater Contour Map.

Former Pump House

Removal of soil west of the storm drain was originally proposed by JEE and approved by NYSDEC to incorporate potentially impacted soil that may have been associated with a former pump house and the pipe running thereto. Original facility drawings (circa 1943) show a pump house located northwest of the former AST and it was those drawings that served as the basis for the proposed excavation design.

Investigative and remedial actions conducted at the property since 1997 suggest that the former pump house was not located as shown on the 1943 facility drawings. First, there have been no surficial features on the Property indicating the former pump house location. During the February 2003 RA, JEE and NYSDEC observed that the 2-inch fuel oil pipe, depicted in the 1943 drawings, extending from the tank to the northwest, actually emanated from the north of the former tank. Additionally, laboratory analysis of a soil and groundwater sample collected in the vicinity of the former pump house during previous investigations did not suggest gross impacts. Given the above, it is unlikely that the former pump house was located northwest of the former tank.

2.2 Storm Drain

Synapse conducted several inspections of the 36-inch storm drain system, depicted on Figure 3, to evaluate the source and appropriate corrective action required to mitigate the oil sheen observed at the Barge Canal outlet. These activities included the following:

- A thorough review of the City of Rome's and Mr. Gaetano's files, documents, and drawings;
- A November 2004 video inspection of the storm drain conducted by Synapse that is further discussed below in Section 2.2.1;
- A November 2004 evaluation of the storm water drainage system for the entire 17-acre Old General Cable Site conducted by the City of Rome and Synapse. The evaluation focused on the existing storm water drainage system at the Property, and the city's long-term need for the existing storm drain infrastructure running beneath the Property;
- Meetings between Synapse and several construction contractors to discuss potential remedial alternatives for the storm drain; and
- Visual inspection from the Barge Canal outlet to MH-1 on May 3, 2005 that identified no sediment or impacts, only some minor debris.

2.2.1 Video Inspection

On November 3, 2004, Synapse video-documented approximately 75 linear feet of the storm drain utilizing a robotic camera. Some petroleum impacted sediment and debris was observed in the bottom of the storm drain upstream of Manhole MH-1. Sections of the storm drain downstream of Manhole MH-1 were notably less impacted, suggesting the cause of the sheen is located upstream of Manhole MH-1.

The storm drain was accessed through Manhole MH-1. Debris encountered both upstream and downstream of manhole MH-1 prevented video documentation of the entire length of the 36-inch reinforced concrete pipe (RCP) storm drain. However, the video documentation did provide additional information as to the storm drain's overall structural condition and of the nature of the material in the storm drain.

Based on recent inspections and reviews, the sheen observed at the Barge Canal outlet can not be definitively and solely attributed to residual petroleum impacts associated with the former AST RA adjacent to the storm drain. There is data suggesting the sheen may be attributable to oily sediment and debris, in part or entirely, from inside the storm drain itself between manholes MH-2 and MH-1.

2.3 Groundwater Review

On December 30, 2004, a total of six existing monitoring wells were accessed to gauge groundwater levels in the southeast portion of the Property. Synapse surveyed the top of casing to set elevations and total well depth to provide a basis for groundwater elevations, and to normalize subsequent water level readings. Additionally the surface water elevation of the Barge Canal was measured.

Monitoring wells that were accessed as part of this review included three monitoring wells (MW-B-2, MW-2S and MW-4S), installed by Remediation Technologies, Inc. during a 1997 Phase II ESA, and three temporary monitoring wells (MW-2, MW-7 and MW-9), installed by Eisenbach & Ruhnke Engineering, P.C. (E&R), formerly JEE, prior to the 2003 AST RA.

Figure 3 shows the monitoring well locations and calculated water elevations. This information was reduced to provide the groundwater contours. Groundwater flows in this vicinity of the property are to the south towards the Barge Canal.

Groundwater elevations were measured using an oil/water interface meter. Groundwater in all six wells did not exhibit evidence of sheen or separate phase petroleum hydrocarbons.

3.0 HEALTH AND SAFETY PROGRAM

A site-specific Health and Safety Plan (HASP) was adhered to during the field program addressing the field work set forth in this VCA Closure Workplan. The HASP was written in conformance with Occupational Safety and Health Administration (OSHA) and applicable USEPA regulations.

The objective of the HASP was to provide a mechanism for establishing safe working conditions and procedures specific to the forgoing corrective action. The safety organization, procedures, and protective equipment were established based upon an analysis of potential physical, chemical, and biological hazards onsite. Specific hazard control methodologies were identified to minimize the potential of accident or injury for all proposed activities.

VOC Monitoring

Volatile organic compounds (VOCs) were monitored at one downwind and one upwind perimeter location immediately outside the exclusion zone on a continuous basis. A MiniRAE® 2000 photoionization detector (PID) with a 10.6 electron volt (eV) lamp was calibrated to calculate 15-minute running average concentrations at the downwind and upwind perimeters and within the exclusion zone. The following summarizes the VOC monitoring implemented during the non-intrusive and intrusive activities conducted in support of the VCA Closure Workplan.

- At no time did the ambient air concentration of total organic vapors recorded at the downwind perimeter of the work area or exclusion zone exceed 1 parts per million (ppm) above background (i.e. upwind perimeter location) for the 15-minute average.

Particulate Monitoring

Particulate concentrations were monitored on at one downwind perimeter location immediately outside the exclusion zone on a continuous basis. A MIE Pdr-1000® capable of monitoring particulate matter less than 10 micrometers (um) (PM-10) integrated over a period of 15 minutes. The following summarizes the particulate monitoring implemented during the non-intrusive and intrusive activities conducted in support of the VCA Closure Workplan.

- At no time did the recorded downwind PM-10 particulate level exceed 100 micrograms per cubic meter (mg/m^3) greater than background (upwind perimeter) for the 15-minute period. Additionally, airborne dust was not observed leaving the exclusion zone area.

4.0 SCOPE OF WORK

The overall VCA closure objective completed to address remaining issues associated with the two open spill files at the Property, was accomplished by implementing the following activities:

- Document soil conditions north, east, south, and west of the 2003 AST excavation sidewalls;
- Document subsurface soil and groundwater conditions in the location of the former pump house as shown on original facility drawings west of the storm drain;
- Cleaning of the storm drain followed by an integrity evaluation and an effectiveness assessment; and
- Preparation and submittal of VCA completion documentation.

A detailed description of the field activities performed at the property are provided below.

4.1 2003 AST RA Excavation Sidewall Documentation

The horizontal extent of the 2003 AST RA excavation area extended to the property boundary/fence line to the north, south, and east, and west to the storm drain. Due to matrix interference associated with the original sidewall verification samples collected by E&R in February 2003, the reported analytical results were not satisfactory to NYSDEC. Given this and the current regulatory requirement to analyze for tentatively identified compounds (TICs), NYSDEC determined verification soil samples would be necessary for proper documentation of the 2003 AST RA. This section describes the sampling activities, procedures, and rationale associated with the field activities that documented the horizontal extent of soil impacts at the 2003 AST RA excavation sidewalls.

4.1.1 Sidewall Verification Soil Borings

On February 23, 2005 Synapse mobilized to the Property to oversee and document the field activities associated with the verification of the horizontal extent of the 2003 AST RA excavation area. Parratt-Wolff (P-W) of East Syracuse, New York advanced the GeoProbe® soil borings. One soil boring was advanced to a depth of 16 feet below ground surface (bgs), at each of the four sidewall locations. The NYSDEC was present during the field activities. NYSDEC and Synapse concurred as to the select boring locations, field observations, and subsurface conditions in the 2003 AST RA area. Locations of the soil borings, identified as SSB-1, SSB-2, SSB-3 and SSB-4, respectively, are provided on Figure 4 – As-Built Corrective Action Plan. The following summarizes the sample location and rational related to the 2003 AST RA excavation documentation:

Sample ID	Sample Interval	Rationale	Sample Type
SSB-1	11' – 12'	Verify North Sidewall Limits	Primary
SSB-2	7.5' – 8'	Verify East Sidewall Limits	Primary
SSB-3	11' – 11.5'	Verify South Sidewall Limits	Primary
SSB-4	7.5' – 8'	Verify West Sidewall Limits	Primary
22305	11' – 12'	Verify North Sidewall Limits	QA/QC - Blind Duplicate of SSB-1

During advancement of the soil borings, soil samples were continuously collected to the groundwater interface via the 4-foot GeoProbe macro-barrel tube sampler. The continuous soil samples were visually described and logged using the New York State Department of Transportation (NYSDOT) soil description procedure and field screened for the presence of VOCs utilizing a PID. A detailed description of the soil profile and PID screening results are presented in Appendix B – Soil Boring Logs. Soil samples were classified for soil color, composition, moisture content, and any indication of impact (staining, discoloration, and odor).

PID field screening of unsaturated soil samples did not identify measurable levels of VOCs in any of the soil borings. Given these results, unsaturated soil samples were collected for laboratory analysis from approximately 12 inches above the groundwater interface. Slightly elevated PID readings were measured in soil borings SSB-4 within the saturated zone with a maximum concentration of 6 parts per million (ppm).

The extracted soil samples were placed into two 4-ounce sample containers provided by the laboratory. The filled sample containers were then secured in an insulated transport container and stored at four degrees Celsius on wet ice for delivery to the laboratory. Upon completion, the soil borings were backfilled to within one foot of the ground surface with hydrated bentonite, and sealed at the ground surface with local material.

Soil samples and quality assurance/quality control (QA/QC) samples, as described in Section 4.2, were submitted to Severn Trent Laboratories (STL) of Amherst, New York for analysis of the following parameters:

- VOCs in accordance with USEPA Method 8260 plus TICs; and
- Semi-volatile organic compounds (SVOCs) in accordance with USEPA Method 8270; plus TICs.

The laboratory was notified in advance of the potential for elevated concentrations of degraded petroleum hydrocarbons in the samples to ensure that the laboratory achieve acceptable reporting limits. The laboratory analytical data package including the Data Usability Summary Report is provided in Appendix C – Laboratory Analytical Data Package (Bound Separately).

4.1.2 Sidewall Verification Sample Analytical Results

Four verification soil samples SSB-1, SSB-2, SSB-3, and SSB-4, and one blind duplicate QA/QC sample of SSB-1, identified as 22305, were analyzed for VOCs, plus TICs and SVOCs, plus TICs. The analytical results are presented in Table 1 – Soil Analytical Results and summarized as follows:

- With the exception of three parameters, laboratory analytical results of the four sidewall soil samples (SSB-1, SSB-2, SSB-3 and SSB-4) did not identify concentrations of VOCs, SVOCs or respective TICs above NYSDEC Recommended Soil Cleanup Objectives (RSCOs).
- Analytical results of two soil samples SSB-2 and SSB-4 collected from the 2003 AST RA east and west sidewalls, respectively indicated the presence of two VOCs at concentrations that exceed the NYSDEC RSCOs.

  - Methylene chloride was detected at an estimated concentration of 4 mg/kg in soil sample SSB-2. The methylene chloride RSCO is 0.1 mg/kg; and
  - Acetone was detected at a concentration of 25 mg/kg in soil sample SSB-4. The acetone RSCO is 0.2 mg/kg. Acetone is a common laboratory contaminant.
- One SVOC, phenol, was detected in four sidewall and one blind duplicate QA/QC sample at estimated concentrations ranging from 0.045 to 0.120 mg/kg, which exceeds the phenol RSCO of 0.03 mg/kg. However, phenol was also identified in the method blank and therefore may be an indication of laboratory contamination.
- No TICs were identified at concentrations in excess of NYSDEC RSCOs from the sidewall soil samples collected from the 2003 AST RA.
- Additionally, visual and olfactory observations, during the advancement of these soil borings did not indicate any evidence of gross contamination.

4.2 Originally Proposed Excavation Area – Former Pump House

Removal of soil west of the storm drain was originally proposed by JEE in the RA Work Plan and approved by NYSDEC to incorporate potentially impacted soil that may have been associated with a former pump house and the pipe running thereto. Original facility drawings (circa 1943) show a pump house located northwest of the former AST and it was those drawings that served as the basis for the proposed excavation design. Investigative and remedial actions conducted at the property since 1997, suggest that the former pump house was not located as shown on the 1943 facility drawings.

Given this discrepancy and to document subsurface soil and groundwater conditions in this area, GeoProbe soil borings designated, SSB-5 and SSB-6 were advanced west of the storm drain in the area depicted by JEE in the RA Work Plan to a depth of approximately 20 feet bgs, approximately 3.5 feet below the groundwater interface. The location of soil borings SSB-5 and SSB-6 are provided on Figure 4. NYSDEC was present during the field activities. NYSDEC and Synapse concurred as to the select boring locations, field observations, and subsurface conditions in the former pump house area.

Soil

During advancement of soil borings SSB-5 and SSB-6, unsaturated soil samples were continuously collected via the GeoProbe macro-barrel tube sampler, into groundwater which was encountered in these two borings at approximately 16.5 ft bgs. Soil sample descriptions were logged using NYSDOT soil description protocols, and field screened for the presence of VOCs utilizing a PID. Field screening, including visual and olfactory observations, during the advancement of these soil borings did not indicate any evidence of gross contamination. Based on the field screening results, which did not indicate the presence of VOCs, unsaturated soil samples were collected from both soil borings SSB-5 and SSB-6 at the 15 to 15.5-foot sampling interval, and were submitted for laboratory analysis, in accordance with the methods described in Section 4.1.1

Groundwater

To document groundwater conditions in the area west of the storm drain, a one-inch temporary groundwater monitoring well was installed in the open borehole of soil boring SSB-5, and designated as temporary monitoring well TMW-5. Temporary monitoring well TMW-5 was constructed utilizing a one-inch diameter PVC riser fitted with 10 feet of PVC slotted well screen. A graded sand filter pack was placed around the screen to mitigate the potential influx of fine-grained sediments into the temporary well. Upon completion, temporary monitoring well TMW-5 was developed to remove fine-grained sediments from the well screen.

A groundwater sample from temporary monitoring well TMW-5 was collected in conformance with the following protocol:

- Prior to sample collection, the static groundwater depth was measured in temporary monitoring well TMW-5 and in the six other existing groundwater monitoring wells identified in Section 2.3;
- Three well volumes were purged from temporary monitoring well TMW-5;

- During purging, groundwater quality parameters (temperature, pH, and conductivity), were recorded for each well volume to ensure that a representative groundwater sample was collected;
- Following purging, a groundwater sample was collected from temporary monitoring well TMW-5 using a disposable polyethylene bailer. In addition, a blind duplicate, a matrix spike (MS), and a matrix spike duplicate (MSD) were also collected from temporary monitoring well TMW-5 for QA/QC purposes; and
- The samples were immediately placed into an appropriately prepared and labeled sample containers provided by the laboratory, and secured on ice in an insulated transport cooler for delivery to the laboratory.

Laboratory Analysis & Quality Assurance/Quality Control

As stated above, QA/QC samples consisting of a blind duplicate, MS, and MS/MSDs were collected during the closure activities to ensure suitable and verifiable data results from the sampling and analysis of the groundwater sample, as per DER-10. Additionally, one trip blank, was provided by the laboratory, and submitted for analysis.

Soil, groundwater, and QA/QC samples were submitted under chain of custody to STL, a NYSDOH, ELAP, and CLP-certified laboratory for analysis of the following parameters:

- VOCs in accordance with USEPA Method 8260 plus TICs; and
- SVOCs in accordance with USEPA Method 8270 plus TICs.

Synapse notified STL in advance of the requirement to provide Category B laboratory data deliverables. Additionally, a Data Usability Summary Report is provided for NYSDEC's review and determination of completeness in Appendix C.

4.2.1 Soil Sample Analytical Results

Two soil boring samples, SSB-5 and SSB-6, were collected west of the storm drain for analyses of VOCs, plus TICs and SVOCs, plus TICs. The analytical results are presented in Table 1 and summarized as follows:

- With the exception of two parameters, laboratory analytical results of the two soil samples west of the storm drain (SSB-5 and SSB-6) did not identify concentrations of VOCs, SVOCs or respective TICs above NYSDEC RSCOs.
- Analytical results of these two soil samples indicated the presence of one VOC at a concentration that exceed the NYSDEC RSCO.
    - Methylene chloride was detected at an estimated concentration of 4 mg/kg in soil samples SSB-5 and SSB-6.
- One SVOC, phenol, was detected at estimated concentrations of 0.072 and 0.038 mg/kg in soil samples SSB-5 and SSB-6, respectively. However, phenol was also identified in the method blank as well as the soil samples and therefore may be an indication of laboratory contamination.

4.2.2 Groundwater Analytical Results

One VOC, cis-1,2-dichloroethene (cis-1,2-DCE) was detected at a concentration 32 and 33 micrograms per liter (ug/l) in the primary sample and its blind duplicate sample collected from temporary monitoring well TMW-5, respectively. The cis-1,2-DCE respective groundwater quality standard is 5 ug/l as established in NYSDEC's June 1998 NYSDEC Ambient Water Quality and Guidance Values and Groundwater Effluent Limitations – Division of Water Technical and Operational Guidance Series memorandum 1.1.1 (TOGS 1.1.1).

One SVOC, dibenzofuran was detected at a concentration of 15 ug/l and an estimated concentration of 6 ug/l respectively, in the primary sample and the blind duplicate sample collected from temporary monitoring well TMW-5. Dibenzofuran's respective groundwater quality standard is 5 ug/l. Eleven SVOCs were detected at estimated concentrations above their respective MDLs; however, did not exceed the groundwater quality standards. Data for all analyzed compounds are summarized in Table 2 – Groundwater Analytical Results and Appendix C.

4.3 Storm Drain Corrective Action

The Storm Drain Corrective Action discussed in the following sections represents the final corrective action required to obtain closure of the VCA. Based on the previous inspections of the storm drain and discussion with NYSDEC an alternative storm drain corrective action was implemented that included pressure washing as opposed to the mechanical cleaning as set forth in the VCA Workplan. This alternative corrective action was verbally approved by NYSDEC on April 25, 2005. The storm drain interior was cleaned utilizing a high pressure, moderate flow washing device to force sediment from up-stream manhole MH-2 to down-stream manhole MH-1 depicted on Figure 4.

4.3.1 Interior Storm Drain Cleaning

The storm drain interior cleaning was conducted by on June 2nd and 3rd, 2005 Synapse procured LVI Services Inc. (LVI) of Rochester, New York to coordinate the cleaning and management of the wash water and sediment. LVI subcontracted the cleaning, camera, and manual inspection to National Vacuum Corporation (NVC). Additionally, LVI subcontracted the waste management of the wash water and sediment to Environmental Products and Services (EP&S) of Syracuse, New York. Prior to conducting any activities at the Rod Mill Parcel Synapse obtained a Canal permit from the New York State Canal Corporation in the event that cleaning activities encroached on the canal right-of-way or the canal, of which they did not.

On June 2nd NVC entered manhole MH-1 and installed an inflatable plug in the upstream end of manhole MH-1 to prevent wash water from flowing to the canal. Additionally, LVI installed absorbent booms at the Barge Canal outlet as a precaution in the event that any wash water passed the plug. During the cleaning activities no wash water passed the plug based on visual inspections conducted by Synapse. Approximately, 9,747 gallons of non-hazardous wash water and 700 gallons of non-hazardous sediment and debris were generated , collected and disposed of off-site during the storm drain cleaning. The wash water and sediment was transported to EP&S facilities in Syracuse and Albany, New York. A copy of the disposal receipts will be transmitted to the NYSDEC under separate cover.

The following details the interior storm drain cleaning activities conducted on June 2nd and June 3rd 2005:

June 2nd 2005

- NVC set up at manhole MH-1 with a Guzzler wet/dry vacuum truck with a 3,000 gallon capacity;
- NVC advanced a high pressure ram rodder sewer flusher with a flow rate of 80 gallons per minute (gpm) at 2500 pounds per square inch (psi) rating;
- NVC initially advanced the sewer flusher approximately 60 feet upstream from manhole MH-1. The wash water and sediment were vacuumed from manhole MH-1 and transferred to an onsite EP&S tanker with a 5,500 gallon capacity;
- On a third attempt NVC advanced the sewer flusher approximately 93 feet upstream from manhole MH-1. Wash water and sediment was collected and transferred to the onsite EP&S tanker;
- NVC relocated to manhole MH-2 and advanced the sewer flusher approximately 73 feet downstream of manhole MH-2. Wash water and sediment was collected and transferred to the onsite EP&S tanker;
- NVC installed a remote pipe crawler into manhole MH-2 to video document and inspect the cleaning activities that identified the bottom of the 36-inch diameter was nonexistent in certain areas from manhole MH-2 downstream;
- NVC relocated to manhole MH-1 and installed a remote pipe crawler to video document and inspect the results of the cleaning activities. The remote pipe crawler advanced approximately 15 feet upstream from manhole MH-1, further advancement was not possible due to 6 to 8 inches of sediment consisting of sands and gravel; and
- Synapse and NVC discussed an alternative cleaning approach consisting of bucket drag winch to mechanically remove 25 to 30 feet of sediment.

June 3rd 2005

- NVC set up at manhole MH-1 and advanced the sewer flusher approximately 60 feet upstream. NVC set up at MH-2 for confined space entry to attach a rope to the end of the sewer flusher in order to winch it the additional 110 feet to manhole MH-2;
- A NVC employee donned level B personal protective equipment (PPE) and entered manhole MH-2 to advance downstream to the sewer flusher. During the downstream advancement, at approximately 40 feet, the NVC employee visually identified a section of the storm drain of which the bottom of the 36 inch pipe was nonexistent;
- The visual inspection of the 40 feet of pipe downstream of manhole MH-2 by NVC indicated there was no visually impacted debris or sediment;
- Based on the finding of the visual inspection mechanical clean was not possible as the bucket drag winch system would not pass the voids identified in the pipe. Synapse directed NVC to return to manhole MH-1 and focus on removing the sediment via the sewer flusher;

- NVC resumed the cleaning activities utilizing the sewer flusher to force the sediment and wash water to manhole MH-1, NVC collected an additional 3,000 gallons of wash water and sediment and transfer it to an onsite EP&S tanker;
- Following the cleaning activity NVC advanced a remote pipe crawler from manhole MH-1 upstream. The camera revealed approximately 3 to 4 inches of light brown sand and gravel for approximately 15 to 20 feet. The camera inspection revealed that the bottom of the pipe was nonexistent in sections from 35 to 56 feet upstream from manhole MH-1. This nonexistent pipe bottom would account for the sand and gravel that was observed during the cleaning activities as the sewer flusher was undermining the native soils below the pipe;
- After camera verification was completed, documenting the cleaning activities, the inflatable plug was removed and as precautionary preventive measure absorbent booms were placed in manhole MH-1 and at the outfall to the barge canal; and
- The measures will be inspected after rain events greater than ½ inch.

4.3.2 Inspection and Assessment

Following the pipe cleaning program, the interior of the 36-inch storm drain was inspected for structural integrity and staining. The effectiveness of the pipe cleaning program, as measured through follow-up inspection and assessment is summarized as follows:

- The final camera inspection indicated that the pipe cleaning was effective in removing the oily residue and sediment observed during the November 3rd 2004 camera inspection. Additionally, the final camera inspection provide further detail on the poor structural integrity of the pipe;
- As a precautionary measure, absorbent booms were placed at the effluent of manhole MH-1 and the Barge Canal outlet; and
- Following the pending transfer of the Property to the City of Rome, the storm drain downstream from manhole MH-2 is intended to be decommissioned by the City.

4.3.3 Conclusions

Based on the inspection, reviews and recently completed cleaning as described herein, the sheen observed at the Barge Canal outfall (Spill No. 02-12777) can be attributed to the oily sediment and debris from inside the storm drain itself between manhole MH-1 to a distance of approximately 60 feet upstream and not related to any residual petroleum hydrocarbons associated with the 2003 RA AST or the former Pump House.

5.0 INSTITUTIONAL AND ENGINEERING CONTROLS

As set forth in the VCA, institutional and engineering controls will be established at the Property. The intent of the controls is to minimize exposure by identifying the Property use as commercial or industrial. The future use of the Property is incorporation in to the City of Rome's Community Recreational Center. A conceptual drawing of the Community Recreational Center is provided in Appendix A.

Institutional Controls

The institutional controls shall include recording a Deed Restriction that shall prohibit:

- The Property from being used for purposes other than commercial or industrial without the express written waver of such prohibition by NYSDEC; and
- The use of groundwater underlying the Property unless the user first obtains permission to do so from NYSDEC.

Engineering Controls – Cover System

The engineering controls shall include the establishment and maintenance of a surface cover system that provides a physical barrier to soil, thereby minimizing potential exposure pathways. Additionally, the proposed redevelopment plans include the placement of a six inch soil layer over the Property that will be hydro-seeded and covered with mulch. The management plan for soils and the maintenance of the cover system will be set forth in a Soils Management Plan.

5.1 Deed Restriction

Within 30 days of receipt of NYSDEC's written approval of this VCA Closure Report, an instrument will be recorded with the Oneida County Clerk, to run with the land. A copy of the recorded Deed Restriction will be provided to NYSDEC under separate cover.

5.2 Cover System

The Property currently has a cover system consisting of concrete and asphalt with a thickness of 6 inches or greater encompassing approximately 95% of the Property. An unpaved cover system is located in the southeast corner of the Property in the vicinity of the former AST remediation area. This area currently maintains a clean soil cover greater than 6 inches that is predominantly vegetated. Upon transfer of the Property to the City of Rome and as part of the redevelopment project, the overall Property will undergo areas of regrading to facilitate redevelopment, the areas will be filled with additional clean material and graded to facilitate runoff and reduce infiltration. The Soils Management Plan will address these activities and adherence to the plan will ensure the cover system, in its various forms, will be maintained.

5.3 Soils Management Plan

The Soils Management Plan has been developed and will be provided to NYSDEC under separate cover. The objective of the Soils Management Plan is to set guidelines for management of soil during any future activities which would breach the current cover system at the Property and provide for establishing modified cover systems in accordance with the redevelopment plans. The Soils Management Plan will discuss the following:

- Nature and extent of remaining in-place soils subject to management;
- Contemplated site usage;
- Purpose and description of the current surface cover system; and
- Long term maintenance and management of the soil, fill, asphalt and concrete cover systems at the Property.

6.0 SUMMARY

The following provides a summary of the information and data provided in this VCA Closure Report relating to the requirements for final closure of the VCA (Index No. D6-0001-97-07) and, simultaneously, the two petroleum spill files (Nos. 02-12777 & 02-12778) at the Property.

6.1 2003 AST RA

The laboratory analytical data of the four sidewall soil samples (SSB-1, SSB-2, SSB-3 and SSB-4) did not identify concentrations of VOCs, SVOCs or respective TICs above NYSDEC RSCOs, with the following clarifications:

- Analytical results of two soil samples SSB-2 and SSB-4 collected from the 2003 AST RA east and west sidewalls, respectively indicated the presence of two VOCs at concentrations that exceed the NYSDEC RSCOs.
    - Methylene chloride was detected at an estimated concentration of 4 mg/kg in soil sample SSB-2. The methylene chloride RSCO is 0.1 mg/kg. Methylene chloride is a common laboratory contaminant; and
    - Acetone was detected at a concentration of 25 mg/kg in soil sample SSB-4. The acetone RSCO is 0.2 mg/kg. Acetone is a common laboratory contaminant.
- One SVOC, phenol, was detected in the four sidewall one blind duplicate QA/QC sample at estimated concentrations ranging from 0.045 to 0.120 mg/kg, which exceeds the phenol RSCO of 0.03 mg/kg. Phenol was also identified in the method blank as well as the soil samples and therefore may be an indication of laboratory contamination.
- Field screening, including visual and olfactory observations conducted, during the advancement of these soil borings, did not indicate any evidence of gross contamination.

6.2 ORIGINALLY PROPOSED EXCAVATION AREA - FORMER PUMP HOUSE AREA

Soil

Laboratory analytical data of the two soil samples west of the storm drain (SSB-5 and SSB-6) did not identify concentrations of VOCs, SVOCs or respective TICs above NYSDEC RSCOs with the following clarifications.

- The presence of one VOC at a concentration that exceed the NYSDEC RSCO.
    - Methylene chloride was detected at an estimated concentration of 4 mg/kg in soil samples SSB-5 and SSB-6. Methylene chloride is a common laboratory contaminant.
- One SVOC, phenol, was detected at estimated concentrations of 0.072 and 0.038 mg/kg in soil samples SSB-5 and SSB-6, respectively. Phenol was also identified in the method blank as well as the soil samples and therefore may be an indication of laboratory contamination.
- Field screening, including visual and olfactory observations conducted, during the advancement of these soil borings did not indicate any evidence of gross contamination.

Groundwater

Laboratory analytical data of the groundwater samples collected from TMW-5 identified one VOC, one SVOC and no respective TICs above NYSDEC RSCOs.

- One VOC, cis-1,2-DCE, was detected at a concentration 32 and 33 ug/l respectively, in the primary sample and its blind duplicate sample collected from temporary monitoring well TMW-5.
- One SVOC, dibenzofuran, was detected at a concentration of 15 ug/l and an estimated concentration of 6 ug/l respectively, in the primary sample and the blind duplicate sample collected from temporary monitoring well TMW-5.
- No sheen or odor was noted in the groundwater samples collected.

Storm Drain Corrective Action

- The section of storm drain from Manhole MH-2 to MH-1 was cleaned with high pressure ram rodder sewer flusher.
- Approximately 9,800 gallons of wash water was generated, collected and transported off-site for disposal during the cleaning activities.
- Approximately 700 gallons of sediment, sludge and debris were collected and transported off-site for disposal during the cleaning activities.
- Post cleaning visual inspections confirmed the cleaning activities were successful in cleaning the pipe's interior walls and removal of oily residual debris and material.
- The visual inspection also identified that the bottom section of the storm drain between Manhole MH-1 and Manhole MH-2 had deteriorated, therefore allowing the influx of native soils during the cleaning activities.
- Upon transfer of the Property to the City of Rome and as part of the redevelopment project, the city will likely decommission the storm drain downstream of Manhole MH-2.

7.0 CONCLUSIONS

This VCA Closure Report concludes the following:

7.1 2003 AST RA

- Laboratory analytical results and field screening of the four sidewall soil samples adequately documented that the 2003 AST RA (Spill No. 02-12778) was successful in removing the petroleum impacted material and that no grossly impacted soil conditions remain.
- No further action associated with the 2003 AST RA on the Property is warranted.

7.2 ORIGINALLY PROPOSED EXCAVATION AREA - FORMER PUMP HOUSE AREA

- Laboratory analytical results and field screening of soil and groundwater samples collected from this area of the Property document that no grossly impacted soil or groundwater conditions are present west of the storm drain in the area of the Property that was originally believed to support the former pump house.
- No further action associated with this portion of the Property is warranted.

7.3 STORM DRAIN CORRECTIVE ACTION

- The storm drain corrective action was successful in removing the oily sediment and debris from the storm drain and cleaning the pipe's interior walls.
- Based on the inspection, reviews and recently completed cleaning as described herein, the sheen observed at the Barge Canal outlet (Spill No. 02-12777) can be attributed to the oily sediment and debris from inside the storm drain itself between manhole MH-1 to a distance of approximately 60 feet upstream and not related to residual petroleum hydrocarbons associated with the 2003 RA AST or the potential location of the former pump house.

Given the successful completion of remedial actions conducted to fulfill the VCA, and the analytical results, field observations and storm drain corrective action described in this report, NYSDEC has stated, upon approval of this report, that it will close the two spill files and the VCA for the Property.

8.0 RECOMMENDATIONS – COMPLETION STEPS

Based on the information and data provided in this report and previously submitted to NYSDEC, the following recommendations are provided:

- Copies of this report will be transmitted to NYSDEC along with a formal request to close the VCA (Index No. D6-0001-97-07) and, simultaneously, the two petroleum spill files (Nos. 02-12777 & 02-12778) at the Property;

9.0 REFERENCES

Clough Harbour Sports (September 10, 2004). *General Cable Site Plan (Full Build-Out Option), Rome, New York.*

Chas. T. Main, Inc. (1943-1945). For General Cable Corporation, *Utilities Surveys.*

Jack Eisenbach Engineering, P.C. (July 18, 2000). *Northern Redevelopment Area Closure Report.*

Jack Eisenbach Engineering, P.C. (April 26, 2001). *Rod Mill Parcel Environmental Remediation Closure Report.*

Jack Eisenbach Engineering, P.C. (May 30, 2003). *Rod Mill Parcel, Remedial Action Closure Report (Amendment to Environmental Remediation Closure Report April 26, 2001).*

Jack Eisenbach Engineering, P.C. (October 29, 2003). *General Cable Site, Rod Mill Parcel, Supplemental Spill Investigation Work Plan, Revision #1.*

New York State Department of Environmental Conservation (January 24, 1994). *Division Technical and Administrative Guidance Memorandum: Determination of Soil Cleanup Objectives and Cleanup Levels, HWR-94-4046.*

New York State Department of Environmental Conservation (March 8, 1999). *Consent Order, Index Number D6-0001-97-07.*

New York State Department of Environmental Conservation (January 21, 1998). *Old General Cable Site Road Right-Of-Way, City of Rome, Oneida County New York, Record of Decision.*

New York State Department of Environmental Conservation (December, 2002). Division of Environmental Remediation, *Draft DER-10, Technical Guidance for Site Investigation and Remediation.*

New York State Department of Environmental Conservation (April 12, 2004). Letter to Jack Eisenbach Engineering, P.C.

New York State Department of Environmental Conservation (January, 2005). Spills Incident Database Search for Spill Nos. 0212777 and 0212778, Retrieved January 17, 2005, from http://www.dec.state.ny.us/apps/derfoil/index.cfm?pageid=2

New York State Geographic Information System Database Clearinghouse (2003). Aerial Photograph.

Remediation Technologies, Inc. (July, 1997). *Phase II Investigation of the East Rome Business Park Core Area, Rome, New York.*

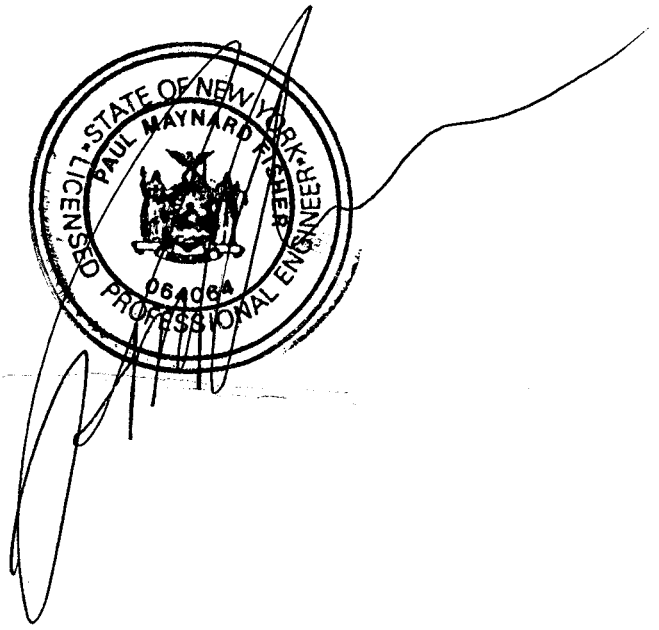
Synapse Risk Management, LLC. (January 2005). *Voluntary Cleanup Agreement Closure Workplan – Rod Mill Parcel, Old General Cable Site, Rome, New York.*

CERTIFICATION

I, Paul M. Fisher, P.E., as a licensed Professional Engineer in the State of New York, certify that the Voluntary Cleanup Agreement Closure Work Plan for the Rod Mill Parcel at the Old General Cable Site in Rome, New York, pursuant to the New York State Department of Environmental Conservation Draft DER-10, December 2002, Section 1.5(a), has been prepared in accordance with good engineering practices.

SYNAPSE ENGINEERING, PLLC

PAUL M. FISHER, P.E.



TABLES

VCA Closure Report
Rod Mill Parcel
Old General Cable Site
Rome, New York

August 2005

TABLE 1
Soil Analytical Results
Volatile Organic Compounds

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Sample Designation	NYSDEC RSCO (mg/kg)	22305	SSB-1	SSB-2	SSB-3	SSB-4	SSB-5	SSB-6
Sample Depth		11' - 12'	11' - 12'	7.5' - 8'	11 - 11.5'	7.5 - 8'	15' - 15.5'	15' - 15.5'
Units		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Volatile Organic Compounds								
Ethylbenzene	5.5	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Styrene	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
cis-1,3-Dichloropropene	NS	0.072 U	0.072 U	0.072 U	0.072 U	0.072 U	0.072 U	0.072 U
trans-1,3-Dichloropropene	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,4-Dichlorobenzene	8.5	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,2-Dibromoethane	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,2-Dichloroethane	0.1	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4-Methyl-2-pentanone	1	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Methylcyclohexane	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Toluene	1.5	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Chlorobenzene	1.7	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cyclohexane	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,2,4-Trichlorobenzene	3.4	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Dibromochloromethane	N/A	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Tetrachloroethene	1.4	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Total Xylenes	1.2	0.006 U	0.006 U	0.006 U	0.006 U	0.006 U	0.006 U	0.006 U
cis-1,2-Dichloroethene	0.3	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
trans-1,2-Dichloroethene	0.3	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Methyl tert butyl ether	10	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,3-Dichlorobenzene	1.6	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Carbon Tetrachloride	0.6	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2-Hexanone	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Acetone	0.2	0.006 U	0.006 U	0.006 U	0.006 U	**25**	0.006 U	0.006 U
Chloroform	0.3	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Benzene	0.06	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,1,1-Trichloroethane	0.8	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Bromomethane	NS	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
Chloromethane	NS	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
Chloroethane	1.9	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Vinyl chloride	0.2	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Methylene chloride	0.1	0.004 U	0.004 U	**4 J**	0.004 U	0.004 U	**4 J**	**4 J**
Carbon Disulfide	2.7	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
Bromoform	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Bromodichloromethane	NS	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U
1,1-Dichloroethane	0.2	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,1-Dichloroethene	0.4	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Trichlorofluoromethane	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Dichlorodifluoromethane	N/A	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,1,2-Trichloro-1,2,2-trifluoroethane	6	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,2-Dichloropropane	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2-Butanone	0.3	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
1,1,2-Trichloroethane	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Trichloroethene	0.7	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Methyl acetate	NS	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
1,1,2,2-Tetrachloroethane	0.6	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,2-Dichlorobenzene	7.9	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
1,2-Dibromo-3-chloropropane	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Isopropylbenzene	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
TICs*	10	0.229 J	0.118 J	0.01 BNJ	0.014 BNJ	0.142 J	0.012 BJN	0.129 J

Notes:

1. *As per TAGM 4046 individual and the sum of VOCs (including Tentatively Identified Compounds (TICs)) <10 ppm.
2. ** As per TAGM 4046 individual non-carcinogenic semivolatiles <50 ppm & total SVOCs (including TICs) <500 ppm. in the sample.
3. NYSDEC RSCO = New York State Department of Environmental Conservation (NYSDEC) Recommend Soil Cleanup Objective presented in Technical and Administrative Guidance Memorandum (TAGM) # 4046.
4. All values presented in milligrams/kilogram (mg/kg), approximately equivalent to parts per million (ppm).
5. J = Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where 1:1 response is assumed.
6. B = This flag is used where the analyte is found in the associated blank, as well as in the sample.
7. N = Indicates presumptive evidence of a compound. The flag is used only for TICs, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
8. U = Indicates compound was analyzed for, but not detected at or above the reporting limit.
9. NS = No standard or guidance value.

TABLE 1 (Con't)
Soil Analytical Results
Semi-volatile Organic Compounds

VCA Index No. D6-0001-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Sample Designation	NYSDEC RSCO (mg/kg)	22305	SSB-1	SSB-2	SSB-3	SSB-4	SSB-5	SSB-6
Sample Depth		11' - 12'	11' - 12'	7.5' - 8'	11 - 11.5'	7.5 - 8'	15' - 15.5'	15' - 15.5'
Units		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Semi-volatile Organic Compounds								
4-Nitroaniline	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4-Nitrophenol	0.1 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Benzaldehyde	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
4-Bromophenyl phenyl ether	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Caprolactam	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
2,4-Dimethylphenol	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
4-Methylphenol	0.9	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4-Chloroaniline	0.22 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2,2'-Oxybis(1-Chloropropane)	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Phenol	0.03 or MDL	**0.120 BJ**	**0.051 BJ**	**0.047 BJ**	**0.045 BJ**	**0.048 BJ**	**0.072 BJ**	**0.038 J**
Bis(2-chloroethyl) ether	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Bis(2-chloroethoxy) methane	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Bis(2-ethylhexyl) phthalate	50	0.120 BJ	0.092 BJ	0.250 U	0.047 BJ	0.230 BJ	0.067 BJ	0.002 U
Di-n-octyl phthalate	50	0.012 J	17 J	0.018 J	0.012 J	0.014 J	0.002 U	0.002 U
Hexachlorobenzene	0.41	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Anthracene	50	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
2,4-Dichlorophenol	0.4	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
2,4-Dinitrotoluene	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Pyrene	50	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Dimethyl phthalate	2	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Dibenzofuran	6.2	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Benzo(ghi)perylene	50	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Atrazine	NS	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U
Indeno(1,2,3-cd)pyrene	3.2	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Benzo(b)fluoranthene	1.1	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Fluoranthene	50	0.004 U	0.004 U	0.013 J	0.030 J	0.019 J	0.004 U	0.004 U
Benzo(k)fluoranthene	1.1	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Acenaphthylene	41	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Chrysene	0.4	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Benzo(a)pyrene	0.061 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2,4-Dinitrophenol	0.2 or MDL	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
Dibenzo(a,h)anthracene	0.014 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4,6-Dinitro-2-methylphenol	NS	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
Benzo(a)anthracene	0.224 or MDL	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
4-Chloro-3-methylphenol	0.24 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2,6-Dinitrotoluene	1	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
N-Nitroso-Di-n-propylamine	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Hexachloroethane	NS	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
4-Chlorophenyl phenyl ether	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Hexachlorocyclopentadiene	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Isophorone	4.4	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Acenaphthene	50	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Diethyl phthalate	7.1	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Di-n-butyl phthalate	8.1	0.026 J	0.024 J	0.078 J	0.011 J	0.021 J	0.011 J	0.038 BJ
Phenanthrene	50	0.012 J	0.011 J	0.016 J	0.014 J	0.170 J	0.003 U	0.011 J
Butyl benzyl phthalate	50	0.003 U	0.012 J	0.003 U	0.003 U	0.014 J	0.003 U	0.003 U
N-nitrosodiphenylamine	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
Fluorene	50	0.002 U	0.002 U	0.002 U	0.002 U	0.085 J	0.002 U	0.002 U
Carbazole	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Hexachlorobutadiene	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Pentachlorophenol	1	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
2,4,6-Trichlorophenol	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2-Nitroaniline	0.43 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2-Nitrophenol	0.330 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Naphthalene	13	0.015 J	0.018 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2-Methylnaphthalene	36.4	0.170 J	0.220 BJ	0.013 J	0.001 U	0.001 U	0.001 U	0.014 J
2-Chloronaphthalene	NS	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
3,3'-Dichlorobenzidine	NS	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Biphenyl	NS	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U
2-Methylphenol	0.10 or MDL	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
2-Chlorophenol	0.8	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
2,4,5-Trichlorophenol	0.1	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Acetophenone	NS	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U	0.330 U
Nitrobenzene	0.20 or MDL	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U	0.003 U
3-Nitroaniline	0.50 or MDL	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
TICs**	NS	8.47 J	8.12 J	8.83 J	7.89 J	25.2 J	5.3 J	5.05 J

Notes:

1. *As per TAGM 4046 individual and the sum of VOCs (including Tentatively Identified Compounds (TICs)) <10 ppm.
2. ** As per TAGM 4046 individual non-carcinogenic semivolatiles <50 ppm & total SVOCs (including TICs) <500 ppm. in the sample.
3. NYSDEC RSCO = New York State Department of Environmental Conservation (NYSDEC) Recommend Soil Cleanup Objective presented in Technical and Administrative Guidance Memorandum (TAGM) # 4046.
4. All values presented in milligrams/kilogram (mg/kg), approximately equivalent to parts per million (ppm).
5. J = Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where 1:1 response is assumed.
6. B = This flag is used when the analyte is found in the associated blank, as well as in the sample.
7. N = Indicates presumptive evidence of a compound. The flag is used only for TICs, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
8. U = Indicates compound was analyzed for, but not detected at or above the reporting limit.
9. NS = No standard or guidance value.

TABLE 2
Groundwater Analytical Results
Volitile Organic Compounds

VCA Index No. D6-0001-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Sample Designation	NYSDEC	TWM-5	22305W
Sample Date	Groundwater	2/23/2005	2/23/2005
Units	Standard (ug/l)	ug/l	ug/l
Volatile Organic Compounds			
Ethylbenzene	5	2.04 U	2.04 U
Styrene	NS	2.07 U	2.07 U
cis-1,3-Dichloropropene	NS	0.72 U	0.72 U
trans-1,3-Dichloropropene	NS	1.35 U	1.35 U
1,4-Dichlorobenzene	5	1.95 U	1.95 U
1,2-Dibromoethane	NS	2.13 U	2.13 U
1,2-Dichloroethane	5	1.44 U	1.44 U
4-Methyl-2-pentanone	50	1.89 U	1.89 U
Methylcyclohexane	NS	2.55 U	2.55 U
Toluene	5	1.99 U	1.99 U
Chlorobenzene	5	1.51 U	1.51 U
Cyclohexane	NS	2.24 U	2.24 U
1,2,4-Trichlorobenzene	5	2.63 U	2.63 U
Dibromochloromethane	NS	1.27 U	1.27 U
Tetrachloroethene	5	2.91 U	2.91 U
Total Xylenes	5	3.32 U	3.32 U
cis-1,2-Dichloroethene	5	**33**	**32**
trans-1,2-Dichloroethene	5	2.68 U	2.68 U
Methyl tert butyl ether	10	2.11 U	2.11 U
1,3-Dichlorobenzene	5	1.58 U	1.58 U
Carbon Tetrachloride	5	2.14 U	2.14 U
2-Hexanone	NS	2.89 U	2.89 U
Acetone	50	0.24 U	0.24 U
Chloroform	7	1.97 U	1.97 U
Benzene	0.7	1.54 U	1.54 U
1,1,1-Trichloroethane	5	1.72 U	1.72 U
Bromomethane	NS	5.77 U	5.77 U
Chloromethane	NS	4.20 U	4.20 U
Chloroethane	50	2.56 U	2.56 U
Vinyl chloride	2	3.49 U	3.49 U
Methylene chloride	5	3.94 U	3.94 U
Carbon Disulfide	50	4.39 U	4.39 U
Bromoform	NS	1.42 U	1.42 U
Bromodichloromethane	NS	0.76 U	0.76 U
1,1-Dichloroethane	5	2 J	2 J
1,1-Dichloroethene	5	2.37 U	2.37 U
Trichlorofluoromethane	NS	1.61 U	1.61 U
Dichlorodifluoromethane	NS	1.92 U	1.92 U
1,1,2-Trichloro-1,2,2-trifluoroethane	5	1.15 U	1.15 U
1,2-Dichloropropane	NS	1.05 U	1.05 U
2-Butanone	50	3.78 U	3.78 U
1,1,2-Trichloroethane	NS	1.78 U	1.78 U
Trichloroethene	5	1.96 U	1.96 U
Methyl acetate	NS	3.74 U	3.74 U
1,1,2,2-Tetrachloroethane	5	1.47 U	1.47 U
1,2-Dichlorobenzene	4.7	1.79 U	1.79 U
1,2-Dibromo-3-chloropropane	NS	2.64 U	2.64 U
Isopropylbenzene	NS	1.95 U	1.95 U
TICs	NS	161 J	177 J

Notes:

1. Groundwater standard, as per Technical & Operational Guidance Series (TOGS) 1.1.1.
2. NS = No standard or guidance value.
3. All values presented in micrograms/liter (ug/l), approximately equivalent to parts per billion (ppb).
4. J = Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where 1:1 response is assumed.
5. B = This flag is used where the analyte is found in the associated blank, as well as in the sample.
6. N = Indicates presumptive evidence of a compound. The flag is used only for TICs, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
7. U = Indicates compound was analyzed for, but not detected at or above the reporting limit.

Table 2 (Con't)
Groundwater Analytical Results
Semi-volatile Organic Compounds

VCA Index No. D6-0001-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Sample Designation	NYSDEC	TMW-5	22305W
Sample Date	Groundwater	2/23/2005	2/23/2005
Units	Standard (ug/l)	ug/l	ug/l
Semi-volatile Organic Compounds			
4-Nitroaniline	NS	0.38 U	0.38 U
4-Nitrophenol	5	0.39 U	0.39 U
Benzaldehyde	NS	0.41 U	0.41 U
4-Bromophenyl phenyl ether	NS	0.47 U	0.47 U
Caprolactam	NS	5.1 U	5.1 U
2,4-Dimethylphenol	NS	0.43 U	0.43 U
4-Methylphenol	50	0.78 U	0.78 U
4-Chloroaniline	5	0.25 U	0.25 U
2,2'-Oxybis(1-Chloropropane)	NS	0.36 U	0.36 U
Phenol	1	0.38 U	0.38 U
Bis(2-chloroethyl) ether	NS	0.31 U	0.31 U
Bis(2-chloroethoxy) methane	NS	0.27 U	0.27 U
Bis(2-ethylhexyl) phthalate	50	1 BJ	4 BJ
Di-n-octyl phthalate	50	0.24 U	0.24 U
Hexachlorobenzene	0.35	0.47 U	0.47 U
Anthracene	50	6 J	0.64 U
2,4-Dichlorophenol	1	0.31 U	0.31 U
2,4-Dinitrotoluene	NS	0.31 U	0.31 U
Pyrene	50	1 J	4 J
Dimethyl phthalate	50	0.32 U	0.32 U
Dibenzofuran	5	**6 J**	**15**
Benzo(ghi)perylene	5	0.40 U	0.40 U
Atrazine	NS	0.58 U	0.58 U
Indeno(1,2,3-cd)pyrene	0.002	0.35 U	0.35 U
Benzo(b)fluoranthene	0.002	0.38 U	0.38 U
Fluoranthene	50	0.65 U	1 J
Benzo(k)fluoranthene	0.002	0.46 U	0.46 U
Acenaphthylene	20	0.43 U	0.43 U
Chrysene	0.002	0.46 U	0.6 J
Benzo(a)pyrene	0.002	0.27 U	0.27 U
2,4-Dinitrophenol	5	0.78 U	0.78 U
Dibenzo(a,h)anthracene	50	0.27 U	0.27 U
4,6-Dinitro-2-methylphenol	NS	0.79 U	0.79 U
Benzo(a)anthracene	0.002	0.56 U	0.56 U
4-Chloro-3-methylphenol	5	0.39 U	0.39 U
2,6-Dinitrotoluene	5	0.64 U	0.64 U
N-Nitroso-Di-n-propylamine	NS	0.43 U	0.43 U
Hexachloroethane	NS	0.60 U	0.60 U
4-Chlorophenyl phenyl ether	NS	0.35 U	0.35 U
Hexachlorocyclopentadiene	NS	0.27 U	0.27 U
Isophorone	50	0.44 U	0.44 U
Acenaphthene	20	5 J	14
Diethyl phthalate	50	0.49 U	0.49 U
Di-n-butyl phthalate	50	0.51 U	2 J
Phenanthrene	50	0.44 U	20
Butyl benzyl phthalate	50	0.49 U	0.49 U
N-nitrosodiphenylamine	NS	16	0.43 U
Fluorene	50	16	44
Carbazole	NS	0.37 U	0.37 U
Hexachlorobutadiene	NS	0.47 U	0.47 U
Pentachlorophenol	1	0.70 U	0.70 U
2,4,6-Trichlorophenol	NS	0.35 U	0.35 U
2-Nitroaniline	5	0.38 U	0.38 U
2-Nitrophenol	5	0.39 U	0.39 U
Naphthalene	10	0.36 U	0.36 U
2-Methylnaphthalene	50	4 J	0.22 U
2-Chloronaphthalene	NS	0.42 U	0.42 U
3,3'-Dichlorobenzidine	NS	0.31 U	0.31 U
Biphenyl	NS	0.29 U	0.29 U
2-Methylphenol	5	0.78 U	0.78 U
2-Chlorophenol	50	0.39 U	0.39 U
2,4,5-Trichlorophenol	1	0.33 U	0.33 U
Acetophenone	NS	0.35 U	0.35 U
Nitrobenzene	5	0.48 U	0.48 U
3-Nitroaniline	5	0.33 U	0.33 U
TICs	NS	1088 J	714 J

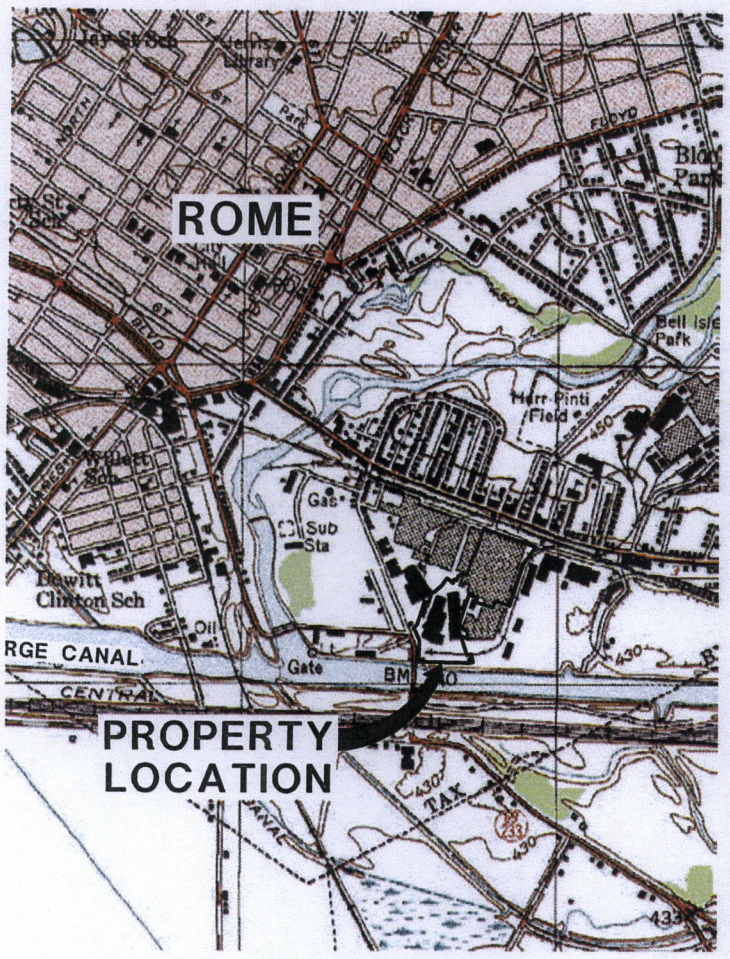
Notes:

1. Groundwater standard, as per Technical & Operational Guidance Series (TOGS) 1.1.1.
2. NS = No standard or guidance value.
3. All values presented in micrograms/liter (ug/l), approximately equivalent to parts per billion (ppb).
4. J = Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where 1:1 response is assumed.
5. B = This flag is used where the analyte is found in the associated blank, as well as in the sample.
6. N = Indicates presumptive evidence of a compound. The flag is used only for TICs, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
7. U = Indicates compound was analyzed for, but not detected at or above the reporting limit.

FIGURES

VCA Closure Report
Rod Mill Parcel
Old General Cable Site
Rome, New York

August 2005



LOCATION MAP
1" = 2000'

NOTES:

1. BASE MAP MODIFIED FROM ELECTRONIC COPY OF SURVEYS BY LAFAVE, WHITE, & MCGIVERN, L.S., P.C. ENTITLED "SUBDIVISION MAP PROPERTY OF EAST ROME BUSINESS PARK CHARLES A. GAETANO – OWNER", DATED 12/20/96.
2. AERIAL PHOTOGRAPH FROM NYS GIS DATA CLEARINGHOUSE, 2003.

0 150' 300'

GRAPHIC SCALE

LEGEND

PROPERTY LINE

APPROXIMATE ADJACENT PROPERTY LINE

PARCEL NO. 3 PARCEL IDENTIFICATION

P: BL
7/29/05
SYNAPSE/WIP/GAET 01-04/GAETB23.DWG

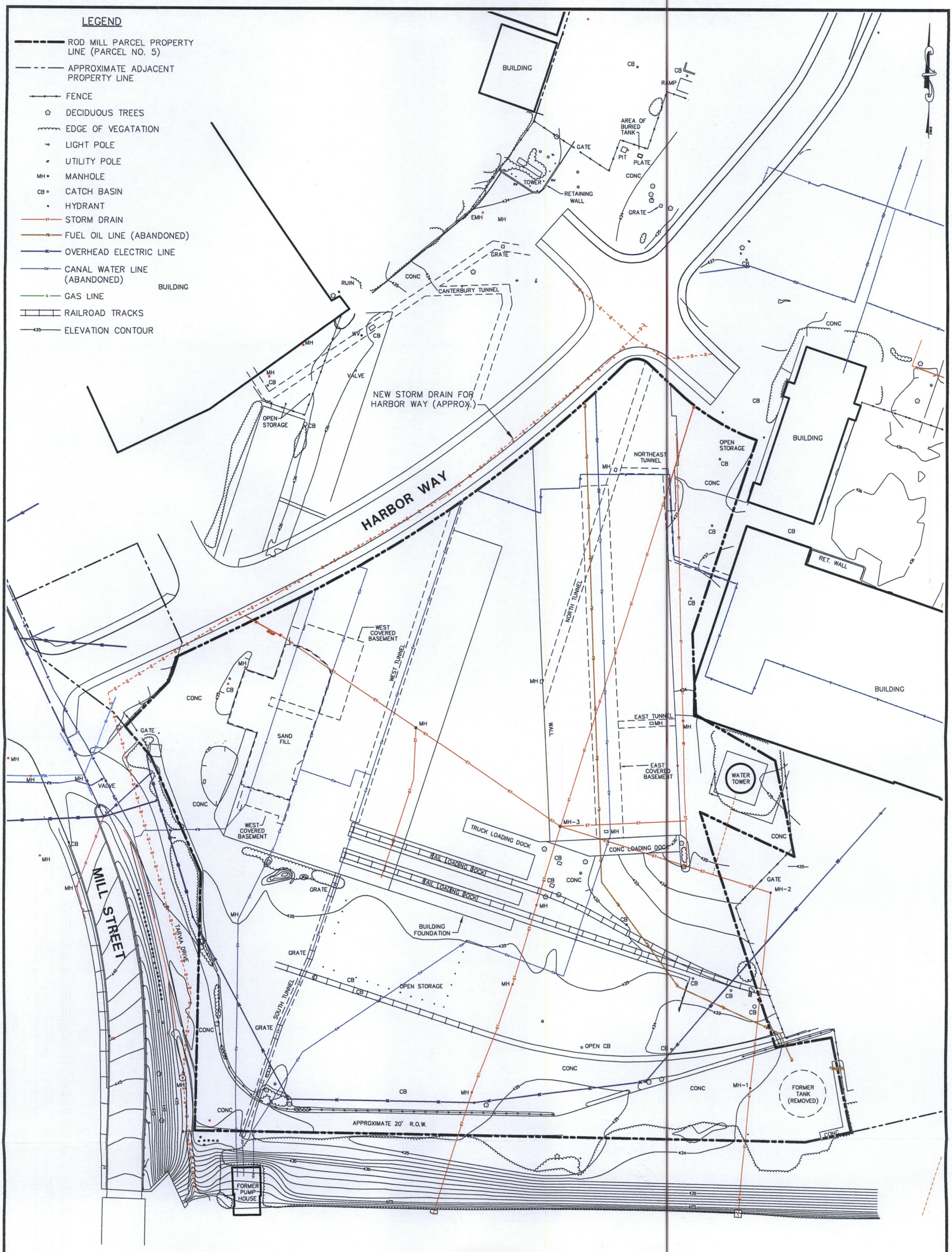
synapse

SYNAPSE ENGINEERING, PLLC
400 UNIVERSITY BUILDING
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202

VCA CLOSURE REPORT
ROD MILL PARCEL
OLD GENERAL CABLE SITE
ROME, NEW YORK

PROPERTY AERIAL MAP

PROJECT NO.: GAET 02-04-01
DATE: AUGUST 2005
FIGURE NO.: 1



NOTES:

1. BASE MAP MODIFIED FROM ELECTRONIC COPY OF SURVEYS BY LAFAVE, WHITE, & MCGIVERN, L.S., P.C. ENTITLED "SUBDIVISION MAP PROPERTY OF EAST ROME BUSINESS PARK CHARLES A. GAETANO – OWNER", DATED 12/20/96.
2. UTILITY LOCATIONS ARE APPROXIMATE, AND ALL UTILITIES MAY NOT BE SHOWN.

0 80' 160'

GRAPHIC SCALE

P: BL
7/29/05
SYNAPSE/WIP/GAET 01-04/GAETB24.DWG

synapse
SYNAPSE ENGINEERING, PLLC
400 UNIVERSITY BUILDING
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202

VCA CLOSURE REPORT
ROD MILL PARCEL
OLD GENERAL CABLE SITE
ROME, NEW YORK

ROD MILL PARCEL PLAN

PROJECT NO.: GAET 02-04-01
DATE: AUGUST 2005
FIGURE NO.: 2

TRUCK LOADING DOCK
RAIL LOADING DOCK
RAIL LOADING DOCK
GRATE
BUILDING FOUNDATION
MH-3
MH
CONC LOADING DOCK
CB
CB
CONC
MW-4S (423.63)
MH
CB
CONC
GATE
MH-2
36" STORM DRAIN
423.5
423.5
423.0
423.0
422.5
422.5
OPEN STORAGE
CB
CB
CB
CB
MH
MW-B-2 (422.25)
MW-2S (422.27)
B-9(MW-9) (422.18)
EXTENT OF ACTUAL REMEDIAL EXCAVATION
1.5"
4"
422.0
OPEN CB
CB
CONC
CB
MH
MH-1
FORMER TANK (REMOVED)
421.5
CONC
EXTENT OF ORIGINALLY PROPOSED EXCAVATION
APPROXIMATE 20' R.O.W.
B-8(MW-2) (420.74)
B-7(MW-7) (422.39)
CONC
421.0
422.0
421.5
421.0
420.5
420.5
OUTLET
EDGE OF WATER (420.35)
OUTLET

LEGEND

- ROD MILL PARCEL PROPERTY LINE (PARCEL NO. 5)
- APPROXIMATE ADJACENT PROPERTY LINE
- FENCE
- DECIDUOUS TREES
- EDGE OF VEGATATION
- LIGHT POLE
- UTILITY POLE
- MH MANHOLE
- CB CATCH BASIN
- HYDRANT
- OE OVERHEAD ELECTRIC LINE
- ST STORM DRAIN
- FO FUEL OIL LINE (ABANDONED)
- G GAS LINES
- RAILROAD TRACKS
- 435 ELEVATION CONTOUR
- MW-2S MONITORING WELL (1997 PHASE II ESA)
- B-2(MW-2) SOIL BORING (MONITORING WELL)
- (422.27) GROUNDWATER ELEVATION IN FEET (MEASURED 12/30/04)
- 422.0 GROUNDWATER ELEVATION CONTOUR LINE IN FEET

NOTES:

1. BASE MAP MODIFIED FROM ELECTRONIC COPY OF SURVEYS BY LAFAVE, WHITE, & MCGIVERN, L.S., P.C. ENTITLED "SUBDIVISION MAP PROPERTY OF EAST ROME BUSINESS PARK CHARLES A. GAETANO – OWNER", DATED 12/20/96.
2. UTILITY LOCATIONS ARE APPROXIMATE, AND ALL UTILITIES MAY NOT BE SHOWN.

0 40' 80'

GRAPHIC SCALE

BARGE CANAL

P: BL
7/29/05
SYNAPSE/WIP/GAET 01-04/GAETB25.DWG

synapse

SYNAPSE ENGINEERING, PLLC
400 UNIVERSITY BUILDING
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202

VCA CLOSURE REPORT
ROD MILL PARCEL
OLD GENERAL CABLE SITE
ROME, NEW YORK

GROUNDWATER CONTOUR MAP

PROJECT NO.: GAET 02-04-01
DATE: AUGUST 2005
FIGURE NO.: 3

TRUCK LOADING DOCK
RAIL LOADING DOCK
RAIL LOADING DOCK
MH-3
MH
CONC LOADING DOCK
CONC
GRATE
CB
CB
CONC
MH
BUILDING FOUNDATION
CB
435
434
433
432
435
GATE
MH-2
CONC
435
TE
CB
CB
OPEN STORAGE
MH
CB
CB
CB
36" STORM DRAIN
EXTENT OF STORM DRAIN CLEANING
EXTENT OF ACTUAL REMEDIAL EXCAVATION
B-9(MW-9)
SSB-1
1.5"
4"
SSB-5 (TMW-5)
WSW-12-20
MH-1
SSB-4
FORMER TANK (REMOVED)
SSB-6
WSW-8-19
SSB-2
B-2(MW-2)
SSB-3
B-7(MW-7)
CONC
OPEN CB
CB
CONC
CB
MH
435
EXTENT OF ORIGINALLY PROPOSED EXCAVATION
APPROXIMATE 20' R.O.W.
435
434
430
425
430
425
OUTLET
EDGE OF WATER
OUTLET

LEGEND

- ROD MILL PARCEL PROPERTY LINE (PARCEL NO. 5)
- APPROXIMATE ADJACENT PROPERTY LINE
- FENCE
- DECIDUOUS TREES
- EDGE OF VEGATATION
- LIGHT POLE
- UTILITY POLE
- MH — MANHOLE
- CB — CATCH BASIN
- HYDRANT
- OE — OVERHEAD ELECTRIC LINE
- ST — STORM DRAIN
- FO — FUEL OIL LINE (ABANDONED)
- G — GAS LINES
- RAILROAD TRACKS
- 435 — ELEVATION CONTOUR
- ⊕ B-2(MW-2) — PREVIOUS SOIL BORING (MONITORING WELL)
- △ WSW-8-19 — REMEDIAL ACTION SAMPLE LOCATION
- ▲ SSB-1 — CORRECTIVE ACTION SOIL BORING
- (TMW-5) — CORRECTIVE ACTION TEMPORARY MONITORING WELL

NOTES:

1. BASE MAP MODIFIED FROM ELECTRONIC COPY OF SURVEYS BY LAFAVE, WHITE, & MCGIVERN, L.S., P.C. ENTITLED "SUBDIVISION MAP PROPERTY OF EAST ROME BUSINESS PARK CHARLES A. GAETANO – OWNER", DATED 12/20/96.
2. UTILITY LOCATIONS ARE APPROXIMATE, AND ALL UTILITIES MAY NOT BE SHOWN.

0 40' 80'

GRAPHIC SCALE

BARGE CANAL

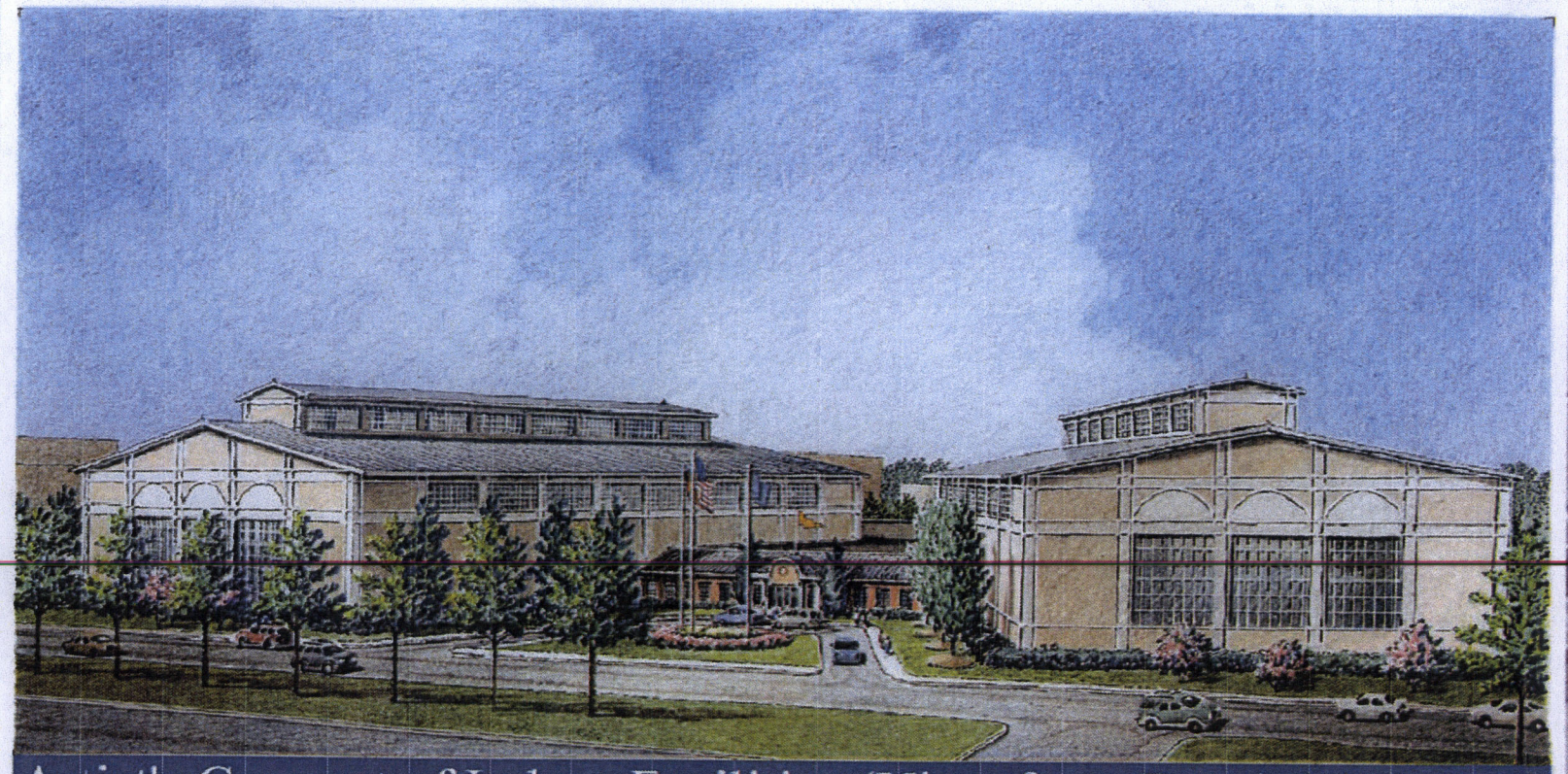
P: BL
7/28/05
SYNAPSE/WIP/GAET 01-04/GAETB26.DWG

synapse
SYNAPSE ENGINEERING, PLLC
400 UNIVERSITY BUILDING
120 EAST WASHINGTON STREET
SYRACUSE, NEW YORK 13202

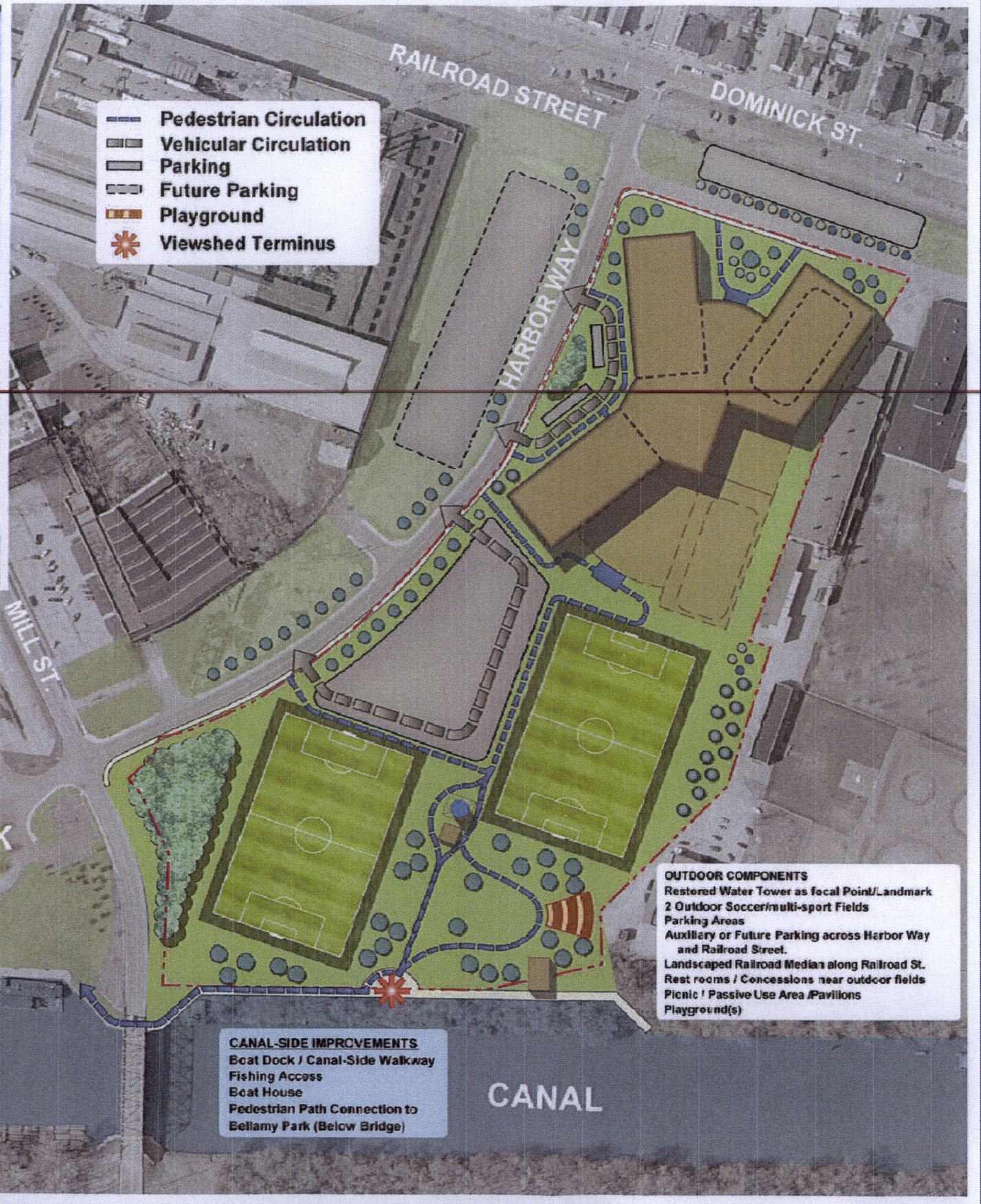
VCA CLOSURE REPORT
ROD MILL PARCEL
OLD GENERAL CABLE SITE
ROME, NEW YORK

AS-BUILT CORRECTIVE ACTION PLAN

PROJECT NO.: GAET 02-04-01
DATE: AUGUST 2005
FIGURE NO.: 4



Artist's Concept of Indoor Facilities (View from Dominick Street)



Rome Community Center
Massing Diagram (Full Build-Out Option)
Rome, New York

GRAPHIC SCALE
1 inch = 100 ft.

October 18, 2004

CLOUGH HARBOUR SPORTS

CHA

N

APPENDIX A
ROME COMMUNITY CENTER MASSING DIAGRAM (FULL BUILD-OUT DIAGRAM)

VCA Closure Report
Rod Mill Parcel
Old General Cable Site
Rome, New York

August 2005

APPENDIX B
SOIL BORING LOGS

VCA Closure Report
Rod Mill Parcel
Old General Cable Site
Rome, New York

August 2005

Boring Log - SSB-1

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Boring Log

Depth	Recovery	Description			Separate Phase Hydrocarbons			
(FT)	(IN)	Moisture	Color	Fraction	Odor	Visual	PID	Sample ID
1	30	Damp	gray-br	f-c Sand, some silt, concrete, tr red brick			0	
2							0	
3							0	
4							0	
5	32	Damp	Lt br	f-m SAND & SILT, tr clay			0	
6							0	
7							0	
8		Damp	Brown	CLAY, some silt			0	
9	44	Damp	Lt br	CLAY, tr silt			0	
10							0	
11							0	SSB-1
12							0	
13	36	Moist	Brown	CLAY, some silt	Slight Odor		0	
14		Wet	gray-br	GRAVEL, tr sand, tr silt			0	
15							0	
16		Wet	gray-br	Same as above			0	

Total Depth = 16 feet

Date: 2/23/05
North Excavation Limit

Boring Log - SSB-2

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New Yrok

Boring Log

Depth (FT)	Recovery (IN)	Description			Separate Phase Hydrocarbons			Sample ID
		Moisture	Color	Fraction	Odor	Visual	PID	
1	32	Damp	gray-br	f-c Sand, some silt, tr clay concrete, tr red brick			0	
2							0	
3							0	
4							0	
5	40	Damp	Brown	f-m SAND & SILT, tr clay			0	
6							0	
7							0	
8		Damp	Brown	CLAY, some silt			0	
9	44	Damp	Lt br	CLAY, tr silt			0	
10							0	
11							0	SSB-2
12		Wet	gray-br	m-c SAND, some gravel			0	
13	46	Moist	Brown	CLAY, some silt			0	
14		Wet	gray-br	GRAVEL, tr sand, tr silt			0	
15							0	
16		Wet	gray-br	Same as above	Slight Odor		0	

Total Depth = 16 feet

Date: 2/23/05
East Excavation Limit

Boring Log - SSB-3

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Boring Log

Depth	Recovery	Description			Separate Phase Hydrocarbons			
(FT)	(IN)	Moisture	Color	Fraction	Odor	Visual	PID	Sample ID
1	32	Damp	gray-br	f-c Sand, some silt, tr clay concrete, tr red brick			0	SSB-3
2							0	
3							0	
4							0	
5	40	Damp	Brown	f-m SAND & SILT, tr clay			0	
6							0	
7							0	
8		Damp	Brown	CLAY, some silt			0	
9	44	Damp	Lt br	CLAY, tr silt			0	
10							0	
11							0	
12		Wet	gray-br	m-c SAND, some gravel			0	
13	46						0	
14		Wet	gray-br	GRAVEL, tr sand, tr silt			0	
15							0	
16		Wet	gray-br	Same as above	Slight Odor		0	

Total Depth = 16 feet

Date: 2/23/05
South Excavation Limit

Boring Log - SSB-4

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 0212777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Boring Log

Depth	Recovery	Description			Separate Phase Hydrocarbons			
(FT)	(IN)	Moisture	Color	Fraction	Odor	Visual	PID	Sample ID
1	32	Damp	gray-br	Asphalt, f-m Sand, some silt, tr clay			0	SSB-4
2							0	
3							0	
4							0	
5	40	Damp	Lt br	f-m SAND & SILT, tr gravel			0	
6							0	
7							0	
8		Damp	Brown	CLAY, some silt			0	
9	44	Wet	Lt br	f-m SAND & SILT, tr gravel			0	
10							0	
11		Moist	Brown	CLAY, some silt			0	
12							0	
13	46	Wet	gray-br	GRAVEL, tr sand, tr silt	Slight Odor	Staining	0.9	
14							1.2	
15							1.3	
16		Wet	gray-br	Same as above	Slight Odor		4	
							4.3	
							4.2	
							5.2	
							6	

Total Depth = 16 feet

Date: 2/23/05
South (WSW-12-20)

Boring Log - SSB-5

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Boring Log

Depth	Recovery	Description			Separate Phase Hydrocarbons			
(FT)	(IN)	Moisture	Color	Fraction	Odor	Visual	PID	Sample ID
1				Concrete, spun 3 1/4 inch augers to 1-foot bgs.				
2	22	Damp	Brown	f-m SAND & SILT			0	
3							0	
4		Damp	Brown	f-c Sand, some silt			0	
5	44	Damp	Brown	f-m SAND & SILT			0	
6							0	
7							0	
8							0	
9	44	Damp	Brown	f-m SAND & SILT			0	
10							0	
11							0	
12							0	
13	36	Damp	Brown	f-c SAND, tr silt, tr gravel			0	
14		Moist	gray-br	GRAVEL, tr sand, tr silt			0	
15							0	SSB-5
16		Wet		Same as above			0	
17	36	Wet	gray-br	GRAVEL, tr sand, tr silt	Slight Odor		0	
18							0	
19		Wet	Lt br	GRAVEL, tr sand, tr silt	Slight Odor		0	
20		Moist	Brown	CLAY, some silt			0	

Total Depth = 20 feet

Date: 2/23/05
West of (WSW-12-20)

Boring Log - SSB-6

VCA Index No. D6-00014-97-07
NYSDEC Spill Nos. 02-12777 & 02-12778
Rod Mill Parcel
Old General Cable Site
Rome, New York

Boring Log

Depth (FT)	Recovery (IN)	Description			Separate Phase Hydrocarbons			Sample ID
		Moisture	Color	Fraction	Odor	Visual	PID	
1		Damp	Brown	Concrete, spun 3 1/4 inch augers to 1.5-foot bgs.				
2	18	Damp	Brown	f-c Sand, some silt, tr clay			0	
3							0	
4							0	
5	38	Moist	Brown	f-m SAND & SILT			0	
6							0	
7							0	
8							0	
9	44	Damp	Lt br	f-m SAND & SILT, tr gravel			0	
10							0	
11		Damp	Brown	CLAY, some silt			0	
12							0	
13	28	Moist	Brown	CLAY, some silt			0	
14		Moist	gray-br	m-c SAND, some gravel			0	
15							0	SSB-6
16		Wet		Same as above			0	
17	36	Wet	gray-br	GRAVEL, tr sand, tr silt	Slight Odor		1	
18							1.2	
19		Wet	Lt br	GRAVEL, tr sand, tr silt	Slight Odor		1.3	
20							1.2	
							0.9	
							0.3	
							0.6	

Total Depth = 20 feet

Date: 2/23/05
East of (WSW-8-19)

APPENDIX C
LABORATORY ANALYTICAL DATA PACKAGE (BOUND SEPERATELY)

VCA Closure Report
Rod Mill Parcel
Old General Cable Site
Rome, New York

August 2005